

Dtec Personal Data Protection Policy and Privacy Policy

Introduction

DİZAYNVİP TEKNOLOJİ BİLİŞİM VE OTOMOTİV SANAYİ ANONİM ŞİRKETİ (DTEC Teknoloji) (“Dtec”, “we”, “us”, “our”) has created a connected vehicle API platform that enables application developers (“Developers”) to develop applications and use standard APIs to communicate with vehicles produced by certain vehicle manufacturers (“Account Identification Information”). This platform, together with our website (“Website”) available at <https://dtec.app/> and any services provided by us in relation to this platform or the Website are referred to herein as the “Service”.

This Privacy Policy explains how Dtec processes personal information or personal data (“Personal Data”) and certain other information collected in the provision of our Service. This Privacy Policy does not apply to any third party website, product or service (“Third Party Service”), including a third party website, product, or service linked to the Service. If the Third Party Service links to or is enabled through the Service, Dtec does not operate those Third Party Services - please always review the privacy practices and terms of service of those Third Party Services before providing any information to third parties.

In this Privacy Policy, “You” refers to a visitor to our Website, a Developer using our Service (“Customer”), or the Customer's End Users. If you are an End User, we generally process your Personal Data (as described below) at the direction of our Customers. The use of Personal Data of our Customers’ End Users is subject to our contract with that Customer and the Customer’s own privacy policies. Our Customers are obliged to ensure that End Users’ privacy rights are respected, in particular to ensure that appropriate disclosures are made about third-party data collection and use. If you are an End User and you would like to learn more about how the Customer may use your Personal Data when using our Service, please contact that Customer directly or review that Customer's privacy policy.

Please review this Privacy Policy carefully before using the Service or disclosing any Personal Data to Dtec and contact us at privacy@dtec.app if you have any questions. By using the Service in any way or accessing the Website, you acknowledge that you accept and agree to the terms, practices, and policies set forth in this Privacy Policy. If you do not agree to this Privacy Policy, please do not access the Website or otherwise use the Service.

Collecting Information

When you interact with us through the Service, we may collect Personal Data and other information from you, as further described below. Please read “Dtec's Use of Your Personal Data” to better understand how we use your data.

A. End User Information

We collect the following categories of Personal Data relating to End Users:

Account Information: We collect Personal Data about you (“Account Personal Data”) that is necessary for you to use the applications offered to you by the Developers. These data may include information such as your e-mail address, password, PIN (account identification information), and Vehicle Identification Number.

Vehicle Information: We collect certain information such as Developers and Account Identification Information through trusted third parties. Some features of the Service allow you to transmit or communicate information about the Service, including data and content about your vehicle and its use (“Vehicle Information”). When you consent to the use of the Third Party Services, you consent to our access to your Vehicle Information, either directly through the use of our APIs or other services or through an application created directly by us. You enable us to interact on your behalf and with your consent through the Third Party Services or Account Identification Information.

Automatically Collected Information: We automatically collect End Users' interaction with the Service through certain information, as described below under “Automatically Collected Information”.

B. Customer or Visitor Information

If you are a customer, prospect customer or visitor to our Website, we collect Personal Data that you voluntarily provide, for example, when you contact us with inquiries, contact our sales team or customer support team, respond to one of our surveys, sign up to access the Service, sign up for an event, make a request to receive information about Dtec's products, or make a request to use certain Service components.

The specific Personal Data collected during these interactions vary depending on the purpose of the form or the nature of your request, but generally include the following categories of Personal Data:

Identification and Contact Information: When you sign up to access the Service, we collect your name, e-mail address, phone number, and mailing/billing addresses.

Professional or Business Information: When you sign up for an event, request content or choose to share this information voluntarily, we collect information about your company or employer or your role within your company that helps us better understand you as a customer.

Financial Information: For any Services you purchase for a fee, we collect billing information and your payment card number, bank details and/or a billing address and authentication details needed to process your payments.

Commercial Information: If you create an account, we store a service history of the services you have purchased from us and our communication history related to those services.

Voice Recordings: The wake words are continuously listened to by the microphone. As soon as the microphone detects the wake word, it will activate the system and transmit the spoken word to other modules. Most other audio assistants currently available must constantly listen to all spoken words until they detect their wake word, which obviously goes against the fair use of personal data. With DtecA, only the wake word will be detected by the microphone, which will then activate the system, thus effectively protecting user privacy.

Image Recordings: It is very common for voice command systems to be adversely affected by background noise. DtecA uses an advanced noise cancellation software module, which separates the human voice from the environmental noise. This module is important for microphones to provide the correct input.

Automatically Collected Information: Additionally, we automatically collect certain information related to the interaction with the Service, as described below under “Automatically Collected Information”.

C. Automatically Collected Information

When you visit, use, or otherwise interact with the Service, we may collect certain information about your visit, use, or interactions. For example, we may track the number of people visiting the Service, peak times of visits, which page is visited, which domains our visitors come from (e.g. google.com, yahoo.com, etc.), which browsers they use to access the Service (e.g. Chrome, Firefox, Edge, etc.), general geographic information and navigation patterns. In particular, the following information is automatically generated and saved in our systems:

Daily Information: Information that your browser automatically sends when you visit the Website.

The Daily Information includes information such as your IP address, browser type and settings, the date and time of your visit, and how you interact with the Website. We can also infer from your IP address the geographical area from which you are connecting when you visit the Website.

Customer Usage Data: When you use the Service, we collect operational data about your or your end users' use of the Service ("Customer Usage Data").

Cookies: We may allow your browser to use cookies or similar technologies to collect information after using the Service, after visiting various websites, during a certain period of time and after navigating among different websites. For more information, please read the "Cookies" section.

Dtec's Use of Your Personal Data:

Dtec uses Personal Data provided by you or collected during the provision of the Service in a manner consistent with this Privacy Policy. If you provide Personal Data for a specific reason, we will use the Personal Data relevant to the reason provided, as described in more detail below.

Dtec processes global information in general and makes it specific to individual users. In particular, in-vehicle data collected from DtecA users are treated in such a way that they are processed both for the benefit of the user concerned and for the benefit of the general DtecA user base. Dtec respects users' security and privacy concerns and users who wish to do so can choose not to have even their processed data shared in the ecosystem.

DtecA users who agree to share their in-vehicle data declare this decision at the time of sale and are rewarded with DTEC Token once a year. This process aims to provide users with the highest level of experience and Dtec collects and learns from the data of users who have given their consent. Users reserve the right to opt out of data sharing if they have privacy and security concerns. In this respect, Dtec, unlike social media giants and other data collectors, offers its users a choice, and the process is managed transparently.

Users who choose to share data and contribute to the development of Dtec's artificial intelligence will be rewarded with DTEC tokens. The collected data will be securely transferred to Dtec and processed using the most advanced cryptography technologies. These data will be transmitted to all existing DtecA applications, enabling the DtecB artificial intelligence to learn from these data. This reward system is part of the “data sharing” part of the DTEC tokenomics, the details of which are available under the relevant subheading.

If we intend to use Personal Data in any way that is inconsistent with this Privacy Policy, our users will be continuously informed of this intended use at the time or during the collection of the relevant Personal Data.

A. End User Information

Account Information: We process Account Information to create and manage your Account and to enable you to use applications made available to you by Application Developers. The processing of this information is necessary in relation to our purpose of providing our Service to the Application Developers and also furthers your interests in using the applications made available to you by the Application Developers. We do not use your Account Information for marketing purposes.

Vehicle Information: We process Vehicle Information to provide the Service in line with the relevant Customer's direction and based on our agreement with the relevant Customer.

B. Customer or Visitor Information

We use the Personal Data (as described above) you provide through the Service to provide you with access to the Service, to operate and maintain the Service (including, but not limited to,

providing customer service, fixing malfunctions, testing our security systems, etc.) and to process transactions. This processing is necessary to fulfill the contract we are entering into or have entered into with you.

We also pursue the following legitimate business interests to the extent necessary:

The wake words are continuously listened to by the microphone. As soon as the microphone detects the wake word, it will activate the system and transmit the spoken word to other modules. Most other audio assistants currently available must constantly listen to all spoken words until they detect their wake word, which obviously goes against the fair use of personal data. With DtecA, only the wake word will be detected by the microphone, which will then activate the system, thus effectively protecting user privacy.

Responding to your questions, comments, feedbacks or inquiries;

To carry out our administration relating to you, to send you administration information about the Service and to notify you of changes to our terms, conditions and policies and to ask you to make a review or complete a survey;

To administer and protect our business and the Website, prevent fraud, criminal activity or misuse of our Website, and to ensure the security of our IT systems, architecture and networks (including troubleshooting, testing, system maintenance, support and data hosting); and

To comply with legal obligations and legal processes and to enforce, defend or protect our rights (for example, to protect and enforce intellectual property rights).

When you provide us with such information, you consent to us carrying out such processing and we believe that we have a legitimate interest in the purpose for which we carry out such processing. These legitimate business interests are balanced so as not to unfairly put you or others at risk, in particular by taking your personal privacy into account.

C. Automatically Collected Information

We use Daily Information and Customer Usage Data to analyze, administer, maintain, improve and optimize the Website or Service, and therefore they help us understand how you use the Website and Service to better serve you and other visitors. This processing is permitted where it

is necessary for the operation and provision of our Website and Service (for its operation, security, troubleshooting, analytical, statistical, testing and survey purposes) and for the development and improvement of our Service to better serve you and other visitors.

Sharing Your Personal Data

Dtec may share Personal Data with certain third parties for the purposes of providing the Service or realizing legitimate business interests. We will not share any Personal Data without the consent of the relevant Customer or user, except as directed by our customers or in accordance with applicable law.

A. Business Partners

We collaborate with certain business partners (for example, hosting providers, cloud-based service providers and payment processors) to provide the Service. Our business partners may have access to your Personal Data for use under this Privacy Policy and under a commitment to protect your Personal Data in accordance with this Privacy Policy.

B. Customers and Business Partner Subsidiaries

Dtec may transfer Personal Data to Customers, Application Developers, or Account Identification Information as directed by Customers, Application Developers, and Account Identification Information.

C. Third Party Service Providers

Dtec may share Personal Data with certain third party service providers (for example, marketing service providers and data analysis providers) for the purpose of providing and operating the Service. The third party service providers may have access to your Personal Data for use under this Privacy Policy and under a commitment to protect your Personal Data in accordance with this Privacy Policy.

D. Legal Requirements

Dtec may share Personal Data to fulfill legal requirements or respond to legal requests such as court orders, court judgments or other legal processes.

E. Legitimate Business Interests

Dtec may share Personal Data to protect legitimate business interests, for example to prevent fraud, protect or maintain our company's legal rights, and manage and improve our business.

Cookies

Dtec may use cookies and similar technologies to enhance and improve the functionality of the Service and to enhance your user experience. Cookies are small text files that identify your device and are generally used for a variety of purposes, for example, to remember your preferences in the Service, provide certain features, and personalize advertising.

Your Privacy Rights and Choices

You have the right to apply to the data controller and;

- a) to learn whether personal data are processed or not,
- b) to request information if personal data are processed,
- c) to learn the purpose of processing personal data and whether the data are used for intended purposes,
- d) to know the third parties to whom personal data are transferred at home or abroad,
- e) to request the rectification of personal data processed incompletely or inaccurately, if any,
- f) to request the erasure or destruction of personal data,
- g) to request that third parties to whom personal data are transferred be informed,
- h) to object to the processing of personal data exclusively by automatic means, which leads to an unfavorable consequence for the person,
- i) to request compensation for the damage, if any, arising from the unlawful processing of personal data.

A. Access to Your Personal Data

As a Customer or Visitor, you have the right to access your Personal Data. If you would like to submit a request for access to your Personal Data, please send an e-mail to privacy@dtec.app. We reserve the right to charge a fee for providing you with data or access to data, and we

reserve the right to meet your request for access to data within a certain period of time or to refuse your request to provide you with data.

B. Rectification and Deletion of Your Personal Data

If you believe that your Personal Data is inaccurate or if you want your Personal Data to be deleted, please send an e-mail to legal@dttec.app.

C. Objection to the Processing of Personal Data

You have the right to object to the processing of your Personal Data or to a specific purpose of processing. You can send us your objection by sending an e-mail to legal@dttec.app.

D. Managing Your Cookie Settings

You can set your browser not to accept certain cookies or configure how certain cookies are accepted or rejected in your browser's settings. Failure to accept cookies may result in the loss of functionality or limit the usability of some features of the Service.

E. Marketing Communication

If we use your Personal Data to send you marketing materials, you reserve the right to opt out of receiving such marketing communications. If you wish to stop receiving marketing communications, please click the "unsubscribe" link in the marketing e-mails sent to you or send an e-mail to legal@dttec.app.