

# Emir Ozturk - OctoPlan Privacy Policy and Personal Data Notice

Update Date: 10/09/2025

## 1. Purpose

Emir Ozturk ("Developer", "I" or "my"); aims to process users' personal data in accordance with general privacy principles for the relevant person and current data protection legislation provisions, primarily in compliance with the Personal Data Protection Law No. 6698 ("KVKK Law") and other applicable legislation. These principles also regulate the additional rights that individuals will have in cases where the General Data Protection Regulation No. 2016/679 (European Union) applies, in addition to the KVKK Law.

Your personal data that you provide/will provide to me and/or obtained by me through any external means may be processed by me as "Data Controller" in the following ways:

- In a limited and proportionate manner within the scope of and in connection with the purpose of processing your personal data,
- By maintaining the accuracy and up-to-date status of personal data as reported or notified to me,
- Such personal data may be recorded, stored, preserved, reorganized and transferred to institutions legally authorized to request such personal data; will be shared with third parties domestically or abroad within the framework of the conditions foreseen by the legislation and with your explicit consent when necessary, and may be processed in other ways listed under the legislation and subjected to other procedures specified in the legislation.

This Privacy Policy is used for the continuation and improvement of activities carried out by me in accordance with the principles specified in the KVKK Law.

This Privacy Policy explains what data I collect, how I plan to use, store, protect and share the data I collect, how you can withdraw your consent for the processing of this data, and how you can correct and revise the data.

Terms written in capital letters in this Privacy Policy shall have the meanings specified in the Terms and Conditions, unless otherwise defined in this Privacy Policy.

## 2. Collection of Personal Data and Method

I may process your personal data for the purposes specified in this Privacy Policy.

The personal data specifically collected and used by me from users are as follows: Your name and surname, e-mail address and phone number that I will receive when you contact me, your order information if you make a purchase through in-app purchase, messages, sentences, texts, information you upload or transfer to the OctoPlan application, conversations you have with our AI assistant "Octo", your emotional state, current obstacles and personalized learning

data; profile information or social media information if you choose to register, and advertisers' identifier (Identifier for Advertisers-IDFA) specified in your mobile device used to access my services, vendors/developers' identifier, vendors/developers' identifier (Identifier for Vendors-IDVF) specified in your mobile device, Internet Protocol Address-IP Address, and geographical location information (if you have given permission).

## **Data Categories and Data Types**

**Identity and Contact Information** Name, surname, phone number, your e-mail address (if you contact me)

**Transaction Security and Application Data** Internet traffic data (network activities, IP address, visit data, duration, time and date information, information about your access to and use of the application, time spent on OctoPlan), device name, In-app purchase history, Identity Token (Token ID) (when you allow notifications through your device), advertisers' identifier specified in your mobile device used to access my services (if you allow, Identifier for Advertisers-IDFA), vendors/developers' identifier specified in your mobile device (Identifier for Vendors-IDVF)

**Profile Information** (if you choose to register by entering your profile information) User ID, nickname, username, profile picture, user token, Open ID, phone number, e-mail address, password

**Social Media Information** (if you choose to register with your social media account on the following network)

Through Google: Google user ID, nickname, username, profile picture, user token, Open ID, phone number, e-mail address

Through Apple: Apple user ID, nickname, username, profile picture, user token, Open ID, phone number, e-mail address

**User Content and AI Learning Data** Messages, posts, communications, expressions, information, sentences, entries, text, questions, materials you provide, upload, transfer, create, store, use, edit or share with or through OctoPlan, conversations with our AI assistant "Octo", your emotional patterns, current obstacles, preferences and other personalized learning data, answers, selections and other content, records and data.

When using the OctoPlan application, I may request your permission to access your device's audio recording tools to provide certain services. You can choose not to allow me access to your audio recording tools by rejecting my access request or by later disabling this access from your mobile device settings. However, if you choose to disable this access, you may not be able to use some features of my services.

Please do not share any content that may contain sensitive personal information. Also, please remember that it is strictly forbidden to provide any financial information, social security number, health information, images of other individuals, any information about children, or other sensitive or confidential information through OctoPlan.

Please remember that I store user content in accordance with this Privacy Policy and relevant legislation, especially to be able to provide my services. You can request the deletion of this data at any time. Your rights regarding this data are regulated in detail in this Privacy Policy.

**Customer Transaction** Order information, Premium plan purchase information

**Marketing Data** IDFA, IDVF

I may collect the above-mentioned data directly from you through electronic or physical environments, your mobile device, third-party applications through which you can access our application through these environments such as Apple App Store, Google Play App Store ("App Store" along with similar platforms) or third-party sources, in order to comply with legal obligations, improve my services, manage your use of my services, and enable you to enjoy and easily navigate my services.

### **General Principles Regarding the Processing of Personal Data**

Under this Privacy Policy, personal data is processed by me as data controller in accordance with the following basic principles specified here: (i) compliance with law and honesty rules, (ii) being accurate and up-to-date when necessary, (iii) being processed for specific, clear and legitimate purposes, (iv) being limited to the purpose for which they are processed and data minimization, and (v) being stored for the period specified in the relevant legislation or necessary for the purpose for which they are processed.

## **3. Purposes and Legal Reasons for Processing Personal Data**

Your personal data will be processed automatically or non-automatically in accordance with Articles 5 and 6 of the KVKK Law in cases where the current legislation and laws explicitly permit, when explicitly provided for in laws, for the purpose of establishing a contract or directly related to the performance of the contract, and for my legitimate interests, provided that your fundamental rights and freedoms are protected, for the purposes specified below.

### **a) Purposes for Processing Personal Data**

Under this text, your personal data is processed for the following purposes in accordance with the general conditions above:

#### **Identity and Contact Information, Profile Information, Social Media Information**

- Conducting activities in compliance with legislation
- Ensuring compliance with legislation and protecting the rights, privacy and security of individuals
- Conducting product/service commitment operations
- Conducting communication activities
- Conducting/auditing business activities
- Conducting post-sale support services, providing information about services or contacting you for marketing purposes (if you consent)
- Conducting sales processes

- Conducting storage and archiving activities
- Conducting contract processes
- Conducting my services

### **Transaction Security**

- Conducting information security processes
- Conducting audit/ethical activities
- Conducting/auditing business activities
- Conducting activities to ensure business continuity
- Providing information to authorized persons, institutions and organizations

### **Customer Transaction**

- Conducting/auditing business activities
- Conducting post-sale support services
- Conducting sales processes
- Conducting activities for customer satisfaction
- Conducting contract processes
- Managing Premium plan purchases (account-specific, non-transferable)

### **User-generated content and AI Learning Data**

- Conducting my services, for example, creating responses to user inputs for you through my AI assistant "Octo"
- Providing personalized assistance (learning emotional patterns, current obstacles)
- Conducting post-sale support services and providing information about services
- Conducting activities in compliance with legislation
- Ensuring compliance with legislation and protecting the rights, privacy and security of individuals
- Preventing crimes or other illegal acts
- Conducting contract processes
- Conducting storage and archiving activities
- Conducting/auditing business activities
- Conducting activities to ensure business continuity
- Conducting activities for customer satisfaction
- Improving my services (for example, training artificial intelligence models) (To disable the use of your information for training artificial intelligence models, you can make a request through the "Data Subject Application Form" at support@octo-plan.com.)

### **Marketing Data**

- Conducting marketing analysis studies
- Conducting advertising/campaign/promotion processes

## **b) Legal Reasons**

### **Identity and Contact Information, Profile Information, Social Media Information**

- The necessity of processing your personal data, provided that it is directly related to establishing a contractual relationship with you or my performance obligation arising from this contract
- The necessity of data processing for the establishment, use or protection of a right for you
- Your consent (for example, if you consent to my sending you marketing products)

### **User Content and AI Learning Data**

- The necessity of processing your personal data, provided that it is directly related to establishing a contractual relationship with you or my performance obligation arising from this contract
- The necessity of data processing for the establishment, use or protection of a right for you
- The necessity of processing for my legitimate interests, provided that your fundamental rights and freedoms are not harmed
- Your consent

### **Transaction Security and Application Data**

- The law explicitly providing for the process in which I process your personal data
- Conditions necessary to fulfill my legal obligation
- The necessity of processing your personal data, provided that it is directly related to establishing a contractual relationship with you or my performance obligation arising from this contract
- The necessity of processing for my legitimate interests, provided that your fundamental rights and freedoms are not harmed
- Your consent

### **Marketing Data**

- Your explicit consent (obtained through Apple and/or Google)

### **Third Party Internet Sites and Applications**

OctoPlan may contain links to other internet sites or applications that are unknown to me and whose content is not controlled by me. These linked internet sites and applications may also include terms and conditions other than my texts. I cannot be held responsible for the use or disclosure of information that these internet sites or applications may process.

### **Cookies**

Cookies are small text files stored in your computer's or mobile device's browser or hard disk when you visit an internet page or application. I may use cookies when necessary to conduct my services, increase my service performance and functionality, and present content on my sites or third-party sites, including advertisements related to your interests.

### **Push Notifications**

I may occasionally send push notifications about application upgrades or notifications about my services through my mobile application. You can always adjust such communications and notifications from the settings on your device and stop receiving such communications and notifications.

## **4. Data Storage**

Your data will be stored for the period specified in the current legislation or for a reasonable period until the processing purpose ends or for legal limitation periods.

I may continue to store your personal data even after the purpose of use ends, provided that other laws require this or there is separate permission given by you on this matter.

## **5. Technical and Administrative Measures**

I store personal data that I process in accordance with relevant legislation for the periods specified in relevant legislation or necessary for the purpose for which they are processed. I undertake to take all technical and administrative measures necessary to ensure the confidentiality, accuracy and security of personal data and to exercise due diligence.

## **6. Age Restriction**

I do not allow my application to be used by children under 16 years of age.

I do not knowingly collect or process personal data from anyone under 16 years of age. If you become aware that someone under 16 has provided me with personal information, please contact me at [support@octo-plan.com](mailto:support@octo-plan.com).

## **7. Transfer of Personal Data to Third Parties**

Your personal data may be transferred abroad for the following reasons:

- Conducting storage and archiving activities
- Conducting business activities
- Conducting post-sale support services
- Conducting customer relationship management processes
- Correcting technical specifications, technical errors and malfunctions

I may also transfer your personal data to my service providers and third parties embedded in my service for specific purposes.

## **8. Your Rights as Data Subject**

In accordance with Article 11 of the KVKK Law, you can request the following regarding your personal data by applying to me:

- Learning whether your personal data is processed;
- If your personal data is processed, requesting information about it;

- Learning the purpose of processing your personal data and whether they are used appropriately for this purpose;
- Learning the third parties at home or abroad to whom your personal data is transferred;
- In case personal data is processed incompletely or incorrectly; requesting that the transactions made in this context be notified to third parties to whom personal data is transferred;
- Requesting the deletion, destruction or anonymization of personal data when the reasons for processing disappear and requesting that the transactions made in this context be notified to third parties to whom personal data is transferred;
- Objecting to the emergence of a result against you through the analysis of processed data exclusively through automated systems;
- Requesting compensation for damages if you suffer damage due to illegal processing of your personal data;
- Requesting the deletion of personalized data learned by our AI assistant "Octo" from OctoPlan application settings.

In your application containing explanations regarding the above-mentioned rights that you have as a data subject and request to use, your request must be clear and understandable. I will enable you to submit such requests through the "Data Subject Application Form" at [support@octo-plan.com](mailto:support@octo-plan.com).

This Privacy Policy may be revised by me when deemed necessary. If you continue to access OctoPlan and benefit from the Services provided by me after the notification period, you shall be deemed to have consented to the changes in this Privacy Policy.

## Contact Information

**Developer:** Emir Ozturk

**E-mail:** [support@octo-plan.com](mailto:support@octo-plan.com)