

PRIVACY POLICY

Date of Update: 27.10.2022

Welcome to LIDOMA!

We are aware of how important the security of your data is to you. In this respect, it is very important for us to protect your data safely and ensure its confidentiality.

As **LIDOMA VISION E SPORTS OYUN VE ENTERTAINMENT HİZMETLERİ LİMİTED ŞİRKETİ** (hereinafter referred to as "**LIDOMA**" or "**we**"), which was established as a Limited Company in accordance with Turkish Laws and acts as Data Controller, we are committed to respecting your personal data and other confidential information and to taking all reasonable measures to ensure security and to provide the security measures required by law.

For this reason, **LIDOMA's** Privacy Policy aims to provide the necessary information on what purposes and how your data will be used by **LIDOMA** and with whom it may be shared.

This Privacy Policy covers only the services provided through the lidoma.com (hereinafter referred to as the "Site" or "Website") domain name. If your personal data is processed by **LIDOMA** through our website, this data will be used in accordance with our Privacy Policy.

BY USING THE SITE, YOU AGREE TO THE PRIVACY POLICY AND APPLICABLE TERMS OF USE.

We recommend that you view our Privacy Policy each time you visit our website. Because, this Privacy Policy may be updated by **LIDOMA** from time to time for any reason. By using our website, it will be assumed that you have read the latest version of our Privacy Policy and accepted its amended terms. Changes to the Privacy Policy will take effect automatically as soon as they are published on the Site. Each updated new version also applies to the information already collected.

Any updates to the Privacy Policy will be published on the <https://lidoma.com/> home page, privacy statement page and other places deemed appropriate, and you will be informed about how your personal information is collected, used or shared.

Processing of Your Data and Personal Data

Data is information about all numerical facts such as age, height, weight, and categorical facts such as brand, channel name, country, city, which have been collected and analyzed for the purpose of interpreting and presenting. The data also includes your personal data.

Personal data is any information relating to an identified or identifiable natural person, such as name, address, e-mail address, telephone number, date of birth, IP address. Your such data will be processed in full compliance with the Personal Data Protection Law, in addition to this Privacy Policy. In case of a conflict between this Privacy Policy and the relevant legislation, the legal legislation will prevail.

LIDOMA and our contracted service providers uses your personal data for purposes such as; to be able to research and answer your data, complaints, questions and opinions about your messages, to do the most appropriate work for your needs, to send our offers in line with your requests, to provide you with a better service, to facilitate the use of our website, to share advertising and marketing activities with you, to apply for your ideas, to offer a special campaign for you, developing products, projects or proposals.

Some sections of the site may require you to share certain personal data. In this context, you may need to provide your personal data only for the purpose of performing the service and activity in the relevant section. Sharing your personal data with us in such cases is entirely at your discretion, and if you choose not to share it, you may not be able to benefit from our relevant services or activities.

LIDOMA processes your personal data that you have voluntarily shared and forwarded, as well as your personal data in accordance with the general principles if there are processing conditions within the scope of legal legislation.

The information you are asked to provide is at a reasonable level and does not require you to disclose any further information. You may see a small red asterisk (“*”) next to the information that we must provide in order to provide our services to you. Any information without this sign is optional information that you can present.

As **LIDOMA**, within the scope of your personal data:

When creating a User account, we store the following data: first and last name*, password*, e-mail address*, age*, country name, discord and instagram id. We need to collect an indication about your age to make sure that you comply with our minimum age requirements, or with specific age requirements applicable to selected features.

On our Site you may have the option to create a user account and subsequently log into it using a preexisting social media account, as displayed on our Website. If you choose this option, we will pull the following data from your social media profile to populate your user account: username. We use this information to scout for users that could potentially act as influencers for us. Furthermore, you have the option to link any of your accounts on supported social media with your user account on our website.

In the Communication section, we can process users' names, e-mail addresses and messages that users want to forward; to our employees, contracted service providers, authorized dealers, suppliers and affiliates who help us to continue our activities, authorized administrative institutions and other relevant persons and organizations in line with legal obligations.

We can also process scores, match history and scores, game statistics, and other aggregated or anonymous information, nicknames, as well as messages that users want to transmit; to our employees, contracted service providers, authorized affiliates who help us to continue our activities, authorized administrative institutions and other relevant persons and organizations in line with legal obligations.

We can process the name, e-mail address and personal data of people who want to work with us in the career section.

In accordance with Article 5 of the Personal Data Protection Law, personal data may be processed by **LIDOMA** without seeking the explicit consent of the data subject only in cases where one of the following conditions is met:

- a) It is expressly provided for by the laws.
- b) It is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid.

c) Processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract.

d) It is necessary for compliance with a legal obligation to which the data controller is subject.

e) Personal data have been made public by the data subject himself/herself.

f) Data processing is necessary for the establishment, exercise or protection of any right.

g) Processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

Your sensitive personal data (persons' race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, disguise and dress, association, foundation or union membership, criminal conviction and security measures, biometric and genetic data) can only be processed in the cases stipulated by the laws. Adequate measures determined by the Board are taken while processing of special categories of personal data.

Personal data concerning health and sexual life may only be processed, without seeking explicit consent of the data subject, by the persons subject to secrecy obligation or competent public institutions and organizations, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing. Except in these cases, it will not be processed without your express consent.

The following principles will be complied by **LIDOMA** within the processing of personal data:

a) Lawfulness and fairness

b) Being accurate and kept up to date where necessary.

c) Being processed for specified, explicit and legitimate purposes.

d) Being relevant, limited and proportionate to the purposes for which they are processed.

e) Being stored for the period laid down by relevant legislation or the period required for the purpose for which the personal data are processed.

We have prepared separate clarification texts for the processing of your personal data by **LIDOMA**, for each area where your personal data is collected and also for the cookies used on the Site. You can access these clarification texts from the relevant sections, as well as via the **Communications Section Clarification Text**, **Career Section Clarification Text** and the **Clarification Text About Cookies** hyperlinks.

We may also collect your personal data in the following ways:

- The site server automatically collects information such as your internet protocol (IP) address, browser type and language, date and time of login to the application, to help us track user movements in the application and detect trends.
- One or more cookies (cookies) may be assigned (sent) to your device to facilitate your access to the Site and personalize your online experience. The Site uses "cookies" to carefully monitor certain information you enter when you visit or use the Site. "Cookies" are very small files on your computer for record-keeping purposes, which enable records to be kept and thus identified by the Site. The site also uses cookies to provide users with new content and information specific to their interests. Cookies are widely used on many websites and are not dependent on users' personal information. The Site may not work properly if your browser's settings are programmed to refuse all cookies. **Click here** for more detailed information about cookies.
- **LIDOMA** or third parties such as **LIDOMA**'s consultants who determine advertising and marketing strategies and performance assistants may use standard internet tools such as pixel tags (web beacons) that monitor your use of the Site, collect information that enables us to customize the services we offer and the advertisements we publish. Pixel tags (also known as "clear gifs", "web beacons" or "web bugs") are tiny shapes with a unique identifying mark, similar to cookies, used to track the online activity of internet users or access cookies. Unlike cookies saved on the user's hard drive, pixel tags are invisibly embedded within the website or e-mail and are approximately the size of the dot at the end of this sentence. The Site may also use pixel tags when sending promotional (or other) e-mails or newsletters to understand whether these messages have been opened and acted upon. Also, if you came to <https://lidoma.com> through an advertisement you saw on another website, the Site will receive an anonymous identification number.

Purpose of Processing Your Personal Data

Your personal data will also be processed in the presence of the conditions specified in the 2nd paragraph of the 5th article of the Personal Data Protection Law and the 3rd paragraph of the 6th article, in addition to the purposes such as providing the services provided in a complete and complete manner, improving them further, ensuring security and offering new services.

LIDOMA, processes your personal data:

- To be able to research and respond to your complaints, questions and opinions regarding your messages (such as helping you create an account, find a match, and resolve Player Support issues);
- To be able to prepare special sales offers and services for you in line with your requests, and to convey our offers;
- To fulfill our obligations regarding the performance of our services;
- To be able to make listing, reporting, verification, analysis and evaluations by creating a database, to produce statistical information and to share them with the experts of the business, provided that they comply with the confidentiality conditions;
- To be able to analyze how you use our website and other communication channels and to customize our communication channels to serve you better;
- To customize the advertisements and content you see on the Site and to facilitate the use of the Site;
- To be able to research and develop our projects and services and your personal choices regarding them;
- To detect and protect against abuse of the Site and fraudulent transactions;
- To be able to contact you through the communication channels you have shared with us, directly for the purpose of market research or through business partners from whom service is provided for this purpose;

- To provide you with better service by determining the most suitable projects and services for your needs;
- To be able to share advertising and marketing works with you, to apply for your ideas, to develop special campaigns, projects or offers for you;
- It functions to introduce our services or related products and projects to you, to maintain commercial communication about new projects, special offers and other topics or projects that we think you will find interesting.
- To make better the services accessible to you by accommodating specific needs you may have such as visual or hearing impairment by using text to voice or voice to text functionality. We only do this with your consent when you give us info about you for this specific purpose. You can withdraw that consent at any time;
- To administer surveys, contests, sweepstakes, and similar offerings (such as confirming your eligibility or sending you a prize if you win);
- We process your payment information for our legitimate interest within the scope of payment transactions in order to fully perform the services provided within the scope of our contractual relationship with you, to help you manage your accounts and, to comply with a legal obligation where relevant.

Data Integrity

LIDOMA attaches great importance to the fact that the collected data is accurate, complete, up-to-date and intended for use, and works within the framework of the principle of continuous improvement in this regard.

Sharing Your Personal Data

We are aware that it is a legal obligation that your personal data cannot be shared with third parties without consent and/or with the exceptions specified in the legislation on the protection of personal data.

LIDOMA reserves the right to share personal information of users compiled on the Site with third parties in cases where required by applicable legislation and laws, judicial decisions and proceedings,

summons and other legal proceedings, and also in order to prevent harm to its own interests, to protect the safety, rights and legitimate interests of itself and its employees, representatives and Site users.

LIDOMA can share your personal data with our employees, contracted service providers, 3rd party companies involved in the projects and services, associates who help us to continue our activities, authorized administrative organizations and other relevant persons in line with legal obligations and organizations.

These companies, with which we share your data, are liable to the current legislation, but must maintain the confidentiality of the information we have communicated to them. However, **LIDOMA** does not assume any responsibility for the unlawful acts of these third parties.

Our service providers, data analysts, advertising agencies, server providers, companies that provide data storage services, IT and virtual security companies, SMS or e-mail infrastructure services, customer services, are mandatory for us in any case to fulfill or increase the quality of these services and we work with these companies under full confidentiality agreements.

Commercial Transfer

The personal information of the Site users may be shared with the relevant third parties in case of transfer of assets and/or change of owners, such as possible merger, acquisition and/or acquisition of **LIDOMA**.

Data Transfer to Abroad

The transfer of information which may contain personal information to **LIDOMA** and/or third parties by obtaining permission may also include the transfer of this data from one jurisdiction to another.

Your personal data will only be transferred if there is adequate protection in the country to which the data will be transferred. In the absence of sufficient protection, it will be transferred after the data controllers in Turkey and/or the relevant foreign country undertake an adequate protection in writing and have the permission of the Board.

Other Fundamentals

- All **LIDOMA** personnel accept and declare that they know this Privacy Policy and are obliged to comply with it. **LIDOMA** accepts and undertakes that it will evaluate all kinds of complaints about the violation of the Privacy Policy and will initiate the necessary actions in case a violation is detected.
- There may be links (links) to the websites of third parties that are not owned by **LIDOMA**, such as advertisers, including but not limited to those listed on the Site, and in this case, **LIDOMA** is in no way responsible for the content, accuracy of the information provided or the function of these other websites.

Links are provided in good faith and **LIDOMA** cannot be held responsible for subsequent changes in other websites to which it links. Linking to other websites does not mean that these sites are supported by **LIDOMA**. The user's participation in the advertisements linked on the Site or in the sweepstakes or promotions organized by the sponsors, personal or commercial relations with these sites (wherein, any personal information you voluntarily give to these advertisers and sponsors, including the delivery and payment of goods and services, commitment to them. Any rules, conditions and contractual statements you make) are the sole responsibility of the user.

The user accepts and undertakes that **LIDOMA** is in no way responsible for any damages and grievances that may arise due to such relationships, information sharing with advertisers and sponsor companies, and linking to these people on the Site. We encourage you to be aware of and carefully read the legal and privacy notices of all other websites you visit.

- **LIDOMA** may allow third parties or ad networks that are advertising partners to display advertisements on the website. These companies or networks may use tracking tools such as cookies to collect information about the computers used to view or interact with advertisements. No personal information is transferred to these companies or networks by **LIDOMA**.
- All intellectual and industrial property rights regarding all kinds of information, content and their arrangement and partial and/or complete use on the Site belong to **LIDOMA**.
- Note that this Privacy Policy applies only to online information collection and dissemination practices in connection with the Site, and not to any of our offline practices.

Rights Over Your Personal Data

By applying to **LIDOMA** (in case **LIDOMA** is the data controller itself) regarding your personal data processed;

- a) Learning whether your personal data is processed or not,
- b) Requesting information about your personal data if it has been processed,
- c) To learn the purpose of processing your personal data and whether they are used in accordance with the purpose,
- d) To know the third parties to whom your personal data is transferred, in the country or abroad,
- e) Requesting correction of your personal data if it is incomplete or incorrectly processed,
- f) Requesting the deletion or destruction of your personal data within the framework of the conditions stipulated in Article 7 of the Personal Data Protection Law,
- g) Requesting notification of the transactions made pursuant to subparagraphs (e) and (f) to the third parties to whom your personal data has been transferred,
- h) Objecting to the emergence of a result against you by analyzing your processed data exclusively through automated systems,
- i) If your personal data is damaged due to unlawful processing, you have the right to demand the compensation of the damage.

Options / Withdrawal

Users have the right to choose and/or change their preferences by following the methods below.

- You can refuse to share your optional personal data in order to use the services and activities we offer on the site.

- You may choose not to share your personal information, knowing and accepting that you will not be able to access some services and/or use some features of the Site.
- You can request the updating or deletion of your personal data that you have shared in the sections of the Site or the removal of your requests in these areas.
- If you do not want to receive newsletters and promotional e-mails related to the Site, you can cancel your registration to be informed about the newsletter and promotions by clicking the "Cancel Subscription" link at the bottom of the e-mails sent.
- Knowing and accepting that you may experience some problems in accessing some services and/or using some features of the Site, you can set your browser settings to delete and/or refuse cookies.

Updating and Correcting Your Personal Data

If you want to receive a copy of the information you have shared with **LIDOMA**, or if you realize that an information published about you is incorrect and you would like it to be corrected or deleted, please contact us via legal@lidoma.com.

In order to fulfill your request, our IT Unit employees may ask you to verify your identity information and other details, including your personally identifiable information, before taking any action regarding the information to be added and/or deleted.

Following the evaluation of your request within the framework of proportionality, data quality and reasonableness, actions such as changing, correcting or deleting erroneous data will be carried out on this information. In this context, all requests you make to the Site will be tried to be fulfilled in the most appropriate time and in the most appropriate way.

You can use our Personal Data Protection Law Application Form, which we have prepared for you, so that these requests can be fulfilled faster and we can assist you better.

Security of Your Personal Data

LIDOMA attaches importance to protecting the privacy of your data. **LIDOMA** uses appropriate security systems in order to prevent the loss, alteration and use of the data under its control for different purposes, and our forms, which you send data to, also use Azure Cloud which is an encrypted

communication channel during transmission and encrypts information entries as an additional security application is protected by.

When such data reaches **LIDOMA**, these data are protected in accordance with our security and privacy standards. In order to benefit from Azure Cloud, your Internet browser must support Azure Cloud and the Azure Cloud options in your browser must be active.

We also take all administrative measures that we believe are necessary to protect and preserve your personal data. Only authorized employees are allowed to access your personal data to perform their duties related to our services. In this context, our personnel also receive the necessary training and start working after the necessary information process.

However, as in every online data transfer, due to the nature of the information technology sector; **LIDOMA**'s establishment of a level of security that meets the standards will not be able to prevent unauthorized access.

Therefore, **LIDOMA** is not liable for any damage and/or damage caused by security breaches or technical problems and occurring as stipulated in this Privacy Policy. **LIDOMA** is not responsible for any damages that may arise due to information disclosures that may occur due to undesired and/or unforeseen reasons.

At this point, **LIDOMA**'s commitment is to provide an appropriate information security policy determined by the Personal Data Protection Authority, not less than a generally accepted security level. This is not a preventative warranty commitment.

If you have reason to believe that there is any violation of the security of the Site, please contact us via **legal@lidoma.com**

Cookies

LIDOMA may use cookies on its website to improve your experience. No information is collected from your system and/or hard disk through the cookies used.

Cookies are small data files placed on your computer via your browser by the internet web server. When a connection is established between your browser and the server, the site recognizes you through cookies. The purpose of using cookies is to provide convenience to the user visiting the

website. There are four types of cookies according to their intended use: Session Cookies, Performance Cookies, Functional Cookies and Advertising and Third Party Cookies.

LIDOMA uses session cookies, performance cookies, advertising cookies and functional cookies on its website. Session cookies are temporary cookies that are kept in the user's browser until they leave the website. Other cookies are those that remain in the user's browser unless they are deleted by the user. The lifetime of cookies varies depending on the browser settings made by the user.

You have the opportunity to accept or reject cookies by changing the settings in your internet browser. Please refer to your browser's instructions to learn how to change your browser settings or delete cookies. Please note that some features of the site will not be available when cookies are disabled.

For more detailed information, you can review the [**LIDOMA Cookie Applications Policy.**](#)

You can learn about blocking third-party cookies on the following websites:

Mozilla Firefox
Internet Explorer
Google Chrome
Opera

Communication

You can share any of your opinions and questions about this Privacy Policy and/or the general privacy practices of **LIDOMA** by using the following methods:

E-mail : legal@lidoma.com

or

Post : MASLAK MAH. TAŞYONCASI SK. MASLAK 1453 SİTESİ NIŞANTAŞI
ÜNİVERSTESİ OD BLOK NO: 1Y İÇ KAPI NO: B27 SARIYER / İSTANBUL

Relevance : Privacy Policies

Contract Integrity

Site users, if any provision of this Privacy Policy is deemed invalid by a competent court, the provision in force that is most appropriate to the regulation in the aforementioned provision and that

creates the closest effect to the real intention of the parties will be valid. They have accepted and committed that this situation will not prevent the validity and effect of other provisions within the scope of this Privacy Policy.

Dispute Resolutions

Our company policy regarding all possible disputes that may arise between site users and **LIDOMA** is to ensure that these disputes are resolved with the agreement of the parties and the satisfaction of the user. You can send us your complaints and requests from the relevant section of the website regarding all kinds of issues.

In addition, if you wish, you can apply to resolve your disputes through mediation. Your right to mediation does not preclude your right to seek other legal remedies in any way.

In this context, you can make your legal applications to the Commercial Courts of First Instance in your province or district, depending on the subject of your application, or to the Civil Court of First Instance if there is no Commercial Court of First Instance in the province or district where you are located.