

1. INTRODUCTION

This document was last updated on August 20, 2021, to add compliance with Canadian laws.

2. SUMMARY

This is the ETIYA Privacy Policy.

Etiya Bilgi Teknolojileri Yazılım Sanayi ve Ticaret Anonim Şirketi and with affiliates ("ETIYA") provides administrative software, CRM-based services, Product Catalog management, CPQ, Order management, customer service management, billing management, chat bot services and a variety of other products and services.

We are a market and thought leader and aim to maintain a tradition of innovation and adaptability to our customers' needs.

It is present in Turkey, Canada, the Netherlands, Ukraine, US, UAE and Singapore.

ETIYA (as defined in Part IV below) is committed to maintaining the privacy, confidentiality, security and accuracy of customer and employee personal information.

ETIYA Privacy Policy ("Privacy Policy") is a formal statement of principles and guidelines concerning the minimum requirements for the protection of personal information provided by Etiya to its customers and employees. The objective of the Privacy Policy is compliance with legal standards such as federal privacy legislation as set out in Privacy Law in Canada.

The second objective of this policy is to inform you the public of the procedures and appeals available to you in the context of your personal information.

This policy is also redacted with ETIYA's international nature in mind, its activities span three continents.

3. SCOPE AND APPLICATION

The ten PRIVACY LAW principles form the basis of this policy. Each principle must be read in conjunction with the accompanying commentary which has been tailored in accordance with Privacy Law to reflect privacy issues specific to Etiya.

The Privacy Policy applies to all personal information about customers and employees of ETIYA that is collected, used or disclosed by ETIYA. The Privacy Policy applies to the management of personal information in any form whether oral, electronic or written. The Privacy Policy does not impose any limits on the collection, use or disclosure of the following information by ETIYA :

- (i) information that is publicly available; or
 - (ii) the name, title or business address or telephone number of an employee of an organization.
- The ten principles that form the basis of the Privacy Policy are interrelated and ETIYA shall adhere to the ten principles as a whole. Each principle must be read in conjunction with the accompanying

commentary. As permitted by Privacy Law, the commentary in the Privacy Policy has been tailored to reflect personal information issues specific to ETIYA .

The application of the Privacy Policy is subject to the requirements or provisions of any applicable legislation, regulations, tariffs or agreements, or the order or determination of any court or other lawful authority, including any applicable regulations, orders or determinations of the Canadian Radio-television and Telecommunications Commission, or of the Office of the Privacy Commissioner.

4. DEFINITIONS

Collection - the act of gathering, acquiring, recording or otherwise obtaining any personal information from any source, including third parties, by any means.

Etiya -Etiya Software Canada Inc. or Etiya Bilgi Teknolojileri Yazılım Sanayi ve Ticaret A.Ş with it's affiliates.

Consent – voluntarily agreeing to the collection, use and disclosure of personal information for a defined purpose. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing but is always unequivocal and does not require any inference on the part of ETIYA . Implied consent is consent that can reasonably be inferred from an individual's action or inaction, and will be interpreted according to OPC guidelines and canadian case-law.

Customer - an individual who uses, or applies to use, a Etiya Company's products or services or otherwise provides personal information to an Etiya Company in the course of a Etiya Company's commercial activities.

Disclosure – the act of making personal information available to a third party.

Employee - an employee of Etiya.

Personal information – any information about an identifiable individual, but not aggregated information that cannot be associated with a specific individual. For a customer, such information includes, but is not limited to, a customer's credit information, billing records, service and equipment information, and any recorded complaints. For an employee, such information includes information found in personal employment files, performance appraisals and medical and benefits information.

Third party - an individual other than the customer, their agent or an organization other than ETIYA.

Use - the treatment, handling, and management of personal information by ETIYA .

5. PRIVACY PRINCIPLES

Principle 1 - Accountability

ETIYA are responsible for all personal information under their control and shall designate one or more persons who are accountable for compliance with the following principles.

1.1 Responsibility for ensuring compliance with the provisions of the Privacy Policy rests with the senior management of ETIYA , which shall designate one or more persons to be accountable for compliance with the Privacy Policy. Other individuals within Etiya may be delegated to act on behalf of the designated person(s) or to take responsibility for the day-to-day collection and processing of personal information.

1.2 ETIYA shall make known, upon request, the title of the person or persons designated to oversee ETIYA ' compliance with the Privacy Policy.

ETIYA have designated the Privacy Team to oversee compliance with the Privacy Policy. The Privacy Team can be contacted at:

Data Protection Officer: Bülent Durmuş dpo@etiya.com

General Privacy e-mail: privacy@etiya.com

1.3 ETIYA are responsible for all personal information in their possession or control, including information that has been transferred to a third party for processing. ETIYA shall use appropriate means to provide a comparable level of protection while information is being processed by a third party (see Principle 7).

1.4 ETIYA have implemented policies and procedures to give effect to the Privacy Policy, including:

- a) implementing procedures to protect personal information and to oversee ETIYA ' compliance with the Privacy Policy;
- b) establishing procedures to receive and respond to inquiries or complaints;
- c) training and communicating to staff about ETIYA ' policies and practices; and
- d) developing public information to explain ETIYA ' policies and practices.

Principle 2 - Identifying Purposes for Collection of Personal Information

ETIYA shall identify the purposes for which personal information is collected at or before the time the information is collected.

2.1 ETIYA shall collect personal information only for the following purposes:

Purpose	Legal basis
Managing our contractual and/or employment relationship with you.	Necessary for the performance of a contract to which you are a party.
Recruitment.	Justified on the basis of our legitimate interests for ensuring that we recruit the appropriate employees.
Facilitating communication with you (including in case of emergencies, and to provide you with requested information).	Justified on the basis of our legitimate interests for ensuring proper communication and emergency handling within the organization.

Operating and managing our business operations.	Justified on the basis of our legitimate interests for ensuring the proper functioning of our business operations.
Complying with legal requirements.	Necessary for the compliance with a legal obligation to which we are subject.
Monitoring your use of our systems (including monitoring the use of our website and any apps and tools you use).	Justified on the basis of our legitimate interests of avoiding non-compliance and protecting our reputation.
Social listening (Identifying and assessing what is being said about ETIYA and our clients on social media (only publicly accessible content) to understand sentiment, intent, mood and market trends and our stakeholders' needs and thereby improving our services. We do this through key-word searches and our goal is to gain insights in conversation trends over a specified period and not to identify an individual. To achieve this, we analyze and monitor conversation streams and monitor publicly available opinions, statements or other interactions on social media channels.)	Justified on the basis of our legitimate interest of protecting our assets and our brand on social media
Improving the security and functioning of our website, networks and information.	Justified on the basis of our legitimate interests for ensuring that you receive an excellent user experience and our networks and information are secure.
Undertaking data analytics, i.e. applying analytics to business operations and data to describe, predict and improve business performance within ETIYA and/or to provide a better user experience.	Justified on the basis of our legitimate interests for ensuring the proper functioning of our business operations.
Marketing our products and services to you	Justified on the basis of our legitimate interests for ensuring that we can conduct and increase our business.
Specific Recruitment/Employment Purposes	Legal basis
Assess your suitability for employment for the role for which you are applying, as well as future roles that may become available.	Justified on the basis of ETIYA's legitimate interests of ensuring that it recruits the appropriate employees.
Manage your application.	Justified on the basis of ETIYA's legitimate interests of ensuring that it recruits the appropriate employees.
Facilitate communication with you.	Justified on the basis of ETIYA's legitimate interests of ensuring proper communication within the organization and with you.
Perform administrative functions (e.g. reimburse you for interview-related expenses).	Justified on the basis of ETIYA's legitimate interests of ensuring that it recruits the appropriate employees.
Perform data analytics, including analysis of our applicant pool in order to better understand who is applying to positions at ETIYA and how to attract and keep top talent.	Justified on the basis of ETIYA's legitimate interests of ensuring that it continually improves its recruitment processes.

In some cases, record your online interview for review by additional recruiters and hiring managers.	Justified on the basis of ETIYA’s legitimate interests of ensuring that it recruits the appropriate employees.
If you register on our Careers website, we will enter you into a database to receive future mailings about ETIYA positions and events. You may also receive personalized job recommendations while browsing our Careers website.	Justified on the basis of ETIYA’s legitimate interests of ensuring that it recruits the appropriate employees.
Transfer your contact information, education data, employment data, application information and the CV, all as supplied by you in our recruitment system, to the ETIYA System—a site that we maintain to notify you about new positions that may be of interest to you.	Justified on the basis of ETIYA’s legitimate interests of ensuring that it recruits the appropriate employees.
Administration of employee benefits	Justified on the basis of ETIYA’s legitimate interests of ensuring that our employees receive the applicable benefits.
Perform any legally required reporting and respond to legal process.	Compliance with a legal obligation.

Further references to "identified purposes" mean the purposes identified in this Principle 2.1.

2.2 ETIYA shall specify, orally, electronically or in writing the identified purposes to the customer or employee at or before the time personal information is collected. Upon request, persons collecting personal information shall explain these identified purposes or refer the individual to a designated person within ETIYA who shall explain the purposes.

2.3 Unless required by law, ETIYA shall not use or disclose, for any new purpose, personal information that has been collected without first identifying and documenting the new purpose and obtaining the consent of the customer or employee.

2.4 As members of the public browse the website www.etiya.com advertising cookies will be placed on the users’ computers so that ETIYA can understand consumer interests. “Cookies” are small information packets that a website creates which are stored on the hard drive of a user’s computer by the user’s browser software. ETIYA uses cookies to track and collect information relating to use of the Sites by the public. To ameliorate its services and to ensure clients and audience find what they need on the website.

Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of a customer or employee is required for the collection, use or disclosure of personal information, except where inappropriate.

3.1 In certain circumstances personal information can be collected, used or disclosed without the knowledge or consent of the individual. For example, ETIYA may collect or use personal information without knowledge or consent if it is clearly in the interest of the individual and consent cannot be obtained in a timely fashion.

ETIYA may also collect, use or disclose personal information without knowledge or consent if seeking the consent of the individual might defeat the purpose of collecting the information such as in the investigation of a breach of an agreement or a contravention of a federal or provincial law.

ETIYA may also use or disclose personal information without knowledge or consent in the case of an emergency where the life, health or security of an individual is threatened.

ETIYA may disclose personal information without knowledge or consent to a lawyer representing ETIYA, to collect a debt, to comply with a subpoena, warrant or other court order, or as may be otherwise required by law.

3.2 In obtaining consent, ETIYA shall use reasonable efforts to ensure that a customer or employee is advised of the identified purposes for which personal information will be used or disclosed. Purposes shall be stated in a manner that can be reasonably understood by the customer or employee.

3.3 Generally, ETIYA shall seek consent to use and disclose personal information at the same time they collect the information. However, ETIYA may seek consent to use and disclose personal information after it has been collected but before it is used or disclosed for a new purpose.

3.4 ETIYA will require customers to consent to the collection, use or disclosure of personal information as a condition of the supply of a product or service only if such collection, use or disclosure is required to fulfill the identified purposes. For example, Etiya may collect customers' IP address, MAC address, and router settings from routers connected to Etiya's network for the purpose of providing ongoing service. Etiya uses this data to routinely monitor and manage end-users' connectivity and performance on Etiya's network.

3.5 In determining the appropriate form of consent, ETIYA shall take into account the sensitivity of the personal information and the reasonable expectations of their customers and employees.

3.6 In general, the use of products and services by a customer, or the acceptance of employment or benefits by an employee, constitutes implied consent for ETIYA to collect, use and disclose personal information for all identified purposes.

3.7 A customer or employee may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Customers and employees may contact ETIYA for more information regarding the implications of withdrawing consent.

Principle 4 - Limiting Collection of Personal Information

ETIYA shall limit the collection of personal information to that which is necessary for the purposes identified. ETIYA shall collect personal information by fair and lawful means.

4.1 ETIYA collect personal information primarily from their customers or employees.

4.2 ETIYA may also collect personal information from other sources including credit bureaus, employers or personal references, or other third parties that represent that they have the right to disclose the information.

Principle 5 - Limiting Use, Disclosure and Retention of Personal Information

ETIYA shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. ETIYA shall retain personal information only as long as necessary for the fulfillment of those purposes.

5.1 We do not share personal information with anyone outside ETIYA where we can avoid it, however circumstances when we have to do so.

· **We limit how much information we disclose to third parties:** With respect to third party requests for information, where we are required to disclose personal information we limit it to the information required in the circumstances, provide it only for the purpose stipulated, and make it subject to strict terms of confidentiality. When a court orders us to provide personal information, we tell you about it unless we have been ordered by law not to, and we follow up regularly to question whether non-disclosure orders ought to remain in force.

· **We work to keep as much traffic within Canada as we can:** With respect to Internet traffic, we place an emphasis on preferring in-country interconnection for domestic traffic. We peer openly with peers in Canada whose Autonomous Systems are mostly located within Canada and who provide geographically diverse peering within Canada. We peer conditionally with other peers.

5.2 In certain circumstances personal information can be collected, used or disclosed without the knowledge and consent of the individual. (See Principle 3.1)

5.3 In addition, ETIYA may disclose a customer's personal information to:

- a) another telecommunications services provider for the efficient and effective provision of telecommunications services;
- b) an entity involved in supplying the customer with communications or communications directory related services;
- c) another entity for the development, enhancement, marketing or provision of any of the products or services of ETIYA ;
- d) an agent retained by ETIYA in connection with the collection of the customer's account;
- e) credit grantors and reporting agencies;
- f) a person who, in the reasonable judgment of ETIYA , is seeking the information as an agent of the customer; and
- g) a third party or parties, where the customer consents to such disclosure or disclosure is required by law.

5.4 ETIYA may disclose personal information about their employees:

- a) for normal personnel and benefits administration;
- b) in the context of providing references regarding current or former employees in response to requests from prospective employers, to the extent that such references are granted at all; or
- c) where disclosure is required by law.

5.5 Only those employees of ETIYA who require access for business reasons, or whose duties reasonably so require, are granted access to personal information about customers and employees.

5.6 ETIYA shall keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where personal information has been used to make a decision about a customer or employee, ETIYA shall retain, for a period of time that is reasonably sufficient to allow for access by the customer or employee, either the actual information or the rationale for making the decision.

5.7 ETIYA shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous.

Principle 6 - Accuracy of Personal Information

Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

6.1 Personal information used by ETIYA shall be sufficiently accurate, complete and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a customer or employee.

6.2 ETIYA shall update personal information about customers and employees as and when necessary to fulfill the identified purposes or upon notification by the individual.

Principle 7 - Security Safeguards

ETIYA shall protect personal information by security safeguards appropriate to the sensitivity of the information.

7.1 Etiya shall protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures. ETIYA shall protect the information regardless of the format in which it is held.

7.2 Etiya shall protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

7.3 Etiya will uphold the highest possible standards of security and implement the measure both

7.4 All employees of Etiya with access to personal information shall be required as a condition of employment to respect the confidentiality of personal information. Unauthorized access to personal information will be sanctioned.

Principle 8 - Openness Concerning Policies and Practices

ETIYA shall make readily available to customers and employees specific information about their policies and practices relating to the management of personal information.

8.1 Etiya shall make information about their policies and practices easy to understand, including:

a) The title and address of the person or persons accountable for ETIYA ' compliance with the Privacy Policy and to whom inquiries or complaints can be forwarded;

- b) The means of gaining access to personal information held by ETIYA ; and
- c) A description of the type of personal information held by ETIYA , including a general account of its use.

8.2 ETIYA shall make available information to help customers and employees exercise choices regarding the use of their personal information and the privacy-enhancing services available from ETIYA.

Principle 9 - Customer and Employee Access to Personal Information

This Section of the Privacy Policy of ETIYA provides you with the information necessary to access and correct your personal information.

a. Rights

PRIVACY LAW gives you the right to access any personal information we hold about you at any time. It also gives you the right to request the existence of such information.

We therefore will afford you, employee or customer, a reasonable opportunity to review the PI in the individual's file.

You also have the right to challenge the accuracy and completeness of the information, meaning you have the right to correct the information.

ETIYA has, however, the right to deny access to information it holds about the individual under specific circumstances. We can therefore refuse access if other legal obligations oblige us to do so.

b. Access policy officer

- a. The following person is responsible for receiving your access and correction requests :
 - i. Bülent Durmus, dpo@etiya.com
- b. You can also contact us at the following addresses and general e-mails :
 - i. **Montreal** : WeWork Place Ville Marie 3 Place Ville Marie 4th floor, suite 400 Montreal, Qc H3b 2e3
 - ii. **Istanbul** : Çiftehavuzlar Mah., Eski Londra Asfaltı Caddesi, 151/1BYTÜ Davutpaşa Kampüsü Teknopark B1 Blok No.301, Davutpaşa, Esenler 34220, İstanbul, Turkey

c. Procedure

- a. Your request has to be made in writing
- b. Provides us with detailed list of personal information you are seeking. If possible, provide us with a specific topic, and specific date ranges. Be as specific as possible.
- c. Your request has to pertain to Personal information, which is « information about an identifiable individual », this includes names, birth dates, income, addresses.
- d. If you need any accommodation related to a disability, please advise us in the original request
- e. Our response:
 - i. We will answer as soon as feasible. We will inform you in advance if we consider that we need to charge you a fee for the access.

- ii. We prefer providing digital copies of personal information. It is your right to request paper copies, it is however our right to refuse to do so.
- iii. We also need to comply with other legal obligations and they will be included in our decision-making process

d. Delay

- a. We will provide you with an answer within 30 days.
- b. It is however possible that your request could interfere with our activities, or that complying with it could take more than 30 days.
- c. In that case, we will advise you of the delay and justify our reason for it

e. Correction

- a. If you find an error and wish to correct it, please provide us with documentation, evidence of the error when making the request (example : a scan of your ID card if there is an error in your date of birth.
- b. Etiya shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, Etiya shall transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

f. Third parties

- a. If you are attempting to get access to information about someone else, we may withhold the information.
- b. The exception to this rule is if you demonstrate that is person's life, health or security is threatened, or if the person you are trying to get information about has consented in writing to the release of the information.

Principle 10 - Challenging Compliance

A customer or employee shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for ETIYA ' compliance with the Privacy Policy.

10.1 ETIYA shall maintain procedures for addressing and responding to all inquiries or complaints from their customers and employees about ETIYA ' handling of personal information.

10.2 ETIYA shall inform their customers and employees about the existence of these procedures as well as the availability of complaint procedures.

10.3 The person or persons accountable for compliance with the Privacy Policy may seek external advice where appropriate before providing a final response to individual complaints.

10.4 ETIYA shall investigate all complaints concerning compliance with the Privacy Policy. If a complaint is found to be justified, Etiya shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. A customer or employee shall be informed of the outcome of the investigation regarding his or her complaint.

For inquiries, complaints or more information please contact:

Data Protection Etiya

WeWork Place Ville Marie 3 Place Ville Marie 4th floor, suite 400 Montreal, Qc H3b 2e3

Email: dpo@etiya.com

ETIYA will continue to review the Privacy Policy on a regular basis and at least every five years to make sure it is relevant and remains current with changing technologies and laws and the evolving needs of ETIYA , our customers and employees.

This policy was reviewed on November 10, 2023

6. TEXTUAL REFERENCES

For a copy of the Privacy Law, please see the Privacy Commissioner of Canada website at <http://www.priv.gc.ca/>.