

# Privacy Policy

Last updated: Aug 22, 2023

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of your information when you use the Service and tells you about your privacy rights and how the law protects you.

We use your Personal data to provide and improve the service. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy.

## Interpretation and Definitions

### Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions.

The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

### Definitions

For the purposes of this Privacy Policy:

- **You** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.
- **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Turkcell Global Bilgi.
- **Affiliate** means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.
- **Account** means a unique account created for You to access our Service or parts of our Service.
- **Website** refers to Social Sniffer, accessible from [sniffer.global-bilgi.com.tr](https://sniffer.global-bilgi.com.tr)

- **Service** refers to the Website.
- **Country** refers to: Turkey
- **Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
  
- **Third-party Social Media Service** refers to any website or any social network website through which a User can log in or create an account to use the Service.
- **Personal Data** is any information that relates to an identified or identifiable individual.
  
- **Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- **Device** means any device that can access the Service such as a computer, a cellphone or a digital tablet.
- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

## Collecting and Using Your Personal Data

### Types of Data Collected

Your social profile information for Social Networks you choose to connect to the Social Sniffer. For example, your Facebook profile information may include your Facebook username and profile image.

A specific location such as an address, a city, or a place (for example, a restaurant) if you choose to share this information.

Your messages, posts, comments, images, advertising, and other material you curate on and upload to the Services; and information that is collected from the Social Networks such as Youtube, Google Play, Twitter, LinkedIn. that you choose to connect to and which is displayed on our Services.

Content that you may send and receive through Social Networks may contain personal information that Social Sniffer does not directly collect or process. This may include information such as: names, photos, age, gender, geographic location, opinions, preferences, and phone numbers

The collection of the account begins with the tokens which acquired from Youtube, Google Play, Facebook etc. by logging into the relevant networks through the Social Sniffer

## Usage Data

Usage Data is collected automatically when using the Service.

Social Sniffer Suite is a tool for social media monitoring, engagement and analysis. You can connect social media accounts which you manage such as Facebook, Twitter, Google Play, Youtube, Instagram to follow them and respond the customers real time.

Features:

- Monitoring feeds/comments in real-time
- Monitoring page inbox
- Interacting with feed/comment/messages owners
- Posting instant or scheduled contents
- Various analytics including content categorization, sentiment analysis.

Usage Data may include information such as name, nickname, posts, comments, images that you published on a channel which is monitored by Social Sniffer.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

Social Sniffer uses YouTube API services to collect your YouTube comments and videos and engage your customers.

## Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- **To manage Your Account:** to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- **To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide You** with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- **To manage Your requests:** To attend and manage Your requests to Us.

To revoke user access for Google – Youtube accounts, go to this link:  
<https://support.google.com/a/answer/2537800?hl=en>

Social sniffer acts in accordance with the terms of service of Youtube and other data providers.

You can reach the Youtube's TOS here:

<https://www.youtube.com/static?gl=TR&template=terms>

Google Privacy Policy:

<https://policies.google.com/privacy?hl=en-US>

## Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on —

computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

## Disclosure of Your Personal Data

### Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

### Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

## Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

Revoking your access to Social Sniffer

On the <https://myaccount.google.com/security> page, you can click “Manage Third Party Access” or simply click <https://myaccount.google.com/permissions> page. Then, find the Social Sniffer application and click “Remove Access”

## Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## Contact Us

If you have any questions about this Privacy Policy, You can contact us:

- By visiting this page on our website: [www.globalbilgi.com.tr](http://www.globalbilgi.com.tr)