

## Privacy Notice

### Last Updated: November, 2024

Habitus Research (“Habitus Research,” “we,” or “us”) values your trust and is committed to protecting your personal data. This Privacy Notice explains how we collect, use, disclose, and safeguard your personal data when you engage with our services or visit our website. It also explains your rights under the Personal Data Protection Law No. 6698 (KVK Law) and other applicable regulations.

### 1. Scope

This Privacy Notice applies to personal data collected, processed, and stored by Habitus Research through our websites, applications, and other services (collectively referred to as “Services”). It does not apply to personal data processed by third parties or on behalf of our clients under their own privacy policies.

### 2. Personal Data We Collect

We collect personal data directly from you, automatically through your use of our Services, and from third parties.

#### Categories of Personal Data

- Identifying Information: Name, surname, date of birth, national ID number (if required).
- Contact Information: Email address, phone number, postal address.
- Demographic Information: Age, gender, location.
- Behavioral Data: Survey responses, participation in research panels.
- Technical Data: IP address, browser type, and device information.

#### Sensitive Personal Data

We may process sensitive personal data (e.g., health status, biometric data, religious or political beliefs) only with your explicit consent or when required by law, in line with Article 6 of KVK.

### 3. Legal Basis for Processing Your Personal Data

Under KVK, we process your personal data based on the following legal grounds:

- Your explicit consent (Article 5/1).
- Where processing is necessary for the performance of a contract (Article 5/2(a)).
- To comply with legal obligations (Article 5/2(ç)).
- To protect your or others’ vital interests (Article 5/2(d)).
- Where processing is necessary for our legitimate interests, provided your fundamental rights are not infringed (Article 5/2(f)).

#### **4. How We Use Your Data**

We process personal data to:

- Manage your registration and participation in research panels.
- Communicate survey opportunities and deliver rewards or incentives.
- Conduct research, analyze data, and prepare anonymized reports.
- Comply with legal obligations, including tax and audit requirements.
- Detect and prevent fraud or security breaches.
- Improve and enhance our Services.

#### **5. Disclosure of Personal Data**

We share your personal data with third parties only as permitted under KVK and other applicable laws:

- Service Providers: Hosting, IT, payment processing, and survey distribution services.
- Business Partners: Companies conducting joint research initiatives with us.
- Legal Authorities: As required to comply with court orders or legal obligations.
- International Transfers: Personal data may be transferred outside Turkey under Article 9 of KVK, provided explicit consent or sufficient protection in the recipient country.

#### **6. Retention of Personal Data**

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected or as required by law. Afterward, personal data is securely deleted, anonymized, or destroyed in compliance with KVK Law Article 7.

#### **7. Your Rights Under KVK**

As a data subject, you have the following rights under Article 11 of KVK:

- Access your personal data and confirm whether it is being processed.
- Request correction of inaccurate or incomplete data.
- Request deletion of your data where applicable.
- Object to data processing that violates your rights.
- Request data portability to another data controller (where applicable).
- Withdraw consent at any time if processing is based on your consent.

To exercise these rights, please contact us using the information in Section 13. We will respond to verified requests within 30 days.

#### **8. Data Security**

We implement technical and organizational measures to protect your personal data from unauthorized access, alteration, disclosure, or destruction. While we strive to maintain robust security, no system is completely secure.

#### **9. International Data Transfers**

Your personal data may be transferred outside Turkey only under the conditions specified in KVK Article 9, such as your explicit consent or the existence of an adequate level of protection in the receiving country.

## **10. Use of Cookies and Automated Technologies**

We use cookies and similar tracking technologies to improve your experience and analyze usage of our Services. You can manage cookie preferences in your browser settings.

## **11. Children's Data**

Our Services are not intended for individuals under 18. We do not knowingly collect personal data from children. If you believe a child has provided us with personal data, please contact us immediately.

## **12. Updates to this Privacy Notice**

We may update this Privacy Notice from time to time. Any significant changes will be communicated to you as required by law.

## **13. Contact Us**

For questions or to exercise your rights under KVK, please contact us:  
Email: [info@habitusresearch.com](mailto:info@habitusresearch.com)

Alternatively, you may file a complaint with the Turkish Personal Data Protection Authority (KVKK) if you believe your rights have been violated.