



mindlee.ai

KVKK Privacy Notice

Last updated: 15/09/2025

1. Data Controller Information

This Privacy Notice ("Notice") has been prepared by **Mindlee Software and Information Technologies Inc.** ("Company"), acting as **data controller** under:

- The Law on the Protection of Personal Data of Türkiye (KVKK)
- The EU General Data Protection Regulation (GDPR)
- The California Consumer Privacy Act & Privacy Rights Act (CCPA/CPRA)
- Other applicable international data protection laws ("Law")

Company Details:

Mindlee Software and Information Technologies Inc.

Address: *Beyoglu/İstanbul/Türkiye*

Email: team@mindlee.co

Website: www.mindlee.ai

Your security is important to us. The personal data you share with us is protected with care in accordance with this Notice.

2. Personal Data We Collect, Collection Method & Legal Basis

Identity Data

Name, date of birth, gender,

Contact Data

Address, email, mobile phone number

Location Data

Location information

User Transaction Data

Purchased services, purchase history, special date records, communication permissions, campaigns used

Marketing Data

Cookie records, behavioral logs, interests, targeting, and preference history

Legal Transaction Data

Request/complaint records, legal file records, notices, judicial/administrative correspondence

Transaction Security Data

IP address, passwords, traffic data, login/log-out data, username

Risk Management Data

IP address, password and username information

Special Categories of Personal Data (Sensitive Data)

Therapy notes, emotional state logs, mental health-related insights, psychological assessments

Collection Methods:

Personal data is collected through:

- Cookies and similar technologies
 - Automated/non-automated methods
 - Third-party providers such as analytics services, advertising networks, search providers, and technology suppliers
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3. Purposes of Processing Your Personal Data

The Company processes personal data for the following purposes:

1. Verifying user identity for website/mobile transactions
2. Enabling purchases and communications about services
3. Managing user transactions and membership rights
4. Preparing records and documentation (digital or paper)
5. Improving and developing services
6. Responding to official authority requests
7. Providing service-related information and campaign notifications (with explicit consent)
8. Conducting advertising, marketing, profiling, and analytics (with explicit consent)
9. Enhancing user experience and customer satisfaction
10. Sending commercial electronic messages (with explicit consent)
11. Evaluating requests, suggestions, and complaints
12. Ensuring information and transaction security
13. Conducting legal affairs
14. Conducting business operations and audits
15. Fulfilling legal obligations
16. Processing special category data and automated decision-making (with explicit consent)

Legal Basis for Sensitive Data

Special categories of personal data are processed **only with explicit consent** and where legally permitted.

4. AI-Related Processing & Automated Decision-Making

- Special category data (therapy notes, emotional logs, behavioral analysis) may be used **only with explicit consent**.
 - AI algorithms are used to provide personalized insights and improve service quality.
 - Automated decisions **do not produce legal or similarly significant effects**.
 - Users may request **human review** of automated decisions.
 - All AI data used for analytics is **fully anonymised**.
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5. Data Transfers & Recipients

Personal data may be transferred to:

- Company shareholders, employees, business partners
 - Service providers (website, mobile app, infrastructure)
 - Marketing agencies, analytics providers, survey companies
 - Cloud storage providers (domestic and international)
 - Legal advisors, audit firms, and authorities
 - Judicial/administrative bodies upon request
 - AI service providers (only anonymized or safeguarded sensitive data)
 - All transfers are subject to strict technical and administrative safeguards.
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6. Data Retention Periods

We retain personal data only for:

- As long as necessary to fulfill the processing purposes
- The periods mandated by law
- Statute of limitations for potential legal claims

After the retention period expires, data is:

- **Deleted,**
- **Destroyed, or**
- **Irreversibly anonymised**

Aggregated anonymous data may be retained for analytics and service development.

7. Cookies

We use cookies to:

- Provide personalized user experiences
- Analyze website and app performance
- Support marketing and targeting efforts

For detailed information, see our **Cookie Policy**:

 www.mindlee.ai/cookies

8. Your Rights under KVKK

You may apply to the data controller to exercise the following rights:

- Learn whether personal data is processed
- Request information on processing
- Learn the purpose of processing
- Know domestic/international recipients
- Request correction
- Request deletion or destruction
- Request notification to third parties
- Object to automated decisions
- Request compensation for damages

Contact to exercise your rights:

 team@mindlee.co

We respond within **30 days**.

9. GDPR Rights

Under GDPR, users have the right to:

- Be informed
- Access data
- Rectify inaccuracies

- Erase data (“right to be forgotten”)
- Restrict processing
- Data portability
- Object to processing
- Human review of automated decisions
- Object to profiling and targeting

International Transfers:

Transfers to non-EU countries are protected by:

- Standard Contractual Clauses (SCCs)
- Adequacy decisions
- Additional security measures

If you request full deletion, your data is erased within **30 days**.

10. California Privacy Rights (CCPA/CPRA)

California residents have the right to:

1. Know what personal data is collected
2. Request deletion
3. Opt out of sale/sharing of personal data
4. Limit sensitive data use
5. Data portability
6. Non-discrimination
7. Use an authorized agent to exercise rights

Do We Sell Personal Data?

We **do not sell or share** personal data as defined by CCPA/CPRA.

If this changes, we will provide a **“Do Not Sell or Share My Personal Information”** mechanism.

11. Deletion of Your Personal Data

1. In-App Deletion (Immediate)

Profile → Settings → Delete Account

Account deletion is immediate.

2. Email Request (30 Days)

Email: team@mindlee.co

Subject: *Account Deletion Request*

Include your registered email.

3. Facebook Login Users

Delete app permissions via:

https://www.facebook.com/your_information

Data Deleted Includes:

- Profile information
- Usage history
- Message history
- Preferences
- All personal data (except legally mandated retention copies)

Anonymised Data

Non-identifiable data may continue to be used for analytics.

12. Children's Data

Our services are **not intended for children under 13** (or 16 where applicable).

We do not knowingly collect personal data from minors.

If detected, such data is deleted immediately.

13. Consent & Use of the Service

You are free to accept or reject the processing of personal data required for service use.

If you do not accept, please uninstall the application.

For questions:



team@mindlee.co

