PRIVACY AND INFORMATION NOTICE

RealHealth is an application provided by RealWorks Technology Inc. (hereinafter referred to as "we", "us", or "our"). RealWorks Technology Inc. is the data controller of the RealHealth Platform. We created this Privacy and Information Notice to ensure that you understand how we collect and use your personal information.

RealWorks Technology Inc. aims to process the personal data of RealHealth users in accordance with international data protection provisions and the Personal Data Protection Law No. 6698 ("KVKK") and other legislative provisions.

As a user of RealHealth, the personal data you have provided/will provide and/or obtained in any way by RealWorks Technology Inc. as the "Data Controller" will be processed:

- Within the necessary purposes and in a related, limited, and proportional manner to these purposes,
- By maintaining the accuracy and the most current status of such personal data as provided or otherwise made available to RealWorks Technology Inc.,
- In accordance with the conditions stipulated in KVKK and international data protection provisions.

Should there be any change in the purpose or legal basis of processing your personal data, this Privacy and Information Notice will be updated and republished by us.

RealHealth allows you to monitor and analyze your health data to provide detailed health services.

This Notice explains:

1. What Data Do We Collect About You?

As part of RealHealth, we will collect and use your personal data only for the following purposes set out in this notice. Personal data refers to any information that allows us to identify you as a user.

Through this platform, we obtain and maintain information about you in various ways. Your personal data is collected electronically, through all kinds of information, documents and certificates that you submit to us and collect through application, both

before the establishment of the contractual relationship, after the establishment of the contractual relationship and during such contractual relationship.

In this context, we will collect and process the following data:

- 1.1.Personal profile information: Account information (such as account identifier, profile picture, username, gender, date of birth, height, weight, e-mail address, phone number, location, postal code and country).
- 1.2. Health data: During the use of our application, your health data will be obtained through Apple Health with the permission you provide within the scope of this "Privacy and Clarification Text" and your health data and the analysis results and reports of this data will be processed and medication and medication tracking, health measurements, sleep patterns and sleep tracking data, respiratory rate, heartbeat data, pulse, body temperature, body fat, body resistance, nutrition, weight, body fat, oxygen saturation, blood data, blood oxygen level, blood sugar level, blood pressure level, activity status and levels and other health data provided will be processed for the purpose of providing services.

Data such as Cycle Schedule, Stress test, Arterial Stiffness Detection, vascular data (such as pulse wave velocity, pulse waveform diagram, pulse wave conduction velocity, PPG, measurement time and vascular elasticity result and degree), ECG data (such as ECG measurement time, result, waveform, average heart rate and symptoms), Sleep Breath Awareness (sleep duration, heartbeat interval and blood oxygen saturation level) will be processed for the purpose of providing services. None of the Services are medical firmware and the data should be used for reference only and not for medical study, diagnosis or treatment.

In the case of a wearable device, when the device is connected to RealHealth, it will be synchronized with RealHealth. Data about and from third-party devices and apps that you choose to connect to RealHealth, such as third-party device manufacturer, model and identifiers, and third-party app identifiers, including social media identifiers, health and fitness-related data, movement and nutrition-related data, may be collected, including when such data is saved in your RealHealth app. As described above, when using Real

Health, we encourage you to read the privacy and disclosure statements of the third-party apps and third-party devices you choose to connect to Real Health, in particular Apple Health, to which your data will be provided.

- 1.3. Device and network information: Your device information such as your MAC address, device serial number, IMEI or other device identifier (depending on your mobile system), firmware version including mobile advertising identifiers, operating system and device identifiers, your device type and personal settings will be collected for device management, including establishing Bluetooth connections, managing device configurations, firmware updates and viewing the source device of data. Your IP address, network type and network connection will also be collected to improve your network connection experience.
- 1.4. Other data necessary to use RealHealth services or features: To provide services to you, RealHealth needs to access the internet and obtain the following permissions: Physical activity (to track steps and activity), Phone (to get phone status when receiving calls, rejecting incoming calls and receiving incoming call information after pairing with the wearable), Storage (to store exercise photos and read photos from local storage, for example when setting the watch face of the wearable), Location (to map exercises), Microphone (to analyze sleep sounds), Camera (to take workout photos or sweep shots, and to identify and record nutritional values from photos of nutrition facts labels), Contacts (to sync your contacts to your wearable), Messaging (to sync SMS to your wearable), Calendar (to sync workout plans to your calendar), Call logs (to sync calls to your wearable), and Apple Health (to provide and process data with read and write permission). You can manage permissions on your device by going to App Permissions.
- 1.5. We may also collect other information about you, your devices, apps and your use of RealHealth in ways we have explained to you or with your consent. Over time and across third party websites, devices, apps and other online features and services, we may collect personal information about your activities on websites, apps and connected devices. The information we obtain may be disclosed or aggregated to other relevant third parties who use it to evaluate the use of RealHealth and to help administer the RealHealth application.

2. How We Use Your Data

In order to provide you with RealHealth functionalities and to fulfill contractual obligations, this app needs to collect and process your data for customer relationship management, maintenance, software and system updates, user identification, as well as for diagnostic, development and repair purposes. The processing of your personal data as indicated is based on your contract with us. Your movement and health data, including sensitive information about you, will only be processed after you have given your explicit consent in the app.

Your personal data may be shared with third parties with your consent, so please read the third party privacy policies carefully during authorization. Your movement and health data will not be processed for any purpose other than to make it available for RealHealth and third-party health and movement services and apps to store and access based on your prior authorization.

RealHealth supports the sharing of movement and health data with other and third-party health and movement apps or with relevant healthcare professionals or organizations. Such data sharing is only based on your prior authorization.

We use the information collected for the following purposes:

- Identify and verify your identity so that you can use RealHealth;
- To provide you with RealHealth in a comprehensive manner for the purpose for which it is intended, including to allow you to interact with, engage with and connect to third party content;
- respond to your requests, questions and instructions made through RealHealth;
- provide you with customized content, such as importing your exercise routine from another app into RealHealth, and recommendations tailored to your interests and the way you interact with RealHealth;
- Provide promotions and offers through direct marketing, communications and direct marketing only where you have given us your separate consent;
- Maintain and evaluate our business and analyze and improve our services and user experience (including developing new products; developing and improving our products

and RealHealth; managing our communications; analyzing our products, consumer base and RealHealth; performing data analytics; and performing accounting, auditing and other internal functions);

- protect against, identify and prevent fraud and other criminal activity, claims and other liabilities;
- Comply with and enforce applicable legal requirements, relevant industry standards, and our policies, including this Privacy Notice, the Privacy Policy, and RealHealth Terms and Conditions.

We use and combine the information we collect about you from RealHealth with data from other services or features you use, your devices, and other sources, such as when you associate RealHealth with a third party. We use and combine data collected through RealHealth, as well as information about your online activities on websites and connected devices over time and on third-party websites, devices, applications and other online features and services for the above purposes.

RealWorks Teknoloji Anonim Şirketi (Data Controller/Data Processor) processes personal information for the purposes described above. The legal basis for processing your personal information is summarized below:

Your personal data is processed by automated or non-automated methods, limited to the use of the relevant service/platform, in accordance with the applicable legislation, the Law on the Protection of Personal Data and international data protection provisions; and;

- Based on your explicit consent for the purpose of processing health data;
- For the purpose of sending you commercial electronic messages based on your explicit consent;
- Pursuant to paragraph 2 of Article 5 of the KVKK, c) "In case it is necessary to process the personal data of the contracting parties, provided that it is directly related to the establishment or performance of the contract" provision and subparagraph f) In case it is mandatory to process personal data for the legitimate interests of the data controller, provided that it does not violate the fundamental rights and freedoms of the data subject:

- It is processed for all the above-mentioned collection purposes except for the processing of health data and/or sending you commercial electronic messages,

These conditions and purposes may be updated in line with our obligations arising from the legislation and company policies. Your personal data may be stored for a reasonable period of time until the purpose for which they are processed disappears or until the end of the legal periods specified in the relevant legislation and in any case until they expire.

3. How Long Do We Keep Your Data?

We will not keep your personal data for longer than is necessary for the purposes described in this notice. However, how long we keep your data depends on the legal basis for processing your data. However, the data we process requires us to keep it for the duration of your use of RealHealth in order to fulfill our contract with you. As long as you are an active user of RealHealth, we will store and process this data.

Data that we process to support our business interests, such as your use of RealHealth, will only be retained for as long as necessary for the purposes for which it was collected. This data may be collected so that we can make improvements and enhancements to RealHealth and to perform analytics, or processed to improve your customer service experience. We may also process your data based on your consent. If you withdraw your consent, we will continue to process data collected prior to your withdrawal until the purposes for which such data was collected are achieved.

Your use of RealHealth will involve the transfer, storage and processing of your personal information to other countries. All international data transfers are subject to legal requirements to ensure that your personal information is treated securely and as you expect.

4. How and with whom do we share your data?

RealHealth supports the sharing of movement and health data from your device with third-party health and movement apps and relevant healthcare professionals or organizations. Such data sharing is only based on your prior consent. You can also authorize RealHealth to receive data from these apps. If you enable cloud data synchronization for any app, data from that app will be automatically synchronized to the RealHealth cloud. We recommend that you carefully read the privacy statements/policies of third-party apps/services with which you share your health app data.

The procedures and principles to be applied to personal data transfers are specified in Articles 8 and 9 of the LPPD, and the personal data and sensitive personal data of the data subject may be transferred to third parties in Turkey and/or abroad.

According to your preferences, your explicit consent and the establishment or fulfillment of the service, we will disclose your information within our business and to the following organizations, but only for the purposes described above.

- Affiliated Organizations: Other companies we control or own, such as the service operation;
- Business Partners: Partners, allied health professionals or organizations that we work with to provide RealHealth to you, such as third-party applications that you may choose to connect with RealHealth. These business partners control and manage your personal information;
- Service providers: carefully selected companies that provide services on our behalf or on our behalf, such as cloud service platforms that hold data on our behalf. These providers are also committed to protecting your information;
- Other parties, when required by law or necessary to protect RealHealth, for example, disclosing your information may be required by law, legal process, or court order of government authorities. In addition, law enforcement agencies may ask us for your information for national security, counter-terrorism or other matters related to public safety;
- Other parties in connection with corporate transactions, we may disclose your information to a third party in the context of a merger or acquisition, purchase or sale, or in the event of bankruptcy; and
- In addition to the disclosures described in this Privacy Notice, with your consent or instruction, we may share information about you with third parties when you separately authorize or request such sharing.

5. What are your rights and options?

Pursuant to Article 11 of the LPPD, you may apply to RealWorks Teknoloji Anonim Şirketi (Data Controller/Data Processor) regarding your personal data and request the following

- a. To learn whether your personal data is being processed or not,
- b. To obtain information about the actions to be taken if your personal data has been processed,
- c. To learn the purpose of processing your personal data and whether it is used for this purpose,
- d. Obtaining information about third parties to whom your personal data is transferred domestically or abroad,
- e. To request correction of whether your personal data has been processed incompletely or inaccurately and to request notification of the correction made within this scope to third parties to whom your personal data has been transferred,
- f. To request the deletion, destruction or anonymization of your personal data in the event that the reasons for processing disappear, and to request notification of such deletion, destruction or anonymization to third parties to whom your personal data has been transferred,
- g. To object to the occurrence of a result to your detriment as a result of the analysis of your processed personal data exclusively through automated systems,
- h. To request the compensation of the damages you have suffered due to the unlawful processing of your personal data.

RealWorks Teknoloji Anonim Şirketi will receive and evaluate data subject requests through the "Personal Data Request Form" available at www.realhealth.solutions or within the RealHealth application. If the request is fulfilled or if the request is rejected, you will be notified in writing or electronically, together with the reasons for the rejection.

In addition to the above-mentioned requests that you may submit to RealWorks Teknoloji Anonim Şirketi, the following rights are also offered and automated by us for your use:

- Review of the data we collect (specific to the relevant application)
- Deleting your (app-specific) data in apps and services
- Update and delete your RealHealth Account information
- Exiting marketing communications

6. How can you contact us?

Information on how to exercise your rights as a data subject can be found in Section 5. If you wish to exercise your rights as a data subject, or if you have any questions, comments or suggestions about our processing of your personal data, you can contact us in writing to the address below, or via the contact form at https://www.realhealth.solutions/iletisim or by using the "Personal Data Request Form" available on the RealHealth app:

Address: Yıldız Mahallesi, Asariye Cami Çıkmazı, No.5, Beşiktaş/ISTANBUL

7. Updates to be made

This Privacy and Disclosure Statement may be updated to update or inform you about changes in the way we collect and process your information at RealHealth or changes in applicable laws. We encourage you to periodically check for the latest version of this notice in the app settings.