CONFIDENTIALITY AND DISCLOSURE STATEMENT

RealHealth is an application provided by RealWorks Teknoloji Anonim Şirketi (hereinafter referred to as "we", "us" or "our") RealWorks Teknoloji Anonim Şirketi is the data controller of the RealHealth Platform. We have created this Privacy and Disclosure Statement to make sure you understand how we collect and use your personal information.

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

RealWorks Teknoloji Anonim Şirketi as the "Data Controller" of your personal data that you have provided / will provide and / or obtained externally in any way due to your being a RealHealth user:

• For the purpose for which the processing is necessary and in a relevant, limited and proportionate manner,
• Maintain the accuracy and most current status of such personal data as provided by you to RealWorks Teknoloji Anonim Şirketi,
• We hereby declare that it will be processed in compliance with the conditions stipulated in the KVKK and international data protection provisions.

In case of any change in the purpose or legal grounds for processing your personal data, this Privacy and Disclosure Statement Text will be updated and re-published by us.

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

This Statement explains the following:

What Personal Data Do We Collect About You?

We will only collect and use your personal data for the following purposes set out in this notice. Personal data refers to all information that allows us to identify you as a user.

Through this platform, we obtain and maintain information about you in various ways. 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, email address, phone number, location, zip code and country).

1.2. Health data: During the use of our application, your health data will be processed by sharing your health data with Apple Health and you within the scope of your explicit consent within the scope of this "Privacy and Clarification Text" and the analysis results and reports of this data will be processed and medications and medication tracking, health measurements, sleep patterns and sleep tracking data, respiratory rate, heart rate 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. Your health data to be processed with your use of our application will be anonymized and used for the purpose of training our algorithm and using it in scientific studies.

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 time, 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, not for medical study, diagnosis or treatment.

In the case of a wearable device, the device will synchronize with RealHealth when it is connected to 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, including information from such devices and third-party app identifiers including social media identifiers, will be synced to your RealHealth app.

Including when it is stored. As described above, when using RealHealth, we encourage you to read the privacy and disclosure statements of the third-party applications and third-party devices you choose to connect to RealHealth, in particular Apple Health, to which your data will be provided.

If you upload medical results and tests to RealHealth, we are able to provide a reference evaluation service for the test you have uploaded through our service provider OpenAI (OpenAI Inc., 3180 18th St, San Francisco, California, USA; disclosure text: https://openai.com/api-data-privacy) located abroad. OpenAI servers are located in the United States of America. If there is any information in your uploaded images that can be matched with you (such as name - surname), this information will also be transferred to OpenAI since we do not have the opportunity to intervene in the image.

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.

Other data necessary to use RealHealth services or features: In order 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 workout photos and read photos from local storage, for example, when setting the watch face of the wearable), Location (to map workouts), Microphone (to analyze sleep sounds), Camera (workout photos, to identify and record nutritional values from photos of nutrition facts labels, or to take photos of medical test results and upload them to RealHealth so that the test results can be analyzed and referenced), Contacts (to synchronize your contacts with your wearable device), Messaging (to sync SMS with your wearable), Calendar (to sync workout plans with your calendar), Call logs (to sync calls with 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.

2.   How We Use Your Personal 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 by healthcare professionals to whom you have given your consent. The processing of your personal data as described is based on your contract with us. Your health data, including sensitive information about you, will only be processed with your explicit consent for the purposes of the services RealHealt intends to provide to you and will be shared with healthcare professionals to whom you have given your consent.

Your movement and health data will be stored by RealHealth and third-party health professionals that you consent to within RealHealth and will not be processed for any purpose other than making it accessible when you use the application.

RealHealth supports the sharing of your health data with other and third-party health and movement apps or with the relevant healthcare professional or organization. Such data sharing will only take place 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 allow you to interact, engage and connect with third party healthcare professionals and to provide you with services in line with your intended use of RealHealth;

•   Delivering customized content, such as importing your exercise routine from another app into RealHealth, and making recommendations tailored to your interests and how you interact with RealHealth;

•   Provide promotions and offers through direct marketing, communications and direct marketing only where you have given us your separate consent;

• Protect against, identify and prevent fraud and other criminal activities, claims and other liabilities to the extent permitted by legislation;

• Comply with and enforce applicable legal requirements and our policies, including this Privacy Statement and the RealHealth Terms and Conditions.

With your consent, we use and combine the information we collect about you through 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.

n addition, our services and products may require RealHealth to request access to your Apple and Google data. In this case, your consent to the access request or your request to share it will mean that you give your explicit consent for us to process this data. Such explicit consent will be collected by Apple or Google in accordance with their respective privacy policies depending on the operating system of your device. Providing such explicit consent is in no way a prerequisite for the provision of our products and services. However, we would like you to know that if you do not provide such explicit consent, it may not be technically possible for you to access certain features of our products and services or it may be difficult for you to get full efficiency from our products and services. However, we would like to remind you that the data in question will not be used for marketing and advertising purposes under any circumstances.

RealWorks Teknoloji Anonim Şirketi 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 automatic or non-automatic 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;

• In order to send you commercial electronic messages based on your explicit consent;

• Pursuant to paragraph 2 of Article 5 of the LPPD, c) "In the event that 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" and subparagraph f) If 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:

These conditions and purposes may be updated in line with our obligations arising from legislation and company policies. In this case, we will inform you separately. 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 Personal Data?

We will not store your personal data for longer than is necessary for the purposes described in this notice. However, how long we keep your data (except for your health 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 (excluding your health data), is retained only 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 process it to improve your customer service experience. We may also process your data based on your consent.

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

RealHealth supports the sharing of movement and health data from your device with third-party health and movement apps and/or relevant healthcare professionals or organizations. Such data sharing is only based on your prior authorization. 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 KVKK, and the personal data and sensitive personal data of the data subject may be transferred to third parties in Turkey and/or abroad.

Based on your preferences, explicit consent, establishment or fulfillment of the service, we will disclose your information within our business and to the following entities, but only for the purposes described above:

• Consultants Third-party healthcare professionals or healthcare organizations that you may choose to connect with RealHealth with your consent.

• Service providers: a cloud service platform that holds data on our behalf. This platform is committed to protecting your information; your personal data collected by RealHealth will be stored abroad by Google Firebase, our service provider. (For Google Firebase's policies and procedures on personal data protection and data security: https://bit.ly/realfirebase)

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 make requests on the following issues:

a. Learn whether your personal data is being processed.

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. To obtain information about third parties to whom your personal data is transferred domestically or abroad.

e. To request correction of whether your personal data is incomplete or incorrectly processed 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. Object to the occurrence of a result against you as a result of the analysis of your processed personal data exclusively through automated systems.

h. To demand compensation for the damages you have suffered due to unlawful processing of your personal data.

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

- Review of your 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 by sending a written request to the address below or by sending an e-mail to kvkk@realworkstechnology.com.

Data Controller 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.