

## PRIVACY POLICY

**Last Updated: xx.01.2026**

We, Moyra Teknoloji Ticaret Limited Şirketi (“**Moyra**”, “**we**”, “**us**”, or “**our**”), are committed to protecting your personal data and your right to privacy. We act as the Data Controller and may process your personal data within the limits and circumstances within the scope of the applicable personal data protection legislation (“**Legislation**”). We want you to be informed about the information we collect, how it is used, shared, and protected, its security and your rights regarding them.

This Privacy Policy (the “**Policy**”) provides information regarding the processing of your personal data in connection with the performance of the services delivered via the website <https://www.askmoyra.com/> (the “**Website**”), Moyra mobile application (the “**App**”) and/or any related services, digital services and products (we refer to all of these collectively in this Policy as the “**Services**”).

If you do not accept the terms in this Policy, please refrain from continuing to use our Services. If you have any questions or concerns about our disclosed practices with regards to your personal data, please contact us at <https://moyra.app/support>.

This Privacy Policy does not apply to the privacy practices of third parties that we do not own or control, including but not limited to any third party websites, services, applications, online resources to which the Platform may link or otherwise reference that you may access through the Services. We take no responsibility for the content or privacy practices of any Third Party Services. We encourage you to carefully review the privacy policies of any Third Party Services you access.

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### **Types of Personal Data We Collect**

We collect below personal data you provide to us directly when registering, using our Services, when purchasing our Services and when you interact with our support team;

- *Identity Information:* Name, surname, gender, date, place and time of birth
- *Contact Information:* E-mail address
- *Finance:* Payment records and invoice information
- *Information Security:* Password, user name, IP address, API usage data, logs, device, browser, operating system, Referrer URL
- *Marketing Information:* IDFA and Advertising ID, Cookie records
- *Transactional Information:* purchase information, support tickets, e-mails
- *Other Information:* Any additional personal data voluntarily provided by you through your responses to the quiz questions within the Services.

We do not request or intend to collect any special or sensitive categories of data such as any data on health, race, religion, political opinions, sexual preferences or orientation.

Please be reminded that it is your responsibility to ensure and control that any information, content, material or data you provide to us is accurate, complete and not misleading.

We collect below personal data automatically when you visit and/or use our Services;

- *Finance and transactional information:* When you make a purchase, we collect information about the transaction, such as product details, invoice details, purchase price, and the date and location of the transaction.

- *Services metadata, analytics and device information:* When visit our Services, we collect information about how you access our Services, such as data about the device and network you use, such as your hardware model, operating system version, mobile network, IP address, IDFA and Advertising ID, unique device identifiers and browser and device type.

Advertising ID means Apple Identifier for Advertisers (“**IDFA**”) on Apple and Google Advertising Identity (“**GAID**”). These are unique identifiers for mobile device that advertisers use for interest based advertising. They are consistent across all apps and thus allow cross-app tracking. On Apple you can opt-out this by disabling “allow tracking” option from privacy settings. On Google Android you can opt-out by deleting your Advertising ID from Ads on your privacy settings. Advertising IDs are non-permanent, *non*-personal identifiers, which are uniquely associated with your device. Similar technologies include tracking pixels within ads. These technologies allow companies (including marketers and advertisers) to recognise your device when you use websites and applications.

- *Information Collected by Cookies:* We use tracking technologies, such as cookies, pixels, and session replay technology to collect information about your interactions with the Services, to personalize your experience with our Services, and to measure the performance of our Services. During the use of these cookies and similar technologies, we may automatically collect data that can be considered personal data under Legislation, depending on the type of cookies used on the Services.

We collect below personal data from third parties you visit and/or use our Services:

- *Your name, email address, date of birth, place and time of birth, account user ID, and any other information the third-party platform discloses about you:* When you create an account or log into our Services we collect these data from you. Also, if you create an account or log into our Services using account through a third-party platform (such as Google, Apple or OAuth), we might have access to these data in accordance with the authorization procedures determined by such platform.

You may opt-out of receiving marketing information at any time: such marketing emails tell you how to opt-out. Please note, even if you opt out of receiving marketing emails, we may still send you non-marketing emails. Non-marketing emails include emails about your account with us (if you have one) and our business dealings with you; to process payments you make via the Services; and as we believe necessary or appropriate (a) to comply with applicable laws; (b) to comply with lawful requests and legal processes, including to respond to requests from public and government authorities; (c) to enforce our Policy; and (d) to protect our rights, privacy, safety or property, and/or that of you or others.

## **Purposes and Legal Grounds of Processing Your Personal Data**

We use the personal data that you give and we collect for the following purposes:

- To create user accounts and profiles;
- To provide our Services: providing personalized analyses, relationship and commitment content based on birth information, astrological data and numerical calculation,
- To support our customers: responding to your issue reports, questions or feedback,
- To improve or troubleshoot any issues with our Services;
- Send you technical notices, security alerts, support messages, and other transactional messages;
- To improve the functionality and personalization of our Services;
- To communicate with you;
- To track application installs, for purposes of measuring the effect of our marketing campaigns;
- To comply with our obligations under the Legislation or any applicable contract and policies;
- To comply with legal obligations, including prevention and/or detection fraud or making disclosures to authorized institutions if required under applicable laws;
- To fulfill our legal obligations;
- To provide you with in-app offers and rewards based on your interaction with our Services;
- To serve you with relevant targeted advertisements;
- To make you offers to purchase in-app items on discount based on your activity with our application and your purchase history; and
- To send you marketing communications and/or newsletters if you have subscribed for them about rewards and promotions.

Our legal grounds for the collection of personal data are as follows:

- Processing of personal data is necessary for the establishment or performance of the contract,
- Processing of personal data is necessary for the legitimate interests of Moyra,

- Processing of personal data is necessary for compliance with a legal obligation,
- Based on your explicit consent for sending marketing and commercial electronic communications.

### **To Whom We May Disclose Your Personal Data**

Within the scope of the purposes outlined above, your personal data may be transferred to, shared with, and/or made accessible to the persons listed below, in compliance with the fundamental principles of the Legislation and the conditions and purposes for personal data processing specified therein.

We may share your information with our domestic and abroad third-party service providers, partners and professional advisor who:

- Process credit card or other payments and enable subscription Services,
- Provide specific services on our behalf;
- Perform data storage or processing services;
- Manage and optimize our Services;
- Measure website analytics, use of our applications, and to synchronize content with select third party websites or services.

We may share your information with our shareholders, our direct and indirect domestic and foreign affiliates, and our group companies.

We may disclose personal data in response to a request for information if we believe that disclosure is in accordance with, or required by, any applicable law, regulation, or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements.

In addition, we may disclose personal information in connection with, or during negotiations of, certain corporate transactions, including a merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company.

Lastly, we may disclose de-identified or aggregate user data about our website visitors for any purpose.

In addition, your personal data may and will be transferred abroad and processed by our Group Companies, third party service providers and partners located outside the borders of your country. We will ensure that any transfer of personal data to such countries is carried out in compliance with the Legislation, by adopting an appropriate data transfer mechanism where necessary. If you do not accept the processing and transfer of your personal data abroad, you can choose not to use our Services.

## **When and How We Collect Personal Data**

We collect personal data when:

- You sign up for our Services.
- You visit or interact with our Services,
- You engage with our support team or otherwise communicate with us.
- You view or interact with our emails or other communications.

We collect your personal data through Services and other similar channels operated by or on behalf of the us. Such data may be collected (a) directly from you; (b) from our business partners and service providers; (c) from third-party sources (such as Google, Apple or OAuth); and (d) automatically from the devices you use to access our Services.

## **Your Rights And How To Exercise Them**

You have the following rights under the Legislation with respect to your personal data:

- a) To learn whether your personal data are being processed,
- b) To request information if your personal data have been processed,
- c) To learn the purpose of processing and whether your data are used in line with that purpose,
- d) To learn the third parties to whom your personal data have been transferred, domestically or abroad,
- e) To request correction of incomplete or inaccurate personal data,
- f) To request the deletion or destruction of your personal data within the framework of the conditions set forth in the Legislation,

- g) To request that the transactions carried out pursuant to (d) and (e) above be notified to third parties to whom your personal data have been transferred,
- h) To object to any result to your detriment arising from the analysis of your personal data exclusively through automated systems,
- i) To request compensation for damages in case of unlawful processing of your personal data.

You may submit your requests concerning your rights as a data subject by delivering a written application that includes your explanations regarding the right you wish to exercise, along with documents verifying your identity, to:

- Moyra Teknoloji Ticaret Limited Şirketi: Maslak Mah. Büyükdere Cad. USO Center No:245/27, Sarıyer/İstanbul, Türkiye . xxx@xxx.app
- Or via email to our customer support team at <https://moyra.app/support>.

Your request will be evaluated and finalized by us in accordance with the applicable legal framework from the date of receipt.

While it is essential that no fee is charged for such requests, we reserve the right to charge a fee based on the tariff determined by the competent authority enforcing the applicable law.

## **Cookies**

A cookie is a very small text file placed on your computer or device. We and our partners use limited number of pixel tags and cookies to measure the analytics and performance of our website and to provide and personalize our services, analyze usage, target ads, and prevent fraud. You can disable cookies in your browser or device settings, but in this case some parts of our services may not work properly. You can review our cookie policy by clicking on -----.

## **Security and Retention Period**

We have implemented reasonable security measures designed to protect your personal data from unauthorized access and disclosure.

The personal data you share with us are stored on secure domestic and/or international servers in compliance with the Legislation and our internal standards. In this context, we take the necessary technical and administrative security measures prescribed by the applicable legislation to ensure the security of your personal data.

We will store your personal data only as reasonably necessary to fulfil the purposes set out in this Privacy Policy and for our legitimate interests, such as complying with our legal obligations, resolving litigation, and enforcing our contracts, unless a longer holding period is required or permitted by the Legislation.

For more information, please email us at <https://moyra.app/support->.

### **Links On Our Services**

Our Services may contain links to other websites or services. We do not control what information you provide, or is collected by these third-party websites. We encourage you to read the privacy policies or statements of the other websites you visit.

### **Changes to Our Privacy Policy**

We may modify or amend this Privacy Policy at any time. Any changes to our Privacy Policy will be published on this page. We will put the effective date of the latest version at the top the Policy. Where required by the Legislation, we will obtain your consent to apply such changes. If you do not accept any changes made, please refrain from continuing to use our Services.