### **Privacy Policy**

## 1. Data Controller and Contact

This notice has been prepared by **ARSHIRA TEKNOLOJİ A.Ş.** ("Company", "we", "us") to inform you about the processing of personal data in connection with the website **blendtheproduct.com** and the related APIs/services (the "Service"), in accordance with the **Turkish Personal Data Protection Law No. 6698 ("KVKK")** and the **EU General Data Protection Regulation ("GDPR")**.

Data Controller: ARSHIRA TEKNOLOJİ A.S.

Address: Kızılay, Necatibey Cd. 20/9, 06430 Çankaya / Ankara / Türkiye

E-mail: info@dibs.com.tr

This notice applies to users in Türkiye, the European Economic Area ("EEA"), and users located in other countries.

#### 2. Overview of the Service

Our Service generates a poster image by combining two images uploaded by the user with the help of artificial intelligence:

- a template image, and
- a product image.

The Service is intended to be used with **product photos**. It is expected that blendtheproduct.com will be used only with **product images** and **non-copyrighted template images**.

At the user's own discretion, it is technically possible to upload images that contain copyrighted templates, the user's own face, another person's face or other personal data. However, uploading images that contain **pornographic content**, **child exploitation**, **nudity-focused content**, **excessive violence**, **hate speech**, **or any visual or text that is unlawful or contrary to public morals / public order** is strictly prohibited. In such cases, all legal responsibility lies entirely with the user.

If we detect that such content has been uploaded, we reserve the right to immediately terminate your access, delete the relevant images, retain system logs and transaction records for a reasonable period, and, where necessary, report the situation to the competent administrative and judicial authorities.

#### 3. What Data Do We Process?

The main categories of data we process in this context are as follows:

## 3.1. Identifying and technical data

#### IP address

We collect your IP address to understand which network requests are coming from, to apply usage limits and security controls, and to detect potential attacks and misuse.

The IP address is stored in our systems either directly or in hashed form (e.g. as an ipHash) for a short period in temporary storage systems such as Redis and is automatically deleted once the relevant retention period expires.

# In-app unique identifier (X-Device-Id) and userHash

We use a **randomly generated X-Device-Id** value created on the browser side and sent to us as an HTTP header. This value is **not** a hardware identifier read from your device (such as IMEI, MAC address, etc.); it is only a random identifier generated by our application.

We combine this value with the IP hash and certain technical data to generate a **pseudonymous identifier** in our system called **userHash**. This identifier does not directly identify you as a person, but allows us to recognize the same user/browser again.

The userHash is used to:

- track your daily free usage limit (quota),
- calculate how many posters you have generated within a certain period, and
- prevent misuse.

For this purpose, related counters are stored in Redis and are automatically deleted once the configured retention periods have expired.

## Session cookie (sid)

When you use our site, we set an HTTP-only session cookie called sid in your browser.

- The sid is used to associate your requests with the same session,
- to ensure that you can only see the job status and results for your own session, and
- to increase overall security.

The sid is stored in your browser; on the server side it is linked to job records in Redis for the lifetime of the job. When this period expires, the relationship ends automatically and the corresponding records are deleted.

The sid cookie is **not** used for marketing or third-party advertising tracking; its sole purpose is to recognize your session and securely display the results of your own jobs.

3.2. Image data

To operate the Service, we process the images you upload and the images generated by the system.

### Images uploaded by the user (input)

Through the web interface, you upload two images:

- a template image, and
- a product image.

These images are stored temporarily on **Amazon Web Services (AWS S3)** in order to perform the poster generation process.

The expected usage is to upload product photos, packaging, logos, and similar product-related visuals. These images are sent to an AI model provided by **OpenAI** to generate a new poster image.

# Images generated by the system (output)

Using the output returned by OpenAI, we generate two types of posters:

- Original poster (full-resolution, without watermark)
  - This is the main poster file that you can access after you make a payment via the paid download feature.
  - This file is associated with the relevant job (jobId) via an S3 key (for example, originalImageKey) and is stored on AWS S3 for a certain period to enable paid downloads after the job is completed.

## Watermarked poster (for preview)

- This is the preview version you see on the web interface for free, with a watermark and certain visual restrictions.
- A separate S3 key is stored for this version as well (e.g. watermarkedImageKey).

#### Retention and deletion

- The input images you upload (template and product images) are necessary to complete the poster generation process and are anonymised within a reasonable period after your job is completed.
- The generated poster images (original and watermarked) are stored on AWS S3 for a certain period in order to allow you to use your paid download right and to view your job history; they are anonymised within a reasonable period of time thereafter.
- As the application evolves, image retention periods and automatic deletion policies may be updated; in that case, this Privacy Policy will also be updated accordingly.

## Purpose of use

The images you upload and the images generated by the system are used **only** for the following purposes:

- to perform poster generation,
- to show you a preview (watermarked),
- and, if you have made a payment, to allow you to download the original, non-watermarked poster.

We do **not** sell or share your images with third parties for marketing purposes without your consent.

## 3.3. Payment and billing data

When you make a payment to download the product without a watermark (full-resolution poster), certain additional personal data are processed for invoicing and shared with PAYTR ÖDEME VE ELEKTRONİK PARA KURULUŞU ANONİM ŞİRKETİ during the payment process:

- First and last name
- E-mail address
- Billing address (country, city, district, postal code and other basic billing/address details)
- Transaction details such as payment amount, currency, transaction date and transaction ID

The payment is processed via PAYTR ÖDEME VE ELEKTRONİK PARA KURULUŞU ANONİM ŞİRKETİ (PAYTR). Your card details (card number, expiry date, CVV, etc.) are **not** collected or stored by us; these data are processed directly by PAYTR through its secure payment infrastructure.

We receive from PAYTR only limited information such as:

- Payment status (success/failure),
- Basic transaction information (e.g. payment amount, currency, time and a payment reference/ID).

If your payment is successfully completed, we create a **purchase record in our database**. This record contains:

- Your billing e-mail address,
- Your first and last name,
- Your billing address details,
- Basic transaction details (amount, currency, date/time, payment reference/ID), and
- A technical identifier that links the purchase to the poster you bought (for example a jobld-based file path and a download token).

We use this information solely to:

- Receive and verify your payment,
- Fulfil our obligation to deliver the digital product (the non-watermarked poster),
- Issue invoices and comply with our accounting/tax obligations,
- Provide you with the ability to re-download the product after purchase, and
- Contact you if necessary in relation to your payment for support or informational purposes.

These data are **not** used for marketing or advertising purposes unless explicitly stated otherwise.

The IP address, session cookie (sid) and technical identifiers (X-Device-Id, userHash) are stored only for usage limit and security purposes in short-term temporary storage systems such as Redis and are automatically deleted after approximately 24 hours.

For users who do **not** complete a purchase, once these technical identifiers expire, the images stored on AWS S3 do not, by themselves, contain any name, e-mail or other direct identifier; S3 keys consist only of technical identifiers (for example, jobId-based file paths). In such cases, after a certain period of time, there is no persistent user account or profile system in our infrastructure that directly links these images to your real identity.

For users who **do** complete a purchase, we intentionally keep a limited association in our database between your billing details and the technical identifier of the poster you bought, solely so that we can provide download access, invoicing, legal compliance and basic support. Other than this purchase record, we do not maintain a broader user profile and do not use these data for unrelated marketing purposes.

### 4. Legal Grounds (KVKK and GDPR)

## 4.1. Under KVKK (Türkiye)

Pursuant to Article 5 of KVKK, we process your personal data based on the following legal grounds:

- Being directly related to the establishment or performance of a contract
  - To provide the poster generation Service, free or paid.
- Legitimate interests of the data controller
  - Ensuring the security of the Service, operating usage limit/quota mechanisms, preventing misuse, logging, and debugging.
  - In these cases, we apply data minimisation, pseudonymisation/anonymisation and hashing techniques where possible to avoid unduly harming your fundamental rights and freedoms.

#### Compliance with our legal obligations

 Being able to respond to requests from judicial or administrative authorities and, where necessary, retaining records for a legally required period.

## 4.2. Under GDPR (EEA users)

Pursuant to Article 6 of the GDPR, we process personal data of users in the EEA on the following legal bases:

- Performance of a contract (Art. 6(1)(b) GDPR)
  - Data necessary to provide the Service and generate posters.
- Legitimate interests (Art. 6(1)(f) GDPR)

- Security, prevention of misuse, system performance, quota mechanisms and debugging.
- We are of the opinion that, under a legitimate interest assessment, these processing activities are necessary to keep the Service secure and sustainable and do not disproportionately interfere with users' fundamental rights and freedoms.

#### 5. Data Retention Periods

### Quota and lock keys (Redis)

- User-based counters: approximately 24 hours
- Global counters: approximately **24 hours**
- Cooldown locks (to prevent very frequent requests): approximately 1 minute

## Job records (PosterJob on Redis)

 Job queue, status information and S3 paths are stored for a configured TTL (time-to-live) in the system.

#### Images (input/output files on AWS S3)

- Uploaded template/product images and generated posters can technically be stored longer on AWS S3.
- The purpose of this storage is to complete the job, display the result to the user, and (if applicable) enable the paid download of the original poster at a later time.

After approximately 24 hours, IP, X-Device-Id, userHash and sid data stored in Redis are deleted. As a result, template/product images and generated posters stored on AWS S3 can no longer be reasonably linked to a specific natural person within our systems, and this data effectively becomes independent of personal data and attains an anonymous nature in practice.

#### 6. Sharing and Transfer of Data

Your data is mainly shared with the following categories of recipients:

#### Service providers (data processors)

## Amazon Web Services (AWS)

- Uploaded and generated images are stored on AWS S3.
- AWS provides server infrastructure and storage services. Data is hosted in the Frankfurt (Germany) region.

# OpenAl

- The images you upload are sent to the OpenAl API (e.g. gpt-image-1 model) to generate posters.
- OpenAl may process data in data centres located in the United States or other countries.

# PAYTR ÖDEME VE ELEKTRONİK PARA KURULUŞU ANONİM ŞİRKETİ

When you make a payment to download the non-watermarked poster, the payment process is carried out via **PAYTR** in order to collect and verify your payment.

- Your card details are processed by PAYTR; we do not have direct access to your card data and do not store such data in our systems.
- We share your first and last name, IP- address, e-mail address, billing address and transaction information and PAYTR may process in order to complete the payment and meet its own legal obligations. In this context, PAYTR acts as a separate data controller under its own privacy policy.
- We only receive and use the basic transaction information obtained from PAYTR in order to issue invoices, link the payment to your digital product and provide you with support/communication where needed.

### 7. Cookies

Our system currently uses one **strictly necessary** / **functional** cookie:

#### sid

- Purpose: To identify the session, match jobs with the correct user/session, and provide security and quota control.
- Properties: HTTP-only, long-lived session identifier (max. 365 days), domain: [blendtheproduct.com].

We do not use cookies for advertising or third-party tracking purposes.

## 8. Data Security

We take technical and organisational measures to protect your personal data, including:

- TLS/HTTPS encryption for data in transit
- Access control and authorisation on AWS
- Hashing IP/device-related values using HMAC (working with hashes instead of raw values where possible)

## 9. Your Rights as a Data Subject

## 9.1. Under KVKK (if you are in Türkiye)

Pursuant to Article 11 of KVKK, you have the following rights:

- To learn whether your personal data are processed,
- If processed, to request information regarding such processing,
- To learn the purpose of processing and whether they are used in accordance with this purpose,
- To know the third parties to whom personal data are transferred domestically or abroad.
- To request correction of personal data if they are incomplete or incorrectly processed,
- To request deletion or destruction of personal data where the reasons requiring processing no longer exist,
- To request that these correction/deletion operations be notified to third parties to whom personal data have been transferred,
- To object to the occurrence of a result against you by analysing the processed data exclusively through automated systems,
- To claim compensation for damages arising from the unlawful processing of your personal data.

## 9.2. Under GDPR (if you are in the EEA)

Under the GDPR, you additionally have the following rights (subject to legal conditions):

- Right of access to your data,
- Right to rectification and erasure ("right to be forgotten") and restriction of processing,
- Right to receive your data in a structured, commonly used and machine-readable format and to transmit it to another controller (data portability),
- Right to object to processing based on legitimate interests,
- Right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

### 10. How to Exercise Your Rights

To exercise your rights, ask questions or request the deletion of your data, you can contact us at:

• **E-mail:** info@dibs.com.tr

Please submit your request in a way that allows us to reasonably verify your identity (for example, from the browser you use for the Service and, where applicable, by providing relevant job IDs).

## 11. Third-Party Rights and Prohibited Use

The Service is focused on **product promotion**. You must not upload:

- Portrait photos belonging to third parties,
- Copyright-protected images,
- Brand/packaging designs (without authorisation),
- Illegal content, violent content, hate speech, or pornographic content.

Uploading such content is entirely the responsibility of the user.

# 12. Changes to This Policy

This privacy notice may be updated from time to time in line with changes in legislation and the development of the Service. You can check the "last updated" date at the bottom of this policy to stay informed about changes.

**Last updated:** 04/11/2025