

## NEXT STEP

### PRIVACY POLICY for STUDENTS & PARENTS

NextStep (the “Company”) respects the privacy of its users and is committed to safeguarding their personal information. This Privacy Policy (“Privacy Policy”) explains how we collect, use, store, and protect the personal data of students and parents in accordance with Law No. 6698 on the Protection of Personal Data (KVKK). By accessing our website or using our services, you agree to the practices described in this Policy.

For the purposes of this Policy, “Site” refers to the Company’s website, which can be accessed at [your-nextstep.org](http://your-nextstep.org). “Service” refers to the Company’s services accessed via the Site, including student sign-up for tutoring sessions, communication with tutors, and participation in educational activities. The terms “we,” “us,” and “our” refer to the Company. The terms “you” or “user” refer to the student, the parent, or legal guardian using the Site or Service.

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#### I. INFORMATION WE COLLECT

We collect two types of information: Personal Data and Non-Personal Data. Personal Data refers to information that can identify a user, such as the student’s name, parent’s name, email address, phone number, grade level, and academic needs. This information is collected during the registration process and when scheduling tutoring sessions.

Non-Personal Data refers to data that cannot be used to personally identify you, including browser type, device information, IP address, and general usage statistics. This data is collected automatically through cookies and similar technologies when you interact with the Site.

#### II. LEGAL BASIS FOR PROCESSING

In compliance with KVKK, the Company processes personal data on the following legal bases: explicit consent obtained during registration; necessity for the performance of our Service; compliance with legal obligations; and legitimate interest, including improving our services and ensuring security.

#### III. CHILDREN’S PRIVACY AND PARENTAL CONSENT

The Site and Service are intended for students under the supervision of a parent or legal guardian. Students under the age of 18 must obtain parental consent before using our

Service. By registering a student for our Service, the parent or guardian confirms their consent to the collection and processing of the student's personal data as described in this Policy.

If we learn that personal information has been collected from a student without proper parental consent, we will delete such information immediately.

#### **IV. HOW WE USE AND SHARE INFORMATION**

The personal information provided by students and parents is used to create student profiles, match students with suitable tutors, coordinate session schedules, and provide communication and support services. We also use this data to send reminders, important announcements, and updates regarding sessions.

We do not sell, rent, or trade your personal data for marketing purposes. Personal data may be shared only with authorized Company staff and service providers (such as hosting and email services) under confidentiality agreements. Data may also be disclosed when required by law or to comply with legal processes.

Non-Personal Data is used for statistical analysis, improving user experience, and enhancing the overall functionality of the Site. This data may be shared in aggregated, anonymized form with partners or third parties.

#### **V. DATA RETENTION**

Personal data of students and parents is stored for as long as the student is actively using the Service and for up to two years after the last session, unless a longer period is required by law. After this retention period, personal data will be securely deleted or anonymized.

#### **VI. DATA SECURITY**

We implement technical and administrative measures to protect personal data from unauthorized access, alteration, or disclosure. These measures include encryption protocols, secure servers, and restricted access to authorized personnel only. However, no method of transmission over the internet or electronic storage is completely secure, and by using our Service, you acknowledge and accept this risk.

#### **VII. COOKIES AND TRACKING TECHNOLOGIES**

The Site uses cookies to provide a better user experience and improve the quality of our services. Cookies collect information such as browsing preferences and session activity.

Users may disable cookies in their browser settings; however, certain features of the Site may not function properly if cookies are disabled.

## **VIII. YOUR RIGHTS UNDER KVKK**

Parents and students have the right to request information regarding the processing of their personal data, demand correction or deletion, and object to certain processing activities. Requests may be submitted by contacting us at **[info@your-nextstep.org](mailto:info@your-nextstep.org)**.

## **IX. LINKS TO OTHER WEBSITES**

Our Site may contain links to third-party websites or applications. This Privacy Policy applies only to data collected by the Company through our Site and Service. We are not responsible for the privacy practices of third-party websites and encourage users to review their policies before sharing any information.

## **X. CHANGES TO THIS POLICY**

The Company reserves the right to amend this Privacy Policy at any time. Any significant changes will be announced on the Site and, if necessary, communicated via email to the address provided in your account. Changes will become effective upon posting unless otherwise stated.

## **XI. CONTACT INFORMATION**

For questions or concerns about this Privacy Policy or the processing of your personal data, please contact us at: [info@your-nextstep.org](mailto:info@your-nextstep.org)

*Last Updated: August 4, 2025*