



# **BG'S DREAM FACTORY GROUP OF COMPANIES PRIVACY POLICY AND CLARIFICATION TEXT**

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## **1. Introduction**

BG's Dream Factory is an international technology group of companies that produces pioneering projects in various sectors such as DF Tools, Meriono, Sismograf, and PotioLab, targeting the global market. Our group of companies is committed to protecting the privacy of its users at the highest level within the digital ecosystem in which it operates.

This Privacy Policy has been prepared within an asymmetric and comprehensive legal compliance framework that simultaneously meets the requirements of the European Union's General Data Protection Regulation (EU GDPR), the United Kingdom's Data Use and Access Act (UK DUAA 2025), and the UK GDPR. Our goal is to provide you with complete transparency regarding how your personal data is collected, processed, and protected.

## **2. Corporate Identity and Joint Controllershship**

The legal and technical operations of the digital services, platforms, and projects we offer are jointly carried out by two separate legal entities under the umbrella of our group of companies. In accordance with the guidelines of the European Data Protection Board (EDPB) and Article 26 of the GDPR, the following companies hold the status of "Joint Controllers":

## **BGS DREAM FACTORY LTD (United Kingdom)**

Company Code: 14696427

Registered Address: 124 City Road, London, United Kingdom, EC1V 2NX

Area of Responsibility: Corporate promotion, official and legal procedures, UK and intercontinental sales agreements, global marketing, and business development operations.

## **BGS DREAM FACTORY OÜ (Estonia / EU)**

Company Code: 17094347

Registered Address: Harju maakond, Tallinn, Kesklinna linnaosa, Ahtri tn 12, 15551

Area of Responsibility: Sales within the European Union, EU legal compliance processes, technical infrastructure management, and financial operations.

Although technical infrastructure is coordinated in Estonia and global marketing and intercontinental sales in the UK, you may directly assert your legal rights over your data against either of the data controllers independently of this arrangement.

### **3. Collected Personal Data and Classification**

In accordance with our principle of transparency, the data sets we process while you use our services are grouped under the following categories:

- Identity Data: First name, last name, date of birth, gender, username, and similar platform identifiers.
- Contact Data: Billing and delivery address, email address, telephone numbers.
- Financial Data: Payment details (Payments are not stored in our systems; they are processed by standard-compliant third-party integrators such as Stripe).
- Transaction Data: Details of services purchased from BG's Dream Factory affiliates, order and invoice history.
- Technical and Usage Data: IP address, login data, browser type, time zone, hardware, and operating system information. Page views, clicks, passwords,

platform interests, purchase history, analytical usage patterns, and session statistics.

- Tracker and Telemetry Data: Mouse movements, scroll position, keypress events, touch events, and motion sensor events (Collected specifically by security and spam protection tools like Google reCAPTCHA).

**Disclaimer Regarding Sensitive Personal Data:** Within the scope of our services, information legally considered as "sensitive personal data" (health information, biometric data, race, political opinions, etc.) is not intentionally collected or processed.

#### **4. Lawful Bases and Processing Purposes**

No personal data can be processed without a legal basis. Your data is processed based on the following lawful bases under the EU GDPR and UK DUAA 2025:

- Customer registration, social login, and account management: Performance of a Contract (Fulfilling the terms of service)
- Invoicing and payment processing: Legal Obligation and Performance of a Contract
- Platform security, spam protection, and debugging: Legitimate Interest (Ensuring cybersecurity)
- Product improvement, content display (Google Fonts/Maps), and service enhancement: Legitimate Interest (Commercial development)
- Legal information sharing with official authorities: Legal Obligation and Recognized Legitimate Interest for the UK
- Marketing, remarketing, and analytics: Explicit Consent (or Legitimate Interest for existing customers)

**Note for UK Users:** Information requests from law enforcement or legal authorities are fulfilled under the "Recognized Legitimate Interest" scope pursuant to Article 6(1)(ea) of DUAA 2025.

## **5. Third-Party Integrations and Service Providers**

In order to provide our services, manage our infrastructure, and optimize our platforms, we work with the reliable third-party service providers ("Data Processors") listed below. These providers may process certain data subject to their own privacy policies:

- Hosting and Infrastructure: Wix.com, Ltd., Google Cloud CDN.
- Analytics and Advertising Solutions: Google Analytics 4, Meta Events Manager, Meta pixel, Google Ads (Remarketing/Conversion), Google AdSense, Google Tag Manager.
- Security and System Monitoring: Google reCAPTCHA (Spam protection), Sentry / Functional Software, Inc. (Debugging and infrastructure monitoring).
- Payment Systems: Stripe Inc. (Secure management of payment processes).
- Social Login and External Platforms: Meta Platforms, Inc. (Facebook Login integration), Google LLC (Google Fonts, Google Maps, Google Login/SSO).
- Backup: Google Drive / Workspace.

## **6. Cookies, Tracking Technologies, and Automated Decision-Making (ADM)**

### **Cookie Management (Asymmetric Approach)**

- UK Users: In accordance with UK DUAA 2025 regulations, low-risk cookies that measure the statistical performance of our site, ensure security, and provide basic functionality may be placed on your device without the need for explicit consent (banner approval).
- EU Users: Pursuant to the ePrivacy Directive, all analytical (Google Analytics) and tracking/advertising cookies (Meta Pixel), other than those "strictly necessary" for the system to function, are processed solely with your prior, explicit consent.

### **Automated Decision-Making (ADM)**

There may be algorithmic systems running in the background on our platforms. In cases where these processes lead to a legally binding outcome directly affecting you, you reserve the right to learn the logic behind the decision and request "human intervention."

## **7. International Data Transfers**

Our servers and data infrastructure are primarily located in data centers within the European Union and the United Kingdom. Thanks to the Adequacy Decision renewed post-Brexit (December 2025), data flow between the EU and the UK is completely seamless and secure.

**Transfers to Third Countries:** Due to our use of service providers such as Google, Meta, and Stripe, your data may be transferred to the United States or third-party countries. These transfers are carried out under strict legal safeguards such as Adequacy Decisions by the European Commission or "Standard Contractual Clauses (SCC)."

**Team Access:** A portion of BG's Dream Factory's software and support teams is located in Turkey. Access provided from Turkey for technical maintenance purposes is protected by strict security protocols and the United Kingdom International Data Transfer Agreement (UK IDTA) standards.

## **8. Data Retention Periods**

Your data is retained only for the duration required by the purposes for which it was collected.

Specifically for our Estonian subsidiary (OÜ) conducting our European operations, as required by the Estonian Accounting Act, and for the UK in accordance with HMRC regulations:

- Invoices, receipts, bank statements, contracts, and all accounting records forming the basis for financial transactions must be retained for a legal minimum of 7 years from the end of the relevant financial year.
- Marketing permissions are kept in the system until you withdraw your consent. System logs and maintenance data are deleted or anonymized after being retained for a specific period for security purposes.

## **9. Data Subject Rights and Global Compliance Framework**

UK DUAA Rules for Data Subject Access Requests (DSAR):

Under UK law for data access requests, the Reasonable and Proportionate Search criterion is applied; in cases where clarification is expected, the Stop the Clock right is

exercised, and vexatious requests may be legally refused.

Additional Rights for Users in the United States (CCPA, VCDPA, etc.):

For users in states such as California, Virginia, and Colorado: BG's Dream Factory does not explicitly "Sell" (Do Not Sell) your data for money or illegally "Share" (Do Not Share) it for cross-context behavioral advertising. According to the relevant laws, you have the right to delete, correct, obtain a copy of your data, limit the use of sensitive data, and opt-out of targeted advertising. You can submit your requests via Global Privacy Control (GPC) or by contacting us directly.

For Users in Brazil (LGPD) and Switzerland:

According to Brazilian laws (LGPD), you have the right to know whether your data is being processed, request anonymization, and file a complaint with the National Data Protection Authority (ANPD). Swiss users may exercise all rights of access, objection, and rectification under the Swiss Federal Data Protection Act against our company.

## **10. Mandatory Complaint Procedure (June 19, 2026 Act - UK)**

As of June 19, 2026, pursuant to Section 103 of the UK DUAA, an official corporate complaint procedure regarding data privacy has been implemented.

- You can reach us free of charge via email.
- You will receive an official acknowledgment of receipt within a maximum of 30 days after your complaint reaches us.
- Your complaint will be investigated immediately, and as a rule, our final reasoned decision will be presented to you within three months at the latest.
- If you are not satisfied with the resolution, you retain the right to escalate the matter directly to the ICO.

## **11. Children's Privacy**

Our platforms are not designed for children under the age of 13, and data is not intentionally collected from individuals under 13.

## **12. Supervisory Authorities**

Regarding our data processing activities, you have the right to file a complaint with the official authorities depending on your location:

- For EU Users: Andmekaitse Inspektsioon (Estonian Data Protection Inspectorate - AKI) | [www.aki.ee](http://www.aki.ee) | [info@aki.ee](mailto:info@aki.ee)
- For UK Users: Information Commissioner's Office (ICO) | [www.ico.org.uk](http://www.ico.org.uk)

## **13. Contact Information and Management**

You may submit all your requests regarding your Personal Data, legal processes, or system logs to us in our capacity as Joint Controllers:

**BG's Dream Factory Group of Companies Communications Personnel: Berk Behcet Gerek**

**Email: [berk@df.limited](mailto:berk@df.limited)**

**General Secretariat and Data Privacy Support Center:**

**Email: [support@df.limited](mailto:support@df.limited)**