LEGAL

Privacy Policy

Privacy practices for the TurnoYa website, software platform, mobile applications, booking tools, and AI-enabled communications

Effective Date: August 12, 2026 — AYCEM TECH LLC · TurnoYa · www.turnoya.app

This Privacy Policy explains how AYCEM TECH LLC, doing business as "TurnoYa" ("TurnoYa," "we," "us," or "our"), collects, uses, discloses, stores, and protects personal information when individuals use our website, subscription platform, service-provider applications, business websites powered by TurnoYa, appointment-booking features, and AI-enabled communication tools (collectively, the "Services").

Depending on the context, TurnoYa may act as a business/controller for information collected directly for our own purposes, or as a service provider/processor when we handle information on behalf of a business customer using TurnoYa. Business customers are responsible for providing any additional privacy notices and obtaining any consents required for information they collect from their own clients, employees, contractors, or service providers.

1. Information We Collect

We collect information that is reasonably necessary to provide, secure, support, and improve the Services. The categories may include:

- **Account and business information,** such as name, business name, branch information, email address, phone number, login credentials, roles, permissions, and account settings.
- **Customer and appointment information** entered into the Services, such as client name, contact details, appointment date and time, requested service, assigned service provider, notes, and appointment history.
- **Service-provider information,** such as barber, cosmetologist, employee, or contractor profile details, schedules, availability, and business-related activity within the platform.
- **Communications data,** including chat, WhatsApp, email, social-media messages, support requests, and message content processed through TurnoYa or its integrations.
- **AI interaction data,** including prompts, messages, conversation history, routing information, and related context used to provide AI-assisted responses and automation features.
- **Billing and transaction information,** such as subscription plan, billing status, invoices, payment confirmations, and limited payment-related metadata. Payment card information may be processed by third-party payment processors.

- **Technical and usage information,** such as IP address, device and browser information, operating system, timestamps, log data, pages or features used, and diagnostic information.
- **Cookies and similar technologies** used for authentication, security, preferences, analytics, and operation of the Services.

2. How We Use Information

- Provide, operate, maintain, and support the TurnoYa Services.
- Create and administer accounts, branches, appointments, websites, applications, and service-provider access.
- Enable communications between businesses, service providers, and their customers.
- Operate AI agents and automation features requested by business customers, including responding through supported communication channels.
- Process subscriptions, billing, renewals, plan upgrades and downgrades, and payment-status restrictions.
- Authenticate users, prevent fraud and abuse, troubleshoot issues, and protect the security and integrity of the Services.
- Analyze performance and usage to improve reliability, features, user experience, and customer support.
- Comply with legal obligations, enforce agreements, and protect the rights, safety, and property of TurnoYa, our customers, and others.

3. AI Features and Communications

The Pro plan may use AI agents to assist businesses in responding to customers through channels such as chat, WhatsApp, email, and supported social networks. To provide these functions, message content and related context may be processed by TurnoYa and by technology providers that support the requested AI or communications functionality.

Business customers are responsible for configuring their AI agents appropriately, reviewing their use where necessary, and ensuring that their communications comply with applicable law, platform rules, consent requirements, and industry-specific obligations. TurnoYa does not use customer communications for unrelated purposes except as needed to provide, secure, support, or improve the Services, or as otherwise disclosed or permitted by law.

4. How We Share Information

We do not sell personal information for monetary consideration. We may disclose personal information only as reasonably necessary for the purposes described in this Policy, including to:

- Service providers and infrastructure vendors that support hosting, storage, security, communications, AI functionality, analytics, customer support, and payment processing.
- Integrated communication or platform providers when a business customer enables an integration, including messaging, email, social-network, or similar services.
- A business customer that controls the account through which an end user or service provider interacts with TurnoYa.
- Professional advisers, auditors, insurers, or financing parties subject to appropriate confidentiality obligations.
- Government authorities, courts, regulators, or other parties when required by law or reasonably necessary to protect rights, security, safety, or prevent fraud.
- A buyer, successor, or other relevant party in connection with a merger, acquisition, financing, reorganization, sale of assets, or similar business transaction, subject to applicable law.

5. Data Confidentiality and Security

TurnoYa treats customer information as confidential and uses reasonable administrative, technical, and organizational safeguards designed to protect personal information against unauthorized access, loss, misuse, alteration, or disclosure. No method of electronic transmission or storage is completely secure, so we cannot guarantee absolute security.

6. Data Retention

We retain personal information for as long as reasonably necessary to provide the Services, maintain business and accounting records, resolve disputes, enforce agreements, comply with legal obligations, and protect legitimate business interests. When information is no longer needed, we may delete, anonymize, or securely dispose of it, subject to legal, backup, and technical retention requirements.

7. Your Privacy Choices and Rights

Depending on where you live and which privacy laws apply, you may have rights to request access to, correction of, deletion of, or a copy of certain personal information, and in some

jurisdictions to opt out of certain processing. These rights are subject to legal exceptions and identity verification.

If TurnoYa processes your information on behalf of a business customer, you should generally direct your request to that business first. We will assist business customers with valid privacy requests as required by applicable law and our agreements.

8. Cookies and Similar Technologies

TurnoYa may use cookies, local storage, pixels, SDKs, and similar technologies to keep users signed in, remember settings, maintain security, understand product usage, diagnose performance, and improve the Services. Where required by law, we will provide appropriate choices or obtain consent for non-essential technologies.

9. International and Cross-Border Processing

TurnoYa is operated by AYCEM TECH LLC in Florida, United States. Information may be processed in the United States and in other countries where our service providers operate. Where required, we use appropriate contractual or legal safeguards for cross-border transfers.

10. Children's Privacy

The Services are not directed to children under 13, and TurnoYa does not knowingly collect personal information directly from children under 13 without appropriate authorization. A parent, guardian, or authorized business may use the Services to manage an appointment for a minor. If you believe personal information from a child under 13 has been collected improperly, contact us so we can review and take appropriate action.

11. Third-Party Services and Links

The Services may connect to third-party websites, payment providers, messaging services, social networks, and other platforms. Their privacy practices are governed by their own notices and terms. TurnoYa is not responsible for the privacy practices of independent third parties.

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our Services, technology, business practices, or legal requirements. We will post the updated version on our

website and revise the "Effective Date." Where required by law, we will provide additional notice or obtain consent.

Contact Us

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Privacy requests may be submitted to **support@turnoya.app**. We may need to verify your identity or authority before completing a request.