

TYRIS

Privacy Policy

Privacy Policy for the Tyris mobile application and related services

Effective date	17 September 2026
Application	Tyris
Operator	ÇağınTech Automotive
Privacy contact	info@cagintech.com

1. Introduction and Data Controller

Tyris is an AI-supported tire analysis application operated by **ÇağınTech Automotive** ("Tyris", "we", "us" or "our"). This Privacy Policy explains how we collect, use, store, disclose and protect personal data when you use the Tyris mobile application, associated account services, reports, and related support channels.

For purposes of the EU General Data Protection Regulation (GDPR), the data controller is:

Controller / operator	ÇağınTech Automotive
Product	Tyris
Privacy / support email	info@cagintech.com

2. Scope

This Policy applies to personal data processed through Tyris, including individual users and users acting on behalf of a business or organisation. It also applies to personal data submitted when requesting support or exercising privacy rights.

This Policy does not govern third-party websites or services that are not controlled by us. Where Tyris links to a third-party service, that service may apply its own privacy terms.

3. Personal Data We May Collect

The exact data processed depends on the features you use and the configuration of the Tyris service. We apply data-minimisation principles and seek to process only data reasonably necessary for the stated purposes.

Category	Examples	Why it is processed
Account and identity data	Email address, user/account identifier and authentication information. Authentication credentials are handled through Firebase Authentication; Tyris does not store user passwords in readable/plain-text form.	To create, authenticate, secure and administer your account.
Business / corporate account data	Company name, business contact information, authorised-user details, company logo and other corporate profile information you choose to provide.	To provide corporate account features, branded reports and account administration.
Vehicle and analysis data	Tire photographs uploaded for analysis, AI analysis outputs, reports, vehicle-related details and analysis history that you choose to save.	To perform the requested tire analysis, generate reports and maintain your analysis history.
Customer/vehicle records	Customer and vehicle	To provide customer- and

entered by business users	information entered into Tyris by an authorised business user, where applicable.	vehicle-based analysis history and reporting features.
Support and communications data	Messages, support requests, feedback and information you provide when contacting us.	To answer requests, resolve issues and administer privacy requests.
Technical and security data	IP address, device/app identifiers, timestamps, authentication/security events and limited technical logs generated by the application infrastructure where necessary.	To authenticate users, secure the service, prevent abuse and maintain core service reliability.

4. How We Collect Personal Data

- Directly from you when you create an account, enter company or vehicle information, upload a tire image, generate a report, or contact support.
- Automatically from the application and its infrastructure only where necessary for authentication, security and core service delivery.
- From an organisation that authorises you to use a corporate Tyris account, where applicable.

5. Purposes and Legal Bases for Processing

Where the GDPR applies, we rely on one or more of the following legal bases, depending on the specific processing activity:

Purpose	Typical GDPR legal basis	Examples
Provide the Tyris service	Performance of a contract / steps requested before entering a contract	Account creation, authentication, tire analysis, report generation, saved analysis history.
Protect and operate the service	Legitimate interests	Fraud prevention, security, troubleshooting, service reliability and limited operational logging.
Comply with law and protect legal rights	Legal obligation and/or legitimate interests	Accounting, lawful requests, dispute handling and enforcement of applicable terms.
Optional features requiring permission or consent	Consent, where required	Optional marketing communications or device permissions where applicable and enabled.

6. AI-Supported Tire Analysis and Uploaded Images

Tyris processes tire photographs and related vehicle information to provide AI-supported analysis and reporting. These images are used to deliver the analysis requested by the user and, where configured, to store the resulting report/history for the user account.

Tyris is intended to analyse tire condition, not to identify individuals. Users should avoid including faces, identity documents, licence/registration documents, home addresses or other unnecessary personal information in uploaded images.

Tyris does not use automated processing of personal data to make decisions about an individual that produce legal effects or similarly significant effects within the meaning of Article 22 GDPR. Tire-analysis outputs are informational and should be assessed together with appropriate physical inspection and professional judgement where safety decisions are involved.

7. Service Providers and Data Sharing

We may disclose personal data only where reasonably necessary to provide, secure and administer Tyris, or where required by law. The principal cloud provider identified for Tyris is Google Firebase.

Google Firebase. Tyris uses Google Firebase infrastructure for user authentication and cloud-based database/storage services required to operate the application. Under Google's applicable Firebase data-processing terms, Google generally acts as a data processor for customer personal data processed on behalf of the Firebase customer.

Data may therefore be stored or otherwise processed on Google/Firebase infrastructure. For further information, see [Firebase Privacy and Security](#) and the [Firebase Data Processing and Security Terms](#).

We may also disclose data to competent public authorities, courts or regulators where disclosure is required by applicable law, or where necessary to establish, exercise or defend legal claims. We do not authorise service providers to use Tyris customer data for purposes unrelated to providing their contracted services to us, except where independently required by law or governed by the provider's own service data terms.

8. International Data Transfers

Some service providers may process personal data outside the European Economic Area (EEA). Google states that, unless a Firebase service offers a selectable data location, Firebase data may be processed or stored in locations where Google or its agents maintain facilities; certain services may have specific processing locations.

Where GDPR transfer restrictions apply, we rely on the transfer safeguards made available under the applicable service-provider terms, such as adequacy decisions, the EU Standard Contractual Clauses and other lawful transfer mechanisms, as applicable to the relevant service and transfer.

9. Data Retention

We keep personal data only for as long as necessary for the purposes described in this Policy, taking into account the nature of the data, account status, contractual requirements, security needs, applicable limitation periods and legal obligations. In general:

- Account data is retained while the account remains active and for a limited period afterwards where necessary to complete deletion, maintain security records, resolve disputes or comply with law.
- Uploaded tire images, analysis results and reports are retained for the period necessary to provide the requested service and any history/archive feature selected by the user or organisation, subject to deletion rights and applicable technical backup cycles.
- Support correspondence and security logs may be kept for a reasonable period to resolve issues, prevent abuse and establish or defend legal claims.
- Where a legal retention obligation applies, the relevant data may be retained for the legally required period even after account deletion.

10. Security

We use reasonable technical and organisational measures intended to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. These measures may include authenticated access, encrypted network transport, access controls and cloud-provider security safeguards. No method of electronic storage or transmission is completely risk-free, so absolute security cannot be guaranteed.

11. Your Rights Under the GDPR

If the GDPR applies to the processing of your personal data, you may have the following rights, subject to the conditions and exceptions in applicable law:

- **Access:** obtain confirmation of whether we process your personal data and request a copy of it.
- **Rectification:** ask us to correct inaccurate or incomplete personal data.
- **Erasure:** request deletion of personal data in circumstances where the GDPR provides a right to erasure.
- **Restriction:** ask us to restrict processing in certain circumstances.
- **Data portability:** receive certain personal data you provided in a structured, commonly used and machine-readable format, and request transfer where technically feasible and legally applicable.
- **Object:** object to processing based on legitimate interests in circumstances provided by law, and object at any time to direct marketing.
- **Withdraw consent:** withdraw consent at any time where processing is based on consent, without affecting prior lawful processing.
- **Complaint:** lodge a complaint with a competent data protection supervisory authority, including an authority in the EEA country where you live, work or consider an infringement to have occurred.

To exercise these rights, email info@cagintech.com. Please write “Privacy Request” or “GDPR Request” in the subject line and provide enough information for us to identify the relevant account and request. We may ask for reasonable information to verify your identity before acting on a request.

We will respond without undue delay and, where the GDPR applies, generally within one month after receiving a valid request. That period may be extended where permitted by law for complex or numerous requests, in which case we will inform you as required.

12. Account and Personal Data Deletion

You may request deletion of your Tyris account and associated personal data by contacting:

info@cagintech.com

Suggested subject line: “Tyris Account Deletion Request”. Please send the request from the email address associated with the Tyris account where possible. We may need to verify account ownership before completing the deletion.

Deletion is subject to lawful exceptions. For example, we may retain limited information where required by law, needed to establish or defend legal claims, or necessary for fraud and security records. Residual copies may remain in protected backup systems for a limited backup cycle before being overwritten or deleted in accordance with the applicable infrastructure processes.

13. Business Accounts and Data Entered About Other Individuals

Where a business user enters customer, employee, driver or other third-party personal data into Tyris, that business is responsible for ensuring it has an appropriate legal basis and has provided any notices required by applicable data-protection law. Tyris processes such information to provide the requested application functionality, subject to the applicable contractual and technical arrangements.

14. Children’s Privacy

Tyris is not designed as a service directed specifically to children. If we learn that personal data has been collected from a child in circumstances requiring parental authorisation or other safeguards and those requirements have not been met, we will take appropriate steps to delete or otherwise address the data in accordance with applicable law.

15. Marketing Communications

If Tyris sends optional promotional communications, we will use consent or another lawful basis as required by applicable law. Where electronic marketing is sent, users will be provided with a way to opt out where required. Service-related messages necessary for account security, transaction administration or core product operation are not marketing communications.

16. Changes to This Privacy Policy

We may update this Privacy Policy when Tyris features, service providers, legal requirements or data-processing practices change. The “Last updated” date will be revised when changes are published. Where required by law, we will provide additional notice or request consent before a material change takes effect.

17. Contact Us

For questions about this Privacy Policy, to request account deletion, or to exercise data-protection rights, contact:

Application	Tyris
Operator	ÇağınTech Automotive
Email	info@cagintech.com

TYRIS

Privacy Policy - V2.1

Version 2.1 - Revision and Priority Notice

This page forms an integral part of the main document contained in the same PDF. If a V2.1 provision below conflicts with wording on the same subject in the main document, this V2.1 provision prevails. All other provisions remain unchanged.

Version	2.1
Effective / revision date	17 September 2026
Application	Tyris
Contact	info@cagintech.com

1. Legal Data Controller Identity

For purposes of the GDPR, the data controller is Şevket Özurfalı, a sole proprietor established in Türkiye and trading as ÇağınTech. Tyris is offered under the product/trading presentation “Tyris by ÇağınTech Automotive”. References in the main Privacy Policy that identify “ÇağınTech Automotive” alone as the controller/operator should be read together with, and are superseded by, this legal-controller identification.

Controller: Şevket Özurfalı, sole proprietor trading as ÇağınTech
Registered geographic address: Vişnelik Mahallesi Kahramanlar Sokak No 16/5, Odunpazarı / Eskişehir, Türkiye
Privacy contact: info@cagintech.com

2. EU/EEA Representative

ÇağınTech is established in Türkiye. No EU/EEA representative is identified in this Privacy Policy. Privacy and data-subject requests may be sent directly to the controller using the contact details above.

The applicability of GDPR Article 27 depends on the actual processing context, including whether services are offered to individuals in the EU/EEA or their behaviour there is monitored. This Privacy Policy does not state that Article 27 is inapplicable; that question is assessed separately from this notice.

3. Business Accounts and Data Processing Terms

Where a business customer determines the purposes and essential means of processing personal data entered into Tyris and ÇağınTech processes that data on the customer’s documented instructions, the parties may have a controller-processor relationship. Where required by Article 28 GDPR or other applicable data-protection law, appropriate data-processing terms (DPA) should form part of the relevant business arrangement.

4. International Transfers

Where GDPR restrictions on international transfers apply, Tyris will rely on a lawful transfer mechanism applicable to the relevant service and transfer, which may include an adequacy decision, the EU Standard Contractual Clauses, or another mechanism permitted by applicable law. The actual mechanism must correspond to the service-provider terms and data flow in use.