**WHEN SUBMITTING THIS REPORT, THIS REPORT SHOULD BE ENCRYPTED BY PGP KEY THAT IS ANNOUNCED ON https://samsungtvbounty.com/PublicKey.txt**

**Bug Title :**

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**Description :**

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**Samsung Smart TV Bug Bounty Privacy Notice**

Effective Date: April 2, 2021

At Samsung Electronics Co., Ltd. (“Samsung”), we know how important privacy is to our customers. Samsung is the data controller for Samsung Smart TV Bug Bounty. The Data Controller Representative of Samsung in Turkey is “Samsung Electronics Istanbul Pazarlama ve Ticaret Ltd. Şti.”. We created this Privacy Notice (“KVKK Notification Text”) to make sure you understand how we collect and use your personal information.

Samsung aims to process personal data of Samsung Smart TV Bug Bounty users in accordance with the international data protection provisions and the provisions of the Law No. 6698 on Protection of Personal Data (the “KVKK- also known as LPPD in English abbreviation”) and other legislation.

We hereby inform you that your personal data that you have provided/will provide to Samsung and/or are obtained externally by any means by Samsung due to your being a Samsung Smart TV Bug Bounty user shall be processed by Samsung acting as of “Data Controller”:

* within the framework of the purpose for which they are required to be processed and as relevant, limited, and proportionate to such purpose,
* by preserving the accuracy and the most up-to-date state of such personal data as they have been provided to Samsung by you or otherwise,
* and by complying with the conditions stipulated in the KVKK.

With this KVKK Notification Text (Obligation to Inform Text), it has been aimed to continue and develop the activities carried out by Samsung in accordance with the principles contained in the KVKK.

Our Samsung Privacy Policy at <https://account.samsung.com/membership/terms/privacypolicy> also applies to your use of Samsung Smart TV Bug Bounty. Our Privacy Policy contains more information about how we use your data. It also includes information about your rights and how to contact us. Please read our Privacy Policy in addition to this KVKK Notification Text. However, this KVKK Notification Text shall always prevail over the Privacy Policy in relation to how we use your information for Samsung Smart TV Bug Bounty.

**WHAT INFORMATION DO WE COLLECT?**

Samsung shall process your personal data for the purposes and legal grounds specified in this KVKK Notification Text. If there is any change in the purpose for which your personal data are processed or in the legal grounds thereof, this KVKK Notification Text shall be updated and re-published by Samsung.

When you submit your vulnerability report to secbugbounty@samsung.com through Samsung Smart TV Bug Bounty, Samsung obtains and maintains information about you in various ways. Your personal data are collected through electronic media, via all kinds of information, documents and certificates you have submitted to our Company and collected through the application, both before and after the establishment of the contractual relationship and during such contractual relationship.

Information You Provide Directly

* your email address and any communication you sent to us;
* when your reward is determined, your name, contact information such as your address, phone number and email address, bank information such as bank name, bank address, bank account number, IBAN account number, Swift account number; and
* after your reward is awarded, your social network service link (ex. twitter link, blog address etc.)

**HOW DO WE USE YOUR INFORMATION?**

We use the information collected for the following purposes:

* to deal with the report you submit to us and communicate with you about more detailed vulnerability information;
* to reward you and verify your identity before transfer;
* to register your social network service link (ex. twitter link, blog address etc.) to announce your contribution (your name and SNS link)to Samsung Smart TV Bug Bounty via https://samsungtvbounty.com/HallOfFame.aspx;
* operate, evaluate and improve Samsung Smart TV Bug Bounty;
* protect against, identify and prevent fraud and other criminal activity, claims and other liabilities; and
* comply with and enforce applicable legal requirements, relevant industry standards and our policies, including this KVKK Notification Text and the Privacy Policy.

Samsung processes personal information for the purposes described above. Samsung’s legal basis to process personal information is outlined below:

Your personal data are processed being limited to the use of the related service/platform; in compliance with the legislation in force and the Law on Protection of Personal Data; by automated or non-automated methods;

* based on Article 5, paragraph 2 of the KVKK, sub-paragraph c), which stipulates ‘if it is necessary to process personal data of contractual parties, provided that such processing is directly related to the establishment or performance of the contract’, and sub-paragraph f) thereof, which stipulates ‘if it is mandatory to process personal data for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the data subject are not violated’:

and may be updated in line with our obligations arising from the legislation and the company policies.

Your personal data shall be kept for a reasonable period of time until the purpose for which they are processed ceases to exist or until the end of the legal time period specified in the relevant legislation, and in any case until the expiry of the statute of limitations.

**WHO DO WE SHARE YOUR INFORMATION WITH?**

The procedures and principles to be applicable to personal data transfers are set forth in Articles 8 and 9 of the KVKK, and the personal data of the data subject may be transferred to third parties in Turkey and/or abroad.

We will disclose your information internally within our business and to the following entities, but only for the purposes described above.

* Other parties when required by law or as necessary to protect Samsung Smart TV Bug Bounty: for example, it may be necessary by law, legal process, or court order from governmental authorities to disclose your information. They may also seek your information from us for the purposes of law enforcement, national security, anti-terrorism, or other issues that are related to public security;
* Other parties in connection with corporate transactions: we may disclose your information to a third party as part of a merger or transfer, acquisition or sale, or in the event of bankruptcy; and
* Other parties with your consent or at your direction: in addition to the disclosures described in this KVKK Notification Text, we may share information about you with third parties when you separately consent to or request such sharing.

**HOW LONG DO WE RETAIN YOUR INFORMATION AND WHERE DOES IT GO?**

How long your data will be retained depends on the legal basis relied upon to process your data. For example, data we process to perform our contract with you requires us to keep the data throughout the time you use Samsung Smart TV Bug Bounty. As long as you are an active user of Samsung Smart TV Bug Bounty, we will retain and process this data. Data necessary to reward you or verify your identity fall into this category.

Data we process to promote our business interests is only kept for as long as needed for the purposes for which it was collected. For example, this data may be collected to perform analytics so we can develop improvements to Samsung Smart TV Bug Bounty, or we may process data to keep a record of inquiries you made through or about Samsung Smart TV Bug Bounty to improve your customer service experience.

Please note, although we aim to retain your data for the time period described above, your data may be processed longer pursuant to applicable law. For example, if a specific statute mandates we require a certain piece of data, we will comply and retain that data until the required retention period expires.

As long as your data is retained by us your data will always be subject to appropriate safeguards.

Your use of Samsung Smart TV Bug Bounty will involve the transfer, storage, and processing of your personal information to other countries; such countries include, without limitation, countries in the European Economic Area and the Republic of Korea. All international data transfers are subject to legal requirements to ensure that your personal information is processed safely and as you would expect.

**YOUR RIGHTS UNDER KVKK**

**Data Subject’s Rights under KVKK**

In accordance with Article 11 of the KVKK, you may apply to Samsung and make requests on the following issues about your personal data:

1. Learning whether or not your personal data have been processed,
2. Obtaining information on the procedure, if your personal data have been processed,
3. Learning the purpose for which your personal data have been processed and whether or not they are used in line with such purpose,
4. Obtaining information about third parties to whom your personal data are transferred within Turkey or abroad,
5. Requesting correction of your personal data if they have been processed incompletely or inaccurately and requesting the notification of third parties to whom your personal data are transferred of the correction made in this respect,
6. Requesting deletion, destruction, or anonymization of your personal data if the reasons for which they are processed no longer exist and requesting the notification of third parties to whom your personal data are transferred of such deletion, destruction, or anonymization procedure,
7. Objecting to the occurrence of a result which is detrimental to you as a result of analyzing of your processed personal data exclusively through automatic systems,
8. Requesting indemnification for your damages which are caused by unlawful processing of your personal data.

Samsung or our Data Controller Representative shall receive and evaluate the data subject requests through the “Samsung Electronics Co., Ltd. Data Subject Application Form” available on https://www.samsung.com/tr/info/kvkk/. Samsung or our Data Controller Representative shall conclude your application free of charge in accordance with Article 13 of the KVKK according to the nature of the request, and within 30 (thirty) days at the latest. If the request is rejected, the reason(s) for rejection shall be notified to you in writing or electronically together with the relevant grounds.

**UPDATES TO THIS KVKK Notification Text**

This KVKK Notification Text may be updated to let you know about changes in how we collect and process your information in Samsung Smart TV Bug Bounty or changes in related laws. The date when the document was last updated is shown at the top of this KVKK Notification Text. You may access the most up-to-date version of this KVKK Notification Text on [https://www.samsungtvbounty.com/privacy-policy.html].

**Samsung SmartTV Bug Bounty Disclosure Policy**

Effective Date: September 25, 2020

**RESPONSIBLE DISCLOSURE**

All applicants should ensure that they understand and accept the responsible disclosure policy:

• Allow the Samsung Security Team the required time to revert before making any public disclosure of the research result.

• Do not violate any privacy laws, destroy data or interrupt Samsung services during research.