

Data Controller and Representative

In accordance with the Law on the Protection of Personal Data No. 6698 ("Law"), the Data Controller is Idenfit Information Services Industry and Foreign Trade Inc.

Principles for Processing Personal Data of Business Partners

As Idenfit Information Services Industry and Foreign Trade Inc., we have adopted the following principles:

- a) Processing in compliance with the law and integrity rules,
- b) Endeavoring to ensure accuracy and currency,
- c) Processing for specific, explicit, and legitimate purposes,
- d) Being relevant, limited, and proportionate to the purposes for which they are processed,
- e) Retaining for the period stipulated by the legislation or required for the purpose for which they are processed.

Information and Scope

As Idenfit in the capacity of the data controller, all types of special and general personal data acquired within the scope of our business relationships are processed in a measured and limited manner, in accordance with the data processing conditions specified in Articles 5 and 6 of Law No. 6698 on the Protection of Personal Data, based on our company principles, for the establishment, protection, and use of rights, due to the legal responsibility as the data controller, and the obligations arising from the performance of the contract. With this awareness, we attach great importance to processing special and general qualitative personal data acquired in business relationships in compliance with Law No. 6698 on the Protection of Personal Data, secondary regulations (regulation, communiqué, directive) put into effect and to be put into effect, and decisions to be taken by the Personal Data Protection Board, and in accordance with the binding decisions.

Processed Personal Data

The personal data that may be processed by us within the scope of the employment relationship and their explanations are as follows:

Identity Information: All identity information, nationality, marital status, place and date of birth, Turkish Republic ID number, gender, signature information, Social Security number, and similar data.

Contact Information: Phone number, alternative person's contact information for emergencies, address, email address, and similar data.

Education Information: Educational status, information about certificates, courses, and seminars attended within the relevant job scope, training received, and reference information, diploma details, curriculum vitae, and similar data.

Financial Information: Financial details, execution follow-up, debt information, bank details, and similar data.

Visual Data: Photographs processed for the security of work processes at our location, camera recording images.

Special Categories of Personal Data: Resume information, health reports, health declaration document, information in ID card/driver's license such as religion and blood type, and similar data.

Work Data: Registry number, job title, department and unit, job title, Social Security entry declaration, assignment documents, start date of employment, title, signature circulars, projects worked on, internet and company internal access logs, and similar data.

Processed data can include one or more of these depending on our employment relationship.

Purpose of Processing Personal Data

As the data controller, your special and general personal data acquired within the scope of our employment relationships may be processed for the following purposes and legal reasons:

Execution and continuity of the employment relationship, conduct of emergency management processes, conduct of information security processes, conduct of audit/ethical activities, conduct of activities in compliance with legislation, conduct of financial and accounting activities, provision of physical space security, conduct of assignment processes, tracking and conducting legal affairs, conduct of audit/investigation/intelligence activities, conduct of communication activities, conduct of business operations/auditing, conduct of occupational health/safety activities, conduct of logistics activities, conduct of procurement processes for goods/services, conduct of operational processes for goods/services, conduct of business relationship management processes, conduct of storage and archive activities, conduct of contract processes, tracking of requests/complaints, ensuring the security of movable assets and resources, conduct of supply chain management processes, ensuring the security of data controller operations, providing information to authorized individuals, institutions, and organizations, among others. These data will be processed within the personal data processing conditions and purposes specified in Articles 5 and 6 of the Law No. 6698 on the Protection of Personal Data.

Transfer and Purpose of Processed Personal Data

The personal data acquired by us within the scope of the employment relationship may be shared, as needed and to the extent required by the activity, with relevant legal parties, professional consultants our company receives services from, banks and insurance companies, institutions with which our company has commercial, administrative, or contractual relationships, and third parties such as business partners and affiliated offices for the purpose of conducting our business relationship, in accordance with the personal data processing conditions and purposes specified in Articles 5 and 6 of Law No. 6698, subject to limitations.

In these sharing processes, data processing conditions and purposes are acted upon in accordance with the principles of proportionality and data security.

Method of Personal Data Collection and Legal Basis

As a company, personal data is obtained in order to fulfill our legal obligations, perform the contract between your company and/or you, establish and protect rights, fulfill legal obligations, and for the legitimate interests of the company, within the legal framework of services defined in the Turkish Commercial Code No. 6102, Labor Law No. 4857, Turkish Code of Obligations No. 6098, Electronic Commerce Regulation Law No. 6563, and other relevant legislation.

The personal data requested from you and/or other representatives/employees representing your company is collected verbally, physically, or electronically by you and/or other representatives/employees of your company and transmitted to us. We also collect personal data through cameras placed in company buildings, either physically or electronically.

Personal Data Owner's Rights According to Law No. 6698, Article 11

As personal data owners, you have the following rights, and if you submit your requests regarding these rights to our company through the methods specified in the "Identit" Information Text, our company will respond to your request free of charge within thirty days, depending on the nature of the request. However, if a fee is stipulated by the Personal Data Protection Board, our company will charge the fee specified in the tariff determined by the Personal Data Protection Board. In this context, personal data owners have the right to:

- Learn whether personal data is being processed.
- Request information if personal data has been processed.
- Learn the purpose of processing personal data and whether they are used in accordance with their purpose.
- Know the third parties to whom personal data is transferred, whether domestically or abroad.

- Request correction of personal data in case it is incomplete or inaccurately processed and, within this scope, request notification of the correction transaction to third parties to whom personal data has been transferred.
- Request the deletion or destruction of personal data in the event that the reasons requiring its processing cease to exist, despite being processed in accordance with Law No. 6698 and other relevant laws, and, within this scope, request notification of the deletion or destruction transaction to third parties to whom personal data has been transferred.
- Object to the occurrence of a result against the person by exclusively analyzing the processed data through automated systems.
- In case personal data is processed unlawfully, request the compensation of damages suffered.

How Do We Protect Your Personal Data?

All necessary technical and administrative measures are taken to ensure the security of all personal data collected by Idenfit. In this context, we implement physical, technical, organizational, and managerial measures in accordance with the requirements of the Personal Data Security Guide published by the KVKK board, ISO/IEC 27001 Information Security, ISO/IEC 27701 Privacy Information Management standards, and in compliance with the European Union General Data Protection Regulation (GDPR) to prevent unauthorized access, misuse, disclosure, or alteration.

How Can You Exercise Your Rights Regarding Personal Data?

In accordance with Article 13, Paragraph 1 of the Personal Data Protection Law, you can exercise your rights mentioned above. To do so, you can submit your request to exercise rights related to the "Regulation on the Principles and Procedures of Application to the Data Controller," published on March 10, 2018, number 30356, using the methods and information below:

Required information in the content of the application:

1. Full name of the applicant.
2. If the applicant is a citizen of the Republic of Turkey, the Turkish Identification Number (TC) or, if not, the Passport number along with the nationality.
3. Residential or business address of the applicant.
4. Email address, phone, or fax for communications related to the notification.
5. Subject of the request.
6. Information and documents related to the subject of the request.

Methods of Application for Data Subjects:

1. The applicant can personally deliver a sealed envelope containing the completed "Application Form" to the "Idenfit" address, with the note "Request for Information According to the Personal Data Protection Law," by hand at our central location, documenting the delivery with a protocol.
2. The applicant can send a notification to the "Idenfit" address through a notary, but the note "Request for Information According to the Personal Data Protection Law" must be added to the notification envelope.
3. Using the "Secure Electronic Signature" defined in Law No. 5070 on Electronic Signatures, the applicant can personally submit the application to our company's Registered Electronic Mail at idenfitbilisim@hs01.kep.tr and also exclusively to the email address kvk-komite@idenfit.com, defined only for this matter. In the subject line, include the note "Request for Information According to the Personal Data Protection Law."

You can access the application form related to your mentioned rights here.

How Long Does It Take to Respond to Your Requests Regarding the Processing of Your Personal Data?

Requests for rights related to your personal data will be evaluated, and a response will be provided within a maximum of 30 (thirty) days from the date of receipt. In case of a negative evaluation of your application, the reasons for rejection will be sent to the email address or mailing address you specified in the application.

Changes to Our Privacy Notice

In the event that we make changes to our Privacy Notice, we will publish the revised notice here along with the updated revision date. If we make significant changes to our privacy practices that would substantially alter our Privacy Notice, we may inform you through methods such as sending an email or posting a notification on our corporate website and/or social media accounts before the changes take effect.

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