

	<b>CUSTOMER DISCLOSURE TEXT</b>	Document No:	KVK.F010
		Effective Date:	01.10.2021
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This Disclosure Text has been prepared by VBT Yazılım A.Ş. (“Our Company”), the Data Controller located at QUICK TOWER, İçerenköy Mh. Umut Sk. No:10-12 K:13 D:57-60 PK:34752 Ataşehir/İstanbul, in order to inform our customers and to fulfil the disclosure obligation within the scope of the Personal Data Protection Law No. 6698 (KVKK) and other relevant legislation.

Our Company's Policies and Disclosure Texts regarding the Protection of Personal data are available at <https://www.vbt.com.tr/en/page/personal-data-protection> .

### 1. PERSONAL DATA COLLECTION METHODS AND LEGAL REASONS

Your personal data specified below,


- i) **Identity Data:** Name, surname, mother-father's name, date of birth, T.R. identity number, gender, marital status, identity card series number, nationality information, passport information, position and title information, family relatives' information.
- ii) **Communication Data:** Phone number, e-mail address, address information, internal company communication information (company phone number, internal phone number, corporate e-mail address, registered e-mail address).
- iii) **Financial Data:** Bank IBAN number,
- iv) **Visual and Audio Data:** Photographs, camera recordings of real persons.

are collected in accordance with the relevant legislation through the following methods;

- By e-mail,
- Through cameras,
- Through the call centre,
- By phone,
- By official documents,
- Electronic form (in-company application screen),
- In writing,
- Written form (company printed forms),
- Physically (in person),
- Through company applications,
- From other activities,
- Through seminars, Product Launches, events, etc.
- From other units,
- Through cargo,
- From Plaza Information centre,
- Through e-Invoice System,
- Through accounting software

and processed for the following legal reasons;

- Provided that the data processing is not prejudiced against the fundamental rights and freedoms of the relevant person, the processing of data is mandatory for the legitimate interests of the data controller

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- To fulfil for the data controller’s legal obligations
- Data processing is mandatory for the establishment, exercise or protection of a right
- Provided that it is directly related to the establishment or execution of a contract, the processing of personal data belonging to the parties to the contract is necessary
- Explicit consent

## 2. PERSONAL DATA PROCESSING PURPOSES

Your personal data will be processed by the Company for the following purposes within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the KVKK:

- Execution of activities in accordance with legislation,
- Execution of finance and accounting activities,
- Execution of storage and archive activities,
- Providing the security of data controller operations,
- Providing the security of movable assets and resources,
- Execution of risk management processes,
- Providing physical space security,
- Execution of communication activities
- Receiving and evaluating suggestions for improving business processes,
- Following up requests/complaints,
- Execution of auditing business activities,
- Execution of contract processes,
- Execution of information security processes,
- Execution of marketing processes,
- Organization and event management,
- Execution of Customer Loyalty Processes,
- Execution of customer relationship management processes
- Execution of Sales processes,
- Execution of development processes,
- Execution of After Sales Support activities,
- Execution of Customer Satisfaction processes,
- Execution of Access Authorizations

## 3. TO WHOM AND FOR WHAT PURPOSE CAN YOUR PERSONAL DATA BE TRANSFERRED

Personal data of customers may be transferred or shared to the following institutions and abroad provided that sufficient and effective measures are taken in accordance with the data transfer and processing conditions specified in Articles 8 and 9 of the Law and the security and confidentiality principles specified in the legislation, suppliers, shareholders, authorized dealers, private law entities from which services are received (in matters such as security, training, audit, event and organization, health, occupational safety, law, etc.), independent auditing institutions, financial institutions, business partners at home and abroad, especially direct and indirect affiliates, storage, archiving, information technology support companies at home and abroad (server, hosting, program, cloud computing), legally authorized public institutions and private law entities.

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#### 4. STORAGE PERIOD OF YOUR PERSONAL DATA

In accordance with the provisions of the KVKK, when the purpose requiring processing of your personal data as per Article 7 of the KVKK is eliminated and/or the limitation periods required for us to process and store your data as per the legislation expire, your personal data will be deleted, destroyed or anonymized according to our Personal Data Storage and Destruction Policy.

#### 5. YOUR RIGHTS AS A PERSONAL DATA OWNER

The Company discloses you of your rights in accordance with Article 10 of the Law and provides guidance on how to use these rights and carries out the necessary internal functioning, administrative and technical arrangements for all of these. In accordance with Article 11 of the KVKK, the persons whose Personal Data is collected has the rights;

- To learn whether their personal data has been processed,
- To request information about their personal data if it has been processed,
- To learn the purpose of processing their personal data and whether it is used in accordance with its purpose,
- To know the third parties to whom their personal data has been transferred domestically or abroad,
- To request correction of their personal data if it has been processed incompletely or incorrectly,
- To request the deletion or destruction of their personal data within the framework of the conditions stipulated in Article 7 of the Law,
- To request that the transactions made pursuant to subparagraphs (d) and (e) of Article 11 of the Law be notified to third parties to whom their personal data has been transferred,
- To object to the emergence of a result against the person by analysing the processed data exclusively through automated systems,
- To request compensation for the damages incurred due to the processing of their personal data in violation of the KVKK.

##### 6.1. Method of Using the Rights of the Personal Data Owner,

The personal data owner must send their application regarding their personal data to:

VBT Yazılım Anonim Şirketi

QUICK TOWER, İçerenköy Mh. Umut Sk. No:10-12 K:13 D:57-60

34752 Ataşehir/İstanbul

in writing and with a wet signature or to our registered e-mail address [kvkk@vbt.com.tr](mailto:kvkk@vbt.com.tr) with a secure electronic signature.

The application must include; for Republic of Turkey citizens, Turkish Republic Identity Number, for foreigners Nationality, Passport number and Turkish Identity number if any, subject of the request, name, surname, place of residence or workplace address for notification, e-mail address for notification if any, telephone and fax number and signature. All Information and related documents about the subject should be added to the application.

It is not possible for third parties to make a request on behalf of personal data owners.

In order for a person other than the personal data owner to make a request, there must be a copy of the notarized power of attorney issued by the personal data owner on behalf of the person who will make the application.

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### **6.2. The Company's Response Method and Time to Applications**

In written applications, the date on which the document is notified to the data controller or its representative will be taken as the application date. In applications made by other methods, the date on which the application reaches the data controller will be taken as the application date. The application depending on the nature of the request will be finalized within thirty days at the latest, free of charge. However, if the transaction requires an additional cost, the fee in the tariff determined by the Board/Kurul may be charged.

If our Company suspects the identity of the applicant, it may request verification information from the relevant person

### **6.3. Right of Data Owner to Complain the Company to the Board/Kurul.**

if your application is rejected by our Company or if you find our response insufficient or if we do not respond to your application on time; Data Owner can complain the Company to the Board/Kurul within thirty days from the date you learn of our Company's response or in any case within sixty days from the date of application according to Article 14 of the KVKK.