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1. PURPOSE AND SCOPE

The purpose of this policy is as a data controller within the scope of the Law No. 6698 on the Protection of Personal Data and other relevant legislation, to inform data owners about the legal reasons and purposes of collecting personal data collected by our company, the methods of collection and processing purposes, with whom and for what purposes we can share the data owners' information, and the rights of data owners and the ways to apply to the company in order to protect these rights.

Data Subjects whose personal data is collected and processed by fully or partially automatic or non-automatic means are within the scope of this policy. Since the data of legal entities is not considered as "personal data" according to the relevant legislation, they are outside the scope of this Policy.

2. DEFINITIONS

Presidency/Başkanlık: Presidency of the Personal Data Protection Authority.

Board/Kurul: Personal Data Protection Board.

Institution/Kurum: Personal Data Protection Institution.

Law/KVKK: Law No. 6698 Personal Data Protection.

Data Controllers Registry: Data Controllers Registry kept by the Presidency/Başkanlık.

VERBİS: The information system that is used by Data Controllers to apply for registry, and perform other registry related transactions; which is created and managed by the Başkanlık/Presidency and accessible via the internet.

Information Text: Information statement given to the data subject about the purpose, method of data collection, storing duration, how it is stored and rules of data sharing with third parties.

Inventory: Inventory is the list of personal data processing activities related with the business processes of the Data Controller. The purposes of data collection, processing reasons, categories, storing periods, groups of persons subject of the data, the rules of data sharing with internal and foreign data recipients and the precautions for data security are listed in relation with the Business Processes.

Data Subject: Natural person whose personal data is processed.


Personal Data: Any information related to an identified or identifiable natural person. For example; name-surname, TC ID, e-mail, address, birth date, IBAN no, etc.

Processing of Personal Data: Operations like obtaining, recording, storing, preserving, changing, reorganizing, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data, performed on personal data, such as in whole or in part, by automatic or non-automatic means, provided that it is part of any data recording system.

Special Personal Data: Personal data related with race, ethnic origin, religion, sect or other belief, political opinion, philosophical belief, dress code, association, foundation or union membership, health, sexual life, criminal conviction and security measures, biometric and genetic data.

Data Controller: A natural or legal entity who determines the purposes and means of personal data processing and responsible from management of data recording system.

Data Processor: A natural or legal entity who processes personal data on behalf of the data controller based on the authority granted by the data controller

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Data Controller Contact Person: The natural person declared by the Data Controller during registration in the Registry, for communication with the Institution/Kurum regarding the obligations of legal entities resident in Turkey or not in Turkey, within the scope of the Law and secondary regulations to be issued based on this Law.

Anonymization: Processing of a personal data in a way that it cannot be associated with a natural person's identity.

Deletion: The process of making personal data inaccessible and non-reusable for the relevant users.

Destruction: The process of destroying relevant users' personal data by rendering it inaccessible, irreversible and non-reusable by anyone.

3. BASIC PRINCIPLES IN PROCESSING PERSONAL DATA

The Company, being aware that processing personal data is prohibited as a rule, processes Personal Data only within the explained limits by the legislation, based on the following reasons:

a. Explicit Consent of the Personal Data Owner

One of the conditions for processing personal data is the explicit consent of the personal data owner. The explicit consent of the personal data owner must be taken on a specific subject, based on information and with free will. Data is processed within the scope of the explicit consent of the data owner and for the specified purposes in the explicit consent. As a rule, if the conditions specified in subparagraphs b, c, d, e, f, g and h of this article are present, it is not necessary to obtain the explicit consent of the personal data owner.

b. Clear Provision of Laws

If it is clearly provided for in the law, the personal data of the data owner will be processed in accordance with the law. In cases where data processing is permitted by law, data will be processed limited to the reasons and data categories specified in the relevant law.

c. Failure to Obtain the Explicit Consent of the Data Subject Due to Actual Impossibility

The Personal Data of the person who is unable to express his/her consent due to actual impossibility or whose consent cannot be recognized as valid, for the protection of the life or physical integrity of another person can be processed.

d. Direct Relation to the Establishment or Execution of a Contract

The personal data of belonging parties, if it is necessary and directly related to the establishment or execution of a contract can be processed. (Provided that the person whose data will be processed based on the establishment or execution of the contract is one of the parties to the contract.)

e. Fulfilment of Legal Obligations

Personal Data can be processed by the Company if it is mandatory to fulfil its legal obligations.

f. Publicization of Personal Data by the Personal Data Owner


If the data owner's personal data has been made public by him/her, the relevant personal data may be processed limited to the purpose of making public.

g. Data Processing is Mandatory for the Establishment or Protection of a Right

If data processing is necessary for the establishment, usage or protection of a right, the data owner's personal data can be processed.

h. Data Processing is Mandatory Due to Legitimate Interests

If data processing is mandatory for the legitimate interests of the Company, the personal data of the data owner can be processed by avoiding to harm the fundamental rights and freedoms of the personal data owner,

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Our Company meets the general principles and conditions set forth in the legislation regarding the protection and processing of personal data and acts in accordance with the principles listed below in order to ensure that personal data is processed in accordance with the Constitution and the KVKK:

3.1. Compliance with Law and the Rule of Honesty

Our company processes personal data in accordance with the Article 4 of the KVKK depending on the law and the rule of honesty and aims to balance the conflicting interests by considering the “justified interest”.

Transparency and honesty are taken as basis while informing the Data Owners about the purpose of usage and process of personal data and the data is processed within this framework.

3.2. Commitment to Purpose, limitedness and Proportionality

Our company declares the purposes for which it will process the data of the relevant person while getting explicit consent. Company collects personal data at a minimum required level and avoids processing non related and not needed data for the processing purpose.

3.3. Ensuring that Personal Data is Accurate and Up-to-date when Necessary

While our company takes the necessary measures in its procedures to ensure that the personal data it processes is accurate and up-to-date, it takes into account the statements of the relevant person and obtains confirmation of its up-to-datedness when necessary.

3.4. Processing of Personal Data for Specific, Clear and Legitimate Purposes

Our company processes personal data whose content and scope are clearly defined. Depending on the framework of the legislation, the flow of commercial life within the legitimate purposes determined to continue its activities.

3.5. Storing Personal Data for foreseen or necessary period of time for the Purpose of Processing

If there is a period foreseen in the relevant legislation for the storage of personal data, our Company complies with these periods, otherwise it stores personal data for the period needed for the purpose of processing. Personal Data is deleted, destroyed or anonymized upon the expiration of the period or the elimination of the reasons that require processing.

4. PROCESSING OF SPECIAL PERSONAL DATA


Special personal data is processed if there is explicit consent, or in cases where the legislation makes it mandatory by taking necessary administrative and technical measures as prescribed by the laws and the Board/Kurul.

Special personal data related to health and sexual life can be processed by persons or authorized institutions and organizations under a confidentiality obligation for the purpose of protecting public health, conducting preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing. For this reason, we only process the special data of our employees if they have explicit consent.

5. PERSONAL DATA OWNERS, RELATED PERSONS

“Related Person” is defined by the KVKK as the person whose personal data is obtained. Within the scope of our company's activities, the personal data of the following persons are obtained and processed in accordance with the relevant legislation:

- Employee,
- Employee Candidate,
- Intern
- Shareholder – Partner
- Supplier Official

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- Visitor
- Product or Service Recipients
- Potential Product or Service Recipients
- Foreign Employee
- Trainer
- Independent Board Member
- Approving Person

6. PERSONAL DATA ACQUISITION CHANNELS

Our Company may collect personal data of the persons mentioned in Article 4 of this Policy verbally, written or electronically through automatic or non-automatic methods and similar means. In this context; personal data acquisition channels are specified below.

- By E-mail
- Through Cameras
- Written
- Official Documents
- Hand Delivery
- Written Forms (company's printed forms)
- Through Call Centre
- Through Personnel Attendance Control System
- Through Company Website
- Verbally
- By phone
- Electronic Forms (in-company application screen)
- Through Company Applications
- Through Cargo Shipments
- From Other Activities
- Through Organized Training, Organization and Similar Events
- From Other Units
- Intermediary Company (agency etc.)
- From Plaza Correspondence Distribution Point
- Through E-Government etc. Public Applications

7. PURPOSES OF PERSONAL DATA PROCESSING

Our company processes personal data for similar purposes, but not limited to the following.

- Management of Emergency Management processes
- Management of Information Security processes
- Management of Audit and Ethical processes
- Management of Access Authorizations
- Management of Training Activities
- Management of Activities in Accordance with Legislation
- Management of Finance and Accounting processes
- Management of Company Loyalty Processes
- Manage Physical Space Security
- Management of Assignment Processes

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- Manage and follow Legal Affairs
- Management of Purchasing Processes
- Management of After-Sales Support Services
- Management of Sales Processes
- Management of Product and Services Production and Operation Processes
- Management of Customer Satisfaction processes
- Management of of Customer Relationship processes
- Organization and Event Management
- Management of Performance evaluation
- Management of Risk Management Processes
- Management of Storage and Archiving
- Management of Insurance Activities
- Management of Contracts
- Management of Requests / Complaints
- Management of the Security of Movable Goods and Resources
- Managing Security of Data Controller Operations
- Managing Foreign Personnel Work and Residence Permit processes
- Management of Investment Processes
- To provide Information to Authorized Persons, Institutions and Organizations
- Execution of Management Activities
- Management of Employee Candidates Applications
- Management of Selection and Placement for Employee Candidates/Interns/Students
- Manage Employee Satisfaction and Loyalty Processes
- Manage Employee Benefits and Benefits Processes
- Fulfilment of Employees' Obligations Arising from Employment Contracts and Legislation
- Manage Wage Policy
- Manage Marketing Processes of Products / Services
- Manage Communication Activities
- Planning of Human Resources Processes
- Manage and Supervise Business Activities
- Managing Occupational Health and Safety Activities
- Managing Business Continuity Activities
- Manage suggestions for continuous improvement of Business Processes

8. STORAGE OF PERSONAL DATA

Personal data obtained by our Company is stored securely in physical or electronic environments for an appropriate period of time in order for our Company to carry out its commercial activities. Within the scope of these activities, our Company complies with the obligations specified in all relevant legislation, especially the KVKK, regarding the protection of personal data.

if the reasons requiring processing are eliminated without prejudice to the provisions in other laws regarding the deletion, destruction or anonymization of Personal Data, Company deletes, destroys or anonymizes the data it processed, ex officio or upon the request of the Data Owner.

You can find the conditions and periods regarding storage, destruction and anonymization of Personal Data in our Storage and Destruction Policy, which was created in accordance with the

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Regulation on the Deletion, Destruction or Anonymization of Personal Data dated 28.10.2018 and numbered 30224.

9. PROTECTION OF PERSONAL DATA

In accordance with Article 12 of the KVKK, our Company has taken the necessary technical and administrative measures to prevent the unlawful processing and accessing the personal data processed. While the security measures appropriate to the nature of personal data are taken, special personal data are protected by stricter security measures.


Within this scope the necessary audits are performed internally and by independent auditors to ensure that personal data is stored securely.

9.1. Technical Measures

- Measures are taken for network and application security.
- VPN is used for personal data transfers via network.
- Security measures are taken for procurement, development and maintenance of Information Systems.
- Security of personal data stored in the cloud is ensured.
- Authorization matrix has been created for employees.
- Access logs are kept regularly.
- Corporate policies are prepared and implemented regarding Access, Information Security, Usage, Storage and Destruction.
- Up-to-date anti-virus systems are used.
- Firewalls are used.
- Log records are kept in a way that prevents user intervention.
- Intrusion detection and prevention systems are used.
- Penetration tests are performed periodically.
- Cyber security measures have been taken and their implementation is constantly monitored.
- Encryption is used.
- Data loss prevention software is used.
- Policies are applied to ensure data security during remote working.

9.2. Administrative Measures

- Employees are periodically trained on Data Security.
- Disciplinary regulations that include data security provisions are in place for employees.
- The Authorizations for employees whose duties changed or leave their jobs are immediately revoked.
- Personal data security policies and procedures have been announced and implemented.
- Policies and procedures for special personal data security are determined and implemented.
- Personal data is reduced as much as possible.
- Personal data security breaches are reported immediately.
- Personal data security is monitored.
- Security of physical environments containing personal data against external risks (fire, flood, etc.) is ensured.
- Physical security of environments containing personal data is ensured.
- Periodic and unplanned internal audits are conducted.
- Signed contracts include data security provisions.
- Awareness of data processing service providers is ensured on data security.
- Audits are conducted at regular intervals on data security of data processing service providers.

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10. TRANFER OF PERSONAL DATA

Our Company complies with the conditions set forth in the KVKK regarding the sharing of personal data with third parties, without prejudice to the provisions of other laws. In this context, personal data is not transferred to third parties without the explicit consent of the data owner.

However, if one of the following conditions regulated in the KVKK exists, personal data may be transferred without the explicit consent of the data owner:

- Clearly prescribed by the laws,
- The Personal Data of the person who is unable to express his/her consent due to actual impossibility or whose consent cannot be recognized as valid, for the protection of the life or physical integrity of another person,
- It is necessary to process personal data belonging to the parties on the contract, provided that it is directly related to the establishment or performance of a contract,
- It is mandatory for the data controller to fulfil its legal obligation,
- It is made public by the data owner himself,
- Data processing is mandatory for the establishment, exercise or protection of a right,
- Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data owner.

In the transfer of special personal data, we comply with conditions specified in in processing this data.

10.1. Domestic Transfer of Personal Data and Relevant Institutions

Our Company carefully complies with the conditions set forth in the KVKK regarding the sharing of personal data with third parties, without prejudice to the provisions of other laws. Within this framework, personal data is not transferred to third parties by our Company without the explicit consent of the data owner. However, in cases stipulated in Articles 5 and 6 of the KVKK, it may be possible to transfer Personal Data without the explicit consent of the person concerned.

In order for our Company to continue its commercial existence and to achieve the above-mentioned purposes, our Company may share your personal data with the following domestic parties within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the KVKK;

- **With Legally Authorized Public Institutions and Organizations**

When required by law or when we need to protect our rights, we may share your personal data with relevant official, judicial and administrative authorities (e.g., tax offices, law enforcement agencies, courts and enforcement offices).

- **With Natural Persons or Private Legal Entities**

Personal data may be shared for a limited purpose as requested by private legal entities authorized to receive information and documents from our Company in accordance with the relevant legislation provisions within the scope of their legal authority (e.g., Occupational Health and Safety Company, Banks, Insurance Companies, Auditors, Lawyers).

- **With Suppliers and Business Partners**

We may share data with our Suppliers and Business Partners in order to conduct our commercial activities.

- **With Customers**

We may share your Personal Data with our Customers. This sharing is done limitedly for the execution of sales, contract and post-contract support services.

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10.2. Transfer of Personal Data to Abroad

Regarding the transfer of personal data abroad, the explicit consent of the data owner is sought in accordance with Article 9 of the KVKK.

Our Company may transfer personal data abroad without the explicit consent of the data owner, if the country is in the "Sufficient Protection List" by announced by Board/Kurul.

If the country to which the transfer will be made has not been listed by Board/Kurul among the countries with sufficient protection, our Company and the data controller/data processor in the relevant country will commit in writing to provide adequate protection and apply to Kurul /Board to get permission for data transfer.

11. RIGHTS OF PERSONAL DATA OWNERS

The Company informs you of your rights in accordance with Article 10 of the KVKK; provides guidance on how to use these rights and carries out the necessary internal functioning, administrative and technical arrangements for all 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.

11.1. 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 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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11.2. 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

11.3. 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.

12. OWNERSHIP and COMPLIANCE

The Company Data Controller is responsible for the implementation and monitoring of this Policy. If the Policy is updated, the update will enter into force on the date it is approved and the most up-to-date version of the policy will be published on the company website.