

# Remote Connection Data Protection Policy

## 1. Identity of the data controller

ARGELA Yazılım ve Bilişim Teknolojileri San. Tic. A.Ş. (“Argela”) processes, stores, and transfers any personal data it holds in accordance with Turkish Law No. 6698 on the Protection of Personal Data (the “KVKK”) and in line with its commitment to the security of your personal data. This Data Protection Policy regarding your personal data collected, stored, and processed by Argela in its capacity as data controller, has been drafted in order to fulfill Argela’s legal obligations as per Article 10 “Data Controller’s Obligation to Inform” of the KVKK, and the Communiqué on the Rules and Principles to Comply with when Fulfilling the Obligation to Inform, as well as to ensure compliance with Argela’s principles of accountability and transparency.

The terms “personal data”, “sensitive personal data”, and “data processing” used in this Data Protection Policy reflect the terminology used in the KVKK. The term “personal data” cited in the KVKK refers to any information relating to an identified or identifiable natural person, while the term “processing of personal data” refers to any transaction conducted with data, including acquisition, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying, or preventing the use of personal data by fully or partially automated, or non-automatic means, provided that the transaction is conducted within a data recording system.

**Data subject:** You, as a person whose personal data is processed by Argela, are considered a “data subject” under Turkish law due to your participation in remote company meetings/training sessions/events and similar activities.

**Data controller:** Argela Yazılım ve Bilişim Teknolojileri San. Tic. A.Ş. (“Argela”) determines the purposes for and means of processing your personal data and is responsible for the establishment and management of the data recording system in its capacity as the “data controller”.

Full address: Reşitpaşa Mah. Katar Cad. ARI Teknokent 3 No:4 İç Kapı No:502/601-604 Sarıyer, Maslak (Istanbul, Turkey)

email address: [kvkk@argela.com.tr](mailto:kvkk@argela.com.tr)

## 2. YOUR PROCESSED PERSONAL DATA, PURPOSES FOR PROCESSING IT, AND LEGAL GROUNDS

PERSONAL DATA	PURPOSES FOR PROCESSING	FOR	LEGAL GROUNDS
Your recorded questions if you ask a question over the cloud or via similar remote written, audio, video communication programs; your audio, video, and image recordings if you turn on the camera and microphone; your participation details	Execution/supervision support/meeting/training activities	of	As per your explicit consent Article 5/1 of the KVKK

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## 3. To whom processed personal data can be transferred and for what purposes

Your questions that may be recorded during remote support/training/meeting activities organized by our Company, via Microsoft Teams or similar remote written, audio, video communication programs and your audio, video, and image recordings if you turn on the camera and microphone:

- will be transferred to Microsoft Teams, Zoom, Skype Business, or similar communication programs for archiving purposes
- may be transferred to the company storage area or the program portal, if necessary, for archiving purposes

As these programs are hosted abroad, your personal data will be transferred to cloud servers located abroad.

If requested within the framework of Article 28/1 of the KVKK, your personal data can be shared with the relevant authorities, whereby the obligation to inform you and your explicit consent are waived.

In addition, in unforeseen circumstances, your personal data may be shared with public institutions specified under Turkish Law, within the scope and limitations stipulated by the Law, if requested in cases expressly stated by the Law.

Your personal data is not shared with any institution, person or organization other than those we need to as per our legal obligations whereby the obligation to inform and your explicit consent are waived.

## 4. Methods of collecting personal data and legal grounds

Your questions that may be recorded during remote support/training/meeting activities via cloud or similar remote written, audio, video communication programs, or your audio, video, and image recordings if you turn on the camera and microphone, are collected automatically as per your express consent via the respective program.

## 5. Your rights regarding the protection of personal data

Under the KVKK, you have the right to learn whether or not your personal data has been processed, request information if it has been processed, find out why it has been processed and whether it is being used by us in accordance with the cited purposes, learn about third parties, both at home and abroad, to whom it has been transferred, request correction if it has been incompletely or incorrectly processed, request that it be deleted or destroyed or anonymized in the event that the reasons that justified its processing no longer exist, request that third parties to whom your personal data has been transferred be notified in such cases or in case of a correction, raise an objection if you believe that the analysis of your processed data by means of exclusively automated systems

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produces unfavorable results for you, and request a redress if you suffer a loss due to unlawful processing of your data.

Using one of the following means, you can submit the Form for Requesting Information from the Data Controller available under the **ABOUT US/PDPL Policies and Forms** tab on <https://www.argela.com.tr> to request information on the use of your personal data:

- by visiting the following address in person: Reşitpaşa Mah. Katar Cad. ARI Teknokent 3 No:4 İç Kapı No:502/601-604 Sarıyer, Maslak, İstanbul where we can verify your ID
- by emailing our Company's **KEP** (registered electronic mail) address [argela@hs09.kep.tr](mailto:argela@hs09.kep.tr)
- by emailing [kvkk@argela.com.tr](mailto:kvkk@argela.com.tr) with your secure electronic or mobile signature
- via any other method stipulated in the KVKK and applicable legislation, so long as we can verify your ID

In accordance with Article 13 of the KVKK, the Company will respond to requests for information free of charge, as soon as possible, depending on the nature of the request and, in any case, within 30 (thirty) days at the latest. If the transaction incurs a fee, 1 TL will be charged per page. In the event that the request is rejected, the reason(s) for the rejection shall be specified in writing or electronically.

You can find more detailed information on what to look out for when requesting information in the Communiqué on the Rules and Principles for Requesting Information from the Data Controller imposed by the Personal Data Protection Authority.