

# Website 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 you having filled out the form on our website and shared your data.

**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)

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

PERSONAL DATA	PURPOSES FOR PROCESSING	LEGAL GROUNDS
Name/surname, phone number, email address, message, and subject of the message	Contacting you and processing your application/responding to your question	Under the data controller's legitimate interest Article 5/2/f of the KVKK

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

Your personal data will be transferred to the Sales/Marketing, Human Resources and/or Information Processing Departments, depending on the reason why you contacted us.

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 waved.

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

Your personal data may be collected through automated means using any information communicated by you, based on the legal reason for the legitimate interest of the data controller as specified in Paragraph 2, Article 5 of the KVKK.

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## 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 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 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

Depending on the nature of your request, all information and documents used for identification must be provided to us in a complete and accurate manner. If the requested information and documents are not properly provided, Argela may have difficulties carrying out the complete and high-standard research necessary to process your request. In such cases, Argela reserves its legal rights. For this reason, your application should be sent with all the requested information and documents to allow you to be identified in line with the nature of your request.

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.