

Data Protection Policy for customers



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 customer by us due to your service/product purchases from our Company and are a "data subject" under Turkish law.

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

2. Your processed personal data, purposes for processing, and legal grounds

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PERSONAL DATA	PURPOSES FOR PROCESSING	LEGAL GROUNDS
Name/surname, Turkish citizenship number, tax ID number, title, phone number, business address, home address, PO for sales, bank account information/IBAN, invoice amount, vehicle photographs, signature circular, signature statement, copy of ID, copy of driver's license	Follow-up processes for invoice amounts/debts owed Sales processes for goods/services	Signing/conclusion of contracts Article 5/2/c of the KVKK
Name/surname, title, business phone number, email address, company information	Communication activities	Signing/conclusion of contracts Article 5/2/c of the KVKK
Name/surname, Turkish citizenship number, tax ID number, bank account information/IBAN	Banking processes	Signing/conclusion of contracts Article 5/2/c of the KVKK
Name/surname, Turkish citizenship number, tax ID number, title, business address	Written statement processes Finance and accounting affairs	Occasions when it is obligatory for the data controller to fulfill their legal obligations Article 5/2/ç of the KVKK
Name/surname, Turkish citizenship number, tax ID number, passport number, title, copy of driver's license, copy of ID, phone number, home address, business address, email address, bank account information/IBAN, salary information, signature circular, signature statement	Contract processes	Signing/conclusion of contracts Article 5/2/c of the KVKK
Name/surname, business address, title, phone number, email address, country and location information, information on platforms such as LinkedIn, etc. (CV, career history), project information	Improving business development processes for overseas sales	Signing/conclusion of contracts Article 5/2/c of the KVKK
Name/surname, Turkish citizenship number, copy of ID, tax ID number, passport number, license plate, date of birth, title, copy of driver's license, phone number, home address, business address, email address, social security number, bank account	Litigation processes/ follow-up and execution of legal affairs/	Occasions when it is obligatory for the data controller to fulfill their legal obligations Article 5/2/ç of the KVKK

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information/IBAN, salary information		
Name/surname, title, company signature circular, organizational chart, company references, shareholding structure, bank account number, financial profile information	Tender processes Sales processes for goods/services	Occasions when it is obligatory for the data controller to fulfill their legal obligations Article 5/2/ç of the KVKK
Name/surname, Turkish citizenship number, email address, IP address	Project and product management processes/ After-sales support services for goods/services	Signing/conclusion of contracts Article 5/2/c of the KVKK
Name/surname, phone number, network location, mobile phone brand/model, web history, details of services used (SMS, MMS, IMSI, MSISDN, etc.), IP address, service usage statistics, internet applications used (Facebook, YouTube)	Data security processes/ after-sales support services for goods/services	Signing/conclusion of contracts Article 5/2/c of the KVKK
Name, surname, title, phone number, email address, business address, company information obtained through fairs attended or through memberships at organizations	Support processes for marketing activities, marketing processes	When the data subject has made their details public Article 5/2/d of the KVKK
Name/surname, email address, LinkedIn profile information, employer	Marketing analysis studies	As per your explicit consent Article 5/1 of the KVKK
Name/surname, title, phone number, email address, business address, industry information, company information, business card	Celebration and event management	As per your explicit consent Article 5/1 of the KVKK
Name/surname, title, business card, phone number, business address, industry information	Marketing processes Celebration and event management	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 personal data can be shared with official institutions, business partners of our Company, and the group of companies with which our Company is affiliated, limited to the purposes cited in Article 2 of this Data Protection Policy and the grounds for data sharing as per Turkish Law and the respective regulations.

Your data, as specified in Article 2, will only be transferred abroad – where it is kept on cloud servers and transferred to overseas companies, in particular Netsia Inc., a subsidiary of our Company – with your explicit consent.

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 will not be shared with any institution, person, or organization other than those required 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 personal data can be collected based on your explicit consent as per Paragraph 1, Article 5 of the KVKK, as well as legal grounds, such as the establishment or performance of a contract, obeying the legal obligation of the data controller, and the data subject making the personal data public themselves as cited in Paragraph 2, Article 5 of the KVKK, through automated or non-automated means using any information communicated by you in writing or orally.

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. You can submit your legal requests and any questions regarding your personal data and any of your requests for such information to the Human Resources Department using the Form for Requesting Information from the Data Controller accessible under the **ABOUT US/PDPL Policies and Forms** tab on our website <https://www.argela.com.tr/>.