

## **Clarification Text For The Personal Data Protection Law**

Innotim Yazılım LLC ("Company"), which is a pioneer in automation driven cybersecurity technologies, serves many institutions and organizations domestically and abroad with its new and integrated approach in the field of information technologies. For the company, which works on security services in the field of information technologies, protecting personal data is extremely important.

Company has set a target to act in accordance with the Personal Data Protection Law ("PDPL") numbered 6698 that is in force in Turkey and with other legal practices accepted in the international arena as well. In this context, this Clarification Text For The Personal Data Protection Law ("Clarification Text") has been prepared in order to enlighten the relevant persons regarding general conditions regarding how and for what purpose the Personal Data is processed, how they are protected and how long they are stored by the company, from its customers, potential customers, suppliers, business partners and their employees and officials, visitors, employees, ex-employees and candidate employees, and also to third parties whose personal data is processed for business transactions while maintaining their business relations with the company.

All the concepts and expressions in this Informative Text will express the meaning ascribed to them in PDPL and other legislation.

In the event of inconsistency between the KVKK and other relevant legislative provisions and this Informative Text, the KVKK and other relevant legislative provisions will be applied first. Our company takes the necessary technical and administrative measures to ensure the security of personal data. This text can be changed if deemed necessary according to the current legislation and the practices of our Company. You can access the final version of the text from our website [www.logsign.com](http://www.logsign.com) ("Website").

### **1. THE CONDITIONS OF PROCESSING PERSONAL DATA**

All personal data processed by the company are processed in accordance with PDPL and related legislation. In accordance with Article 4 of PDPL, the basic principles to be applied in the processing of your personal data are listed.

The personal data are processed by company; with the purchasing of products and / or services, when offering products or services to the company or contacting by any means, requesting or choosing to receive commercial electronic messages the company send for marketing; when applied for a job or start working at the company, attending events organized by the company and visiting [www.logsign.com](http://www.logsign.com) in accordance with the rules determined in this Informative Text and / or its annexes.

The Company complies with the rules stated in the scope of PDPL and the following basic principles:

- Processing in accordance with the law and honesty rule.
- Ensuring that personal data are accurate and up to date when necessary.
- Operation for specific, clear and legitimate purposes.
- Being connected, limited and restrained for the purpose for which they are processed.
- Storage for the period required by the relevant legislation or for the purpose for which they are processed.

Within the scope of the services it provides, the company processes some commercial, legal and / or personal data regarding its customers, potential customers, suppliers, business partners and their employees and officials, visitors, employees, ex-employees and employee candidates, as well as third parties whose personal data are processed in accordance with their business processes. This data will be protected as the same care that the company apply to its own data, even if the company does not specified as a trade secret in accordance with a contract or the applicable legislation, unless it is required by the company to share with third parties within the scope of the service provided under the contractual relationship, unless otherwise specified in the applicable legislation.

The e-mail addresses, names and surnames, Turkish ID no, identification information, addresses or phone numbers of customers, potential customers, suppliers, business partners and their employees and officials, visitors, employees, ex-employees and employee candidates as well as third parties whose personal data are processed in accordance with their business processes, can be processed by the company. In addition, via the website, your IP address, the start and end information about your use, the type and scope of your use, and the type of your browser and operating system are also recorded.

In addition to these, if you upload your name and surname, title, phone number, e-mail address, personal messages and similar information to the website through forms available at various locations on the website, and thus share this information with the company, we process this information you provide in accordance with your request and for the purposes of the services offered by the company.

Our website uses Google Analytics, an analysis service of Google Inc. ("Google"). On the other hand, Google Analytics uses "cookies", that is, text files that are saved on your computer and enable the use of the website to be analyzed. The information generated by cookies about the use of the website is transmitted to and stored on a Google server in the USA. Upon the instruction of the operator of this website, Google uses this information to prepare reports to evaluate your use and to provide related services. The IP address transmitted from your browser within the framework of Google Analytics is not combined with other data of Google. If you do not want these cookies to be stored, you can make settings accordingly in your browser. In addition, our website uses AdWords and double-click-Cookies for statistical purposes. If you do not want these tools to be used, you can disable them by setting them in your browser. However, we would like to state that in this case, you may not be able to use all the functions on the website completely.

We use third-party cookies and our own cookies to show you personalized ads on websites. This is called "retargeting" and aims to base your clicks on the pages you browse on our website, the products you display, and the advertising space shown to you. We also use cookies as part of our online marketing campaigns to see how users interact with our website after online ads are shown, including those on third-party websites. You can delete these cookies from your browser at any time.

Special c personal data is not processed by the company without the informed explicit consent of the relevant person. The personal data processed may differ in relation to the products and / or services offered by the company. Personal data collected orally, in writing or electronically via online or offline means, during the period of use of the products and services offered by the company, are processed with the consent of the person's before the effective date of Personal Data Protection Law no. 6698 or explicit consent after the effective date of the law, or within the framework of the rules and conditions specified in the Personal Data Protection Law.

## **BASIC PRINCIPLES FOR PROCESSING OF THE PERSONAL DATA**

Personal data is processed on condition that it is required to obtain open consent in accordance with the applicable legislation or without explicit consent, unless explicit consent is required under the applicable legislation, in line with the objectives of the services provided by the company, in order the company to continue its activities, to provide better service, to measure and improve the quality of its service, to determine the preferences and needs of our dealers, suppliers, customers and employees, to process and evaluate job applications, to provide communication with people who have a business relationship with our company, to comply with the current legislation, to send bulletins by e-mail and to make notifications.

The personal data will only be collected within the scope of the company activities, will be used in connection with the purposes of collection, will be stored for the periods required by the processing purposes, will not be processed in excess of the rules and exceptions specified in the current legislation, and in cases where the reasons requiring its processing disappear, with the exception of situations arising from other legislation in force, will be deleted, destroyed or anonymized.

Keeping the personal data accurate and up-to-date is one of our primary goals. For this reason, our Company meets the technical and administrative requirements required to keep personal data accurate and up-to-date.

Only authorized persons can access personal data and unauthorized persons working in our Company and / or having a contractual relationship with our Company are prohibited from accessing personal data. In this context, we would like to state that; Our company takes the necessary measures to ensure the security and confidentiality of personal data.

## **TRANSFER OF THE PERSONAL DATA**

## **Transfer of the Personal Data Domestically**

The company is under the responsibility of acting in accordance with primarily art. 8 of PDPL and the decisions and related regulations envisaged in the PDPL and taken by the Board. As a rule, personal data and special categories of data cannot be transferred to other real persons or legal entities by the company without the explicit consent of the relevant person.

However, in cases foreseen in Articles 5 and 6 of PDPL, transfer is possible without the explicit consent of the relevant person. The company, in accordance with the conditions stipulated in PDPL and other relevant legislation and by taking the security measures specified in the legislation; can transfer the personal data to third parties unless otherwise arranged in law or other relevant legislation in Turkey.

## **Transfer of the Personal Data Abroad**

The company can transfer the personal data abroad by processing the personal data in Turkey or to be processed and stored outside of Turkey, in accordance with the conditions foreseen in PDPL and by taking security measures specified in the legislation.

## **Rights of the Relevant Person**

Regarding the processing of personal data, according to the definition specified in the legislation, the data controller is İnnotim Yazılım Telekomünikasyon Danışmanlık LLC.

In accordance with Article 11 of PDPL, the relevant persons have the right of, by applying to the company; learning whether your personal data is processed, requesting information if it is processed, requesting the purpose of processing your personal data and whether it is used in accordance with its purpose, knowing the third party people that the person data is transferred, requesting correction of personal data if it is incomplete or incorrectly processed, requesting the deletion or removal of your personal data, requesting a notification for the third parties to whom their personal data are transferred about the deletion or removal process, objecting to the emergence of a result against you by analyzing your processed personal data exclusively with automated systems, and requesting the compensation of your loss if you are harmed due to illegal processing of personal data.

To use these specified rights arising from the current legislation, you need make a written application to address of the company given below or fill in the Application Form with the registered electronic mail (REM) address, secure electronic signature or mobile signature by adding the following information and documents according to Article 13 of PDPL; Your name and your last name and the signature, if you are a citizen of the Republic of Turkey, your Turkish ID number, if you are not a citizen of Republic of Turkey, your nationality, passport number, if you have, your ID number, your location, or workplace address that is set for notifications, main e-mail address and telephone number that are set for notifications and your demand issues, and

other necessary information and documents to be used for identification. The application made by you or representative authorized person will be evaluated by our Company and concluded free of charge within thirty days.

Application methods and addresses are as follows:

1. The applicant, him/herself or by a Proxy who is authorized to represent, can apply by mail through notary or certified mail.

Icerenkoy Mah. Erkut Sok. Uner Plaza B Blok No 4 Atasehir, Istanbul, Turkey

2. The applicant can apply with an electronic mail registered with a secure electronic signature.

Please email to: [innotim@hs03.kep.tr](mailto:innotim@hs03.kep.tr)