

PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA FOR CUSTOMERS IN ACCORDANCE WITH GDPR

This Privacy Policy describes which personal data we collect from you, why we collect this data and how your data can be updated, managed, exported and deleted.

Under the new legislation of the European Union, this information document was prepared in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing the Directive 95/46 / EC (GDPR).

1. Who is the Administrator?

The Administrator is a person who, alone or together with others, determines the purposes and decides how personal data will be processed.

The personal data Administrator is Veri Kurtarma Hizmetleri Tic. A.Ş. identification number (ISO) 0991:2015, company registered in Küçükbakkalköy Mah. Işıklar Cad. No:17 Ataşehir 34750 İstanbul, Turkey or queries and requests related to your personal data, please contact the Administrator at iletisim@verikurtarma.com.

2. What are the Legal Reasons for Processing Personal Data?

Personal data is processed by the Administrator to protect its legitimate interests. The legitimate interests of the Administrator are, in particular, the proper fulfillment of all the contractual obligations of the Administrator, the proper fulfillment of all statutory duties of the Administrator, direct marketing, the protection of the management of the business and property, and, last but not least, the protection of the environment and ensuring sustainable development.

The legal reasons for processing your personal data are given below:

- a. Ensure the conclusion and subsequent fulfillment of a contractual obligation between the Administrator and you (Article 6, paragraph 1, letter b) of the GDPR). Other legal obligations arise from such a relationship, and the administrator must process data for this purpose (Article 6, paragraph 1, letter c) of the GDPR);
- b. Create and maintain a customer database, for the purpose of registration, email correspondence and direct marketing, on the basis of a legitimate interest in the protection of the manager's business (point 47 of the GDPR);

The provision of personal information to the Administrator is generally a legal and contractual requirement. Personal data are needed for creation and maintenance of a database of customers, which is based on legitimate interests of the Administrator (point 47 of the GDPR). By virtue of this title, the customer has the opportunity to exercise his right of objection at any time processing of personal data for this purpose (Article 21, paragraph 1 of the GDPR).

3. What are the Purposes of Processing Personal Data?

Your personal data is processed based on the legal reasons listed above for the purposes of purchasing products and services, establishing and performing the contract, carrying out support services following the purchase of products and services, carrying out financial and

accounting transactions, receiving your requests and complaints, ensuring customer satisfaction, providing information in case of legal disputes or upon request of authorized institutions and organizations.

4. What are the methods of obtaining your personal data?

Your personal data was obtained by the following methods:

- Directly from you as a data subject (based on the completed questionnaires, communication, email, phone calls, concluded contracts, business cards, websites, etc.)
- By the Sales Representative
- From publicly accessible registers, lists and records (e.g. business register, trade register, cadastre of real estate, etc.)

5. What categories of personal data are processed?

To provide the company's services (technical support, professional EMS services, custom production and _____), the Administrator processes the following categories of personal data:

Basic Identity Information

This is common information that identifies your person such as name and surname, title, date of birth, permanent address, ID, VAT number. These data are necessary for the Administrator to be able to conclude a contract with you, the customer, and fulfill a contractual relationship. Typically, this is the fulfillment of the obligation to keep evidence of accounting, performance rights of liability for defects, fulfillment of tax obligations, etc.

Contact information

Contact details include the postal address, telephone or e-mail that your Administrator needs to be able to communicate with you.

Transaction and Financial Information

This includes information about your card, including your personal account number, payment card number, CVV, and information about your transactions, including date, time, location and transaction amount, and information about the merchant, billing data following the provision of the product or service.

Customer Transaction Information

Call center records include order information, request/complaint information, order history, invoice information.

6. What is the legal basis for the processing of personal data?

The lawfulness of processing is governed by Article 6, paragraph 1 of the GDPR, according to which processing is lawful, if it is necessary for the fulfillment of the contract, to fulfill the statutory duty of the Administrator, for the protection of legitimate interests of the Administrator or processing is based on the consent you have granted.

7. Will we transfer personal data to someone else?

Personal information can be provided by the Administrator, within legal limits, to state administration authorities, for example, tax Administrators. Your personal information must

also be passed on to sales representatives, within legal limits: only the basic identification data (name, surname) and contact details (working email, phone, job position) for contact purposes. Personal data will be passed on as a part of the performance of the contractual or statutory obligations of an external (i) accounting firm, (ii) tax advisor, (iii) auditor, (iv) law firm, v) server, web, cloud, IT, and other service providers, vi) carriers, (vii) or to persons who are the business partners of the Administrator involved into the performance of the contractual obligations only and exclusively to the extent strictly necessary.

Personal data will not be passed on by the Administrator for any purpose other than compliance with the legal obligation of the Administrator within legal limits.

8. Will we transfer personal data to third countries or international organizations?

We will not transfer personal data to countries outside Turkey, or to any international organization.

An exception is the following contact details: name, surname, working email address, working phone, job positions, which may be as contact details of the company's manager (legal person) are passed as part of a contract (works contracts, purchase contracts, etc.) to a third country customer. In this case, these contact details will be provided only for the purpose of conducting mutual communication between the company and the customer in order to fulfill the contractual obligations and responsibilities.

9. How long will we store personal data?

Personal data will be processed and stored for at least the duration of the contract. Some personal information necessary for the fulfillment of the legal obligation will be retained longer, in length and according to the rules determined by law. Personal data processed for the purpose of creating and maintaining a customer database, based on an authorized person of interest, will be retained for the duration of the performance of the business activity of the customer suitable for the purpose of direct marketing purposes of the administrator.

Personal data will never be stored longer than the maximum set by law. After the archiving time has elapsed, personal data will be safely and irrecoverably destroyed so that it can not be misused.

10. What are your rights related to the processing of personal data and how can you apply them?

The Administrator ensures that your data is processed properly and securely. Your rights that you can apply to the administrator regarding the processing of your personal data and the ways you can request these rights are stated below.

How can you claim your rights? You can claim your individual rights:

- By sending an e-mail to iletisim@verikurtarma.com.
- In the form of a written request sent to our postal address Veri Kurtarma Hizmetleri Tic. A.Ş. Küçükbakkalköy Mah. Işıklar Cad. No:17 Ataşehir 34750 İstanbul, Turkey.
- Personally at Veri Kurtarma Hizmetleri Tic. A.Ş. Küçükbakkalköy Mah. Işıklar Cad. No:17 Ataşehir 34750 İstanbul, Turkey.

The Administrator provides all communications and statements to your rights free of charge. However, if the application is manifestly unreasonable or disproportionate, in particular, because it is repeated, the Administrator is entitled to charge a reasonable fee, taking into

account the administrative costs associated with the provision of the required information. In the case of a repeated application for the provision of copies of the processed personal data, the Administrator reserves the right to charge a reasonable administrative fee for this reason. Expression and, if applicable, information on the measures taken will be provided to you by the Administrator as soon as possible, but not later than one month. The time limit may be extended by two months, if necessary and in view of the complexity and the number of applications. The Administrator will inform you about the extension, including reasons.

The right to be informed about the processing of your personal data

You are authorized by the Administrator to request information about whether personal data is processed or not. If personal data is processed, you have the right to request from the Administrator, in particular, the identity and contact details of the Administrator, its representative and processing purposes, categories of personal data concerned, recipients or categories of recipients of personal data, authorized Administrators, enumeration of your rights, the possibility to contact the competent authorities, the source of processed personal data and profiling. If the Administrator wishes to further process your personal data for a purpose other than that for which the personal data have been collected, it will provide you with information about this other purpose and other relevant information before such further processing. The information provided to you under this right is contained in this document, but that does not prevent you from asking again.

The right of access to personal data

You are authorized by the Administrator to request information about whether your personal data is being processed or not, and if so, you have access to information on the processing purposes, categories of the affected person data, recipients or categories of recipients, the time of storing personal information, information about your rights (rights to request from Administrator correction or deletion, limitation of processing, objection against processing), the right to file a complaint to the competent authorities, information on the source of the personal information, information on whether profiling is taking place, and information on the procedure followed and the significance and implications of such processing for you, information and guarantees in the case of transfer of personal data to third countries or international organisations. You have the right to provide copies of the processed personal data. Right to get this copy, however, must not adversely affect the rights and freedoms of others.

Right to correct your personal data

If there has been a change in your place of residence, telephone number, or other facts, for example, on your side can be considered personal, you have the right to request from the Administrator the correction of the processed personal data. In addition, you have the right to complete your personal information, including the provision of an additional statement.

Right to be forgotten

In certain specified cases, you have the right to require the Administrator to delete your personal information. Such cases include, for example, that the data processed is no longer needed for the above-mentioned purposes. The Administrator will automatically delete your personal information after the need expires, but you can do the same by sending a request at any time. Your request is then subject to individual judgement (despite your right of deletion, there may be an obligation on the Administrator or legitimate interest to keep your personal information), and you will be informed of your processing in detail.

Right to limit processing

The Administrator processes your personal information only to the extent necessary. However, if you feel that the Administrator, for example, exceeds the above-mentioned purposes for which personal data is being processed, you may request that your personal data should be processed solely for the most legitimate reasons or that personal data should be blocked. Your request is then subject to individual judgement, and you will be informed in detail of your application.

Right to data portability

If you want the Administrator to provide your personal information to another manager, or other companies, the Administrator will pass on your personal data in the appropriate format to your designated entity unless they are prevented from doing so by any legitimate or other significant obstacles.

Right to object

If you find or believe that the Administrator is processing your personal data in violation of protecting your private and personal life or in contravention of legal regulations (provided that the personal data is processed by the Administrator on the basis of public or legitimate interest, or is processed for the purposes of direct marketing, including profiling, or for statistical purposes or for scientific or historical purposes), you can contact the Administrator and ask him / her for an explanation removing the resulting malfunction.

Right to withdraw consent

If you have consented to the processing of personal data, you have the right to revoke it at any time, either by sending an email to iletisim@verikurtarma.com. or by sending the withdrawal of consent to the Administrator's postal address: Veri Kurtarma Hizmetleri Tic. A.Ş. Küçükbakkalköy Mah. Işıklar Cad. No:17 Ataşehir 34750 İstanbul, Turkey.

11. Is personal data automatically evaluated?

This document provides the basic information we are required to provide as a personal data Administrator. If you are interested in the detailed policies for the processing of personal data, they will be handed over by our company's employees.

If you have any questions regarding the processing of your personal information, please do not hesitate to contact us at our email iletisim@verikurtarma.com. or at our postal address Veri Kurtarma Hizmetleri Tic. A.Ş. Küçükbakkalköy Mah. Işıklar Cad. No:17 Ataşehir 34750 İstanbul, Turkey.

To find out how you can exercise your rights, please see the answer to Question 10 below.

If you have any questions, do not hesitate to contact us:

Email: iletisim@verikurtarma.com

Postal Address: Veri Kurtarma Hizmetleri Tic. A.Ş. Küçükbakkalköy Mah. Işıklar Cad. No:17 Ataşehir 34750 İstanbul, Turkey.

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