

## **PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA THROUGH THE REQUEST FORM WITHIN THE SCOPE OF 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](mailto:iletisim@verikurtarma.com).

### **2. What are the Legal Grounds for Processing Personal Data?**

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

The data subject's consent to the processing of personal data for one or more specific purposes (Article 6, paragraph 1, letter a of the GDPR)

The processing is necessary for the performance of a contract to which the data subject is a party or for taking steps at the request of the data subject prior to entering into a contract (Article 6, paragraph 1, letter b, GDPR),

Processing is necessary for compliance with a legal obligation to which the controller is subject (Article 6, paragraph 1, letter c of the GDPR),

the data subject has given explicit consent to the processing of the personal data in question for one or more specified purposes; (Article 9, paragraph 2, letter a, GDPR)

### **3. What are the Purposes of Processing Personal Data?**

Your personal data is processed based on the legal reasons listed above in order to provide you with data recovery services after you fill out the data recovery request form, to provide information about products and services, to contact you through the channels you specified in the request form, to purchase products and services, to establish and execute the contract, to carry out support services after the purchase of products and services, to provide information in case of legal disputes or upon request of authorized institutions and organizations.

### **4. What are the ways of obtaining your personal data?**

Your personal data was obtained directly from you as the data owner by filling out the "Data Recovery Request Form" on the website and sending it to us as the data controller.

### **5. Which Categories of Personal Data are Processed?**

In order to provide the Company's data recovery services, the Data Controller processes the following categories of personal data:

### **Basic Identity Information**

This is general information that identifies your personality, such as name and surname, title, date of birth, permanent address, identification, VAT number. This data is necessary for the Data controller to enter into a contract with you, the customer, and to fulfill a contractual relationship. Typically, this includes the fulfillment of the obligation to keep accounting evidence, rights of performance of liabilities for defects, fulfillment of tax obligations, etc.

### **Contact details**

Contact information includes the postal address, telephone or e-mail it needs to contact you.

### **Information on the Disk**

The information contained on the disk brought to the data controller for data recovery. The information on the disk includes identity, contact, title and personal information, professional experience information, visual and audio recordings, financial information, marketing, location, customer transaction information, transaction security information, and all special categories of personal data, if any.

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

The lawfulness of processing is governed by Article 6(1) of the GDPR, according to which data processing is lawful if it is necessary for the performance of a contract, for the performance of a legal duty of the Data controller, for the protection of the legitimate interests of the Data controller or if the processing is based on the consent you have given.

## **7. Sharing Personal Data with Third Parties?**

Personal data may be provided by the Data Controller to state administrative authorities, e.g. tax administrators, within legal limits. Your personal data must also be transferred to sales representatives within legal limits: only basic identification data (first name, last name) and contact details (working e-mail, telephone, job position) for communication purposes. Personal data will be transferred to 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 business partners of the Data controller involved in the fulfillment of contractual or legal obligations, if and only to the extent strictly necessary as part of the fulfillment of their contractual or legal obligations.

Personal data will not be transferred by the Data controller for any purpose other than compliance with the legal obligation of the Data controller 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.

The exception is the following contact information: name, surname, working e-mail address, working telephone, job positions, company The contact information of the data controller (legal entity) is transmitted to a third country client as part of a contract (employment contracts, purchase contracts, etc.), In this case, this contact information will be provided only

for the purpose of conducting mutual communication between the company and the client for the fulfillment of 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](mailto: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](mailto: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](mailto: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](mailto:iletisim@verikurtarma.com)

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

**The document is valid from 23.01.2024**