

PRIVACY STATEMENT ON THE PROCESSING AND PROTECTION OF PERSONAL DATA WITHIN THE SCOPE OF KVKK - CUSTOMER

Pursuant to the Law No. 6698 on the Protection of Personal Data ("Law"), this Privacy statement explains which personal data is obtained from you within the scope of being our customer, the method of collecting your personal data, the legal reasons and purposes for processing your personal data, the parties to whom your personal data is transferred, and the rights you can exercise regarding your personal data.

1. Who is the Data Controller?

Data Controller refers to the natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.

Pursuant to the Law, your personal data may be processed by **Veri Kurtarma Hizmetleri Tic. A.Ş.** ("Veri Kurtarma" or "Company") as the data controller within the scope described below.

2. Your Processed Personal Data, Legal Reasons and Purposes

Your personal data are processed based on the legal grounds set out in Articles 5 and 6 of the Law. Your personal data processed, the legal grounds for processing your personal data and the purposes of processing your personal data are shown in the table below.

| Legal grounds | Objectives | Processed Personal Data |
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| Article 5(2)(a): Explicitly provided for by law. | <ul style="list-style-type: none">- Fulfillment of the obligations arising from the legislation to which our Company is subject, especially the Turkish Commercial Code No. 6102, the Turkish Criminal Code No. 5237 and the Law No. 6502 on Consumer Protection,- Execution of our activities in accordance with the legislation,- Fulfillment of data sharing and preservation obligations by our Company in accordance with our obligations arising from the legislation. | Identity Name-Surname, Turkish ID Number Contact Email, Phone, Address Customer Transaction: Call center records, order information, request/complaint information, order history, invoice information Transaction Security: your device information, IP address information, password and password information, cookie information, access logs, login method Risk Management: information processed to manage commercial, technical, administrative risks, Finance: Information about your card including personal account number, IBAN, payment card number, CVV, transaction amount, billing information |

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| | | Audio and Visual Recordings: Photo, Video, Audio recording |
| Article 5(2)(c): Processing of personal data of the parties to a contract is necessary, provided that it is directly related to the conclusion or performance of the contract. | <ul style="list-style-type: none"> - Communicating with the customer, - Providing information to the customer about the product and service, - Purchase of products or services, - Ensuring the performance of products or services, - Provision of support services following the purchase of products or services, - Providing information to the customer after providing a product or service, - Execution of finance and accounting transactions, | Identity Name-Surname, Turkish ID Number Contact Email, Phone, Address Customer Transaction: Call center records, order information, request/complaint information, order history, invoice information Risk Management: information processed to manage commercial, technical, administrative risks, Finance: Information about your card including personal account number, IBAN, payment card number, CVV, transaction amount, billing information Audio and Visual Recordings: Photo, Video, Audio recording |
| Article 5/2(ç): It is mandatory for the data controller to fulfill its legal obligation. Article 5/2(e): Data processing is necessary for the establishment, exercise or protection of a right. | <ul style="list-style-type: none"> - In the event of legal disputes or if authorized institutions and organizations request or require us to notify these institutions, | Identity Name-Surname, Turkish ID Number Contact Email, Phone, Address Legal Action: information in correspondence with judicial authorities, information in case files, Customer Transaction: Call center records, order information, request/complaint information, order history, invoice information Transaction Security: your device information, IP address information, password and password information, cookie information, access logs, login method Risk Management: information processed to manage commercial, technical, administrative risks, Finance: Information about your card including personal account number, IBAN, payment card number, CVV, transaction amount, billing information |

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| | | Audio and Visual Recordings: Photo, Video, Audio recording |
| Article 5/2(f): Processing is necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject. | <ul style="list-style-type: none"> - Ensuring customer satisfaction, - Communication with the customer, - Receiving, evaluating and finalizing suggestions, requests and complaints, - Contacting customers regarding suggestions, requests and complaints, | Identity Name-Surname, Turkish ID Number Contact Email, Phone, Address Customer Transaction: Call center records, order information, request/complaint information, order history, invoice information Transaction Security: your device information, IP address information, password and password information, cookie information, access logs, login method Risk Management: information processed to manage commercial, technical, administrative risks, Audio and Visual Recordings: Photo, Video, Audio recording Other Suggestions, Requests and Complaints |

3. Methods of Collecting Your Personal Data

Your aforementioned personal data is collected directly from you as the data subject through questionnaires, forms, documents or telephone calls and communications via e-mail, meetings with the sales representative or physical visits; from public registers, lists and records by automatic or partially automatic means or by non-automatic means provided that it is part of any data recording system.

4. Parties to whom Your Personal Data is Transferred

Your personal data obtained are shared with third parties in accordance with the purposes and legal reasons specified in this Privacy statement. Information on with whom and for what purposes your personal data are shared is provided below.

Your personal data is shared with third parties in accordance with Articles 8 and 9 of the Law and the rules regarding the transfer of personal data.

| Transferred Personal Data Groups | Purpose of Data Transfer | Legal Reason for Data Transfer | Transfer Groups |
|---|---|--|--|
| Identity, Contact, | <ul style="list-style-type: none"> - Execution of business processes, Ensuring Business Continuity - Obtaining product or | It is Necessary to Process Personal Data of the Parties to the Contract, | Service Providers (web, cloud and other service providers) Cookie Providers, |

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| Customer Transaction, Transaction Security, Legal action, Risk management, Finance, Visual and Audio Recordings, Other informations. | service support to fulfill contractual requirements . | Provided That It is Directly Related to the Establishment or Performance of a Contract in accordance with KVKK Art. 8/2 (a) and KVKK Art. 5/f.2 (c) , | Suppliers, Real and Legal Persons from whom we receive support (Accounting Firm, Tax Consultant, Auditor, Law Firm) Shareholders, Work partners |
| | - Proof of Legal Disputes, Fulfillment of Legal Obligations, - In cases where authorized institutions or organizations request our Company or we are expected to notify these institutions | It is mandatory for the Data Controller to fulfill its legal obligations in accordance with KVKK article 8/2 (a) and KVKK article 5/f.2 (d). | Authorized Public Institutions and Organizations, Judicial Authorities, Judicial Units |
| | - Public Relations, Carrying Out Press-Media Processes, Carrying Out Commercial Activities Carried out by the Company, Improving Visit Experiences, Carrying Out the Public Relations Process, Improving the Quality of Goods and Services, Promoting the Goods and Services Offered | Data Processing is Mandatory for the Legitimate Interests of the Data Controller, Provided That It Does Not Harm the Fundamental Rights and Freedoms of the Relevant Person, Pursuant to KVKK Article 8/2 (a) and KVKK Article 5/f.2 (f). | Suppliers, Shareholders, Real people, Private Law Legal Entities Cookie Providers |

5. Data Subject Rights

The data controller ensures that your data is processed properly and securely. Your rights to apply to the Data Controller regarding the processing of your personal data are regulated in Article 11 of the Law.

You can submit your requests within the scope of Article 11 of the Law to Data Recovery Services, which is the Data Controller, through the following channels.

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

You may also choose the methods specified in the [Communiqué on the Procedures and Principles of Application to the Data Controller](#) to exercise your rights. Depending on the nature of your request, your applications will be finalized free of charge as soon as possible and within thirty days at the latest. If the transaction requires an additional cost, you may be charged a fee according to the tariff to be determined by the Personal Data Protection Board.

This document is valid as of 24/01/2024.