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## PERSONAL DATA PROTECTION POLICY

This policy explains the principles of USERSDOT TECHNOLOGY AND CONSULTANCY INC. (hereinafter referred to as the “Usersdot” or "Company") regarding the processing of personal data that are required to be known by Personal Data Owners.

### I. DEFINITIONS

<b>Data Controller</b>	Data Controller refers to the natural or legal person who determines the purposes and means of processing personal data, and who is responsible for establishing and managing the data recording system.
<b>The Company</b>	The data controller refers to Usersdot Technology and Consultancy Inc.
<b>Data Subject/Concerned Individual</b>	The data subject is the individual whose personal data is being processed.
<b>Data Processor</b>	The natural or legal person who processes personal data on behalf of the data controller, based on the authority granted by the data controller.
<b>Personal Data</b>	It refers to any kind of information relating to an identified or identifiable natural person.
<b>Sensitive Personal Data</b>	It refers to data regarding individuals' race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, attire, association, foundation or union membership, health, sexual life, criminal record, and security measures, as well as biometric and genetic data.
<b>Processing of Personal Data</b>	It encompasses all kinds of processes carried out on data, whether fully or partially, by automatic or non-automatic means, including obtaining, recording, storing, preserving, altering, rearranging, disclosing, transferring, taking over, making data accessible, classifying, or preventing the use of data.
<b>KVKK</b>	It refers to the Law on the Protection of Personal Data No. 6698.
<b>Board</b>	It refers to the Personal Data Protection Board.
<b>Authority</b>	It refers to the Personal Data Protection Authority.
<b>Data Registry System</b>	It refers to the record system where personal data is processed in a structured manner according to specific criteria.
<b>Record System</b>	Any environment containing personal data that is processed either wholly or partly by automatic means or by non-automatic means as part of a data recording system.
<b>Electronic Environment</b>	The environments in which personal data can be created, read, modified, and written using electronic devices.
<b>Non-electronic environment</b>	It refers to all written, printed, visual, and other formats that exist outside of electronic environments.

<b>Explicit Consent</b>	It expresses consent based on information provided on a specific subject and declared with free will.
<b>Anonymization of Personal Data</b>	Anonymization of personal data refers to rendering it in a way that it can no longer be associated with an identified or identifiable individual, even when combined with other data.

## II. PURPOSE OF THE POLICY

The main purpose of this Policy is to make explanations about the systems for the processing and protection of personal data in accordance with the Personal Data Protection Law and the relevant legislation, and in this context, to inform the Personal Data Owners (Relevant Person) whose personal data are processed by the company, especially but not limited to those categorized in detail below.

In this way, it is aimed that Personal Data Owners are aware of the company policy, protect all their rights arising from the legislation regarding Personal Data and use them effectively.

## III. ISSUES RELATED TO THE PROTECTION OF PERSONAL DATA

### 1. Ensuring the Security of Personal Data

In accordance with Article 12 of the Law, our company takes the necessary measures according to the nature of the data to be protected in order to prevent the unlawful disclosure, access, transfer of personal data or security deficiencies that may occur in other ways. In this context, our Company takes administrative measures to ensure the necessary level of security in accordance with the guidelines published by the Personal Data Protection Board ("Board"), conducts or has audits carried out.

### 2. Protection of Sensitive Personal Data

With the law, special importance has been attached to some personal data due to the risk of causing victimization or discrimination when processed unlawfully. These data; race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, disguise and dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data. Special measures are taken and sensitive are taken by the Company in the protection of sensitive personal data processed in accordance with the law, which is determined as "special quality" by the Law and is considered sensitive without being limited to this. In this context, the technical and administrative measures taken by the Company for the protection of personal data are carefully implemented in terms of sensitive personal data and necessary audits are provided.

### 3. Work Units of Personal Data Protection and Processing Raising Awareness and Supervision

The data controller ensures that the necessary trainings are organized for the business units in order to raise

awareness to prevent the unlawful processing of personal data, unlawful access to personal data and to ensure the protection of personal data. Necessary systems are established to raise awareness of company employees on the protection of personal data, and work with consultants if needed. Accordingly, our Company evaluates the participation in relevant trainings, seminars and information sessions and updates and renews its trainings in parallel with the update of the relevant legislation.

#### **IV. BASIC PRINCIPLES IN THE PROCESSING OF PERSONAL DATA**

The following basic principles are adopted by the Company within the scope of ensuring and maintaining compliance with the legislation on the protection of personal data:

##### **(1) Processing personal data in accordance with the law and good faith**

The Company carries out personal data processing activities in accordance with the law and the rule of good faith, in accordance with the legislation on the protection of personal data, especially the Constitution of the Republic of Turkey.

##### **(2) Ensuring the accuracy and up-to-dateness of the processed personal data**

While the processing of personal data is carried out by the Company, all necessary administrative and technical measures are taken to ensure the accuracy and up-to-dateness of personal data within the scope of technical possibilities.

In this context, our company has established mechanisms to correct and verify the accuracy of personal data owners in case their personal data is incorrect.

##### **(3) Processing of personal data for specific, explicit and legitimate purposes**

The processing of personal data by the Company is carried out within the scope of clear and lawful purposes determined before the personal data processing activity begins.

##### **(4) Processing personal data in a purpose-related, limited and measured manner**

Personal data is processed by the Company in connection with the data processing conditions and to the extent necessary for the performance of these services. In this context, the purpose of personal data processing is determined before the personal data processing activity is started, and data processing activities are not carried out with the assumption that it can be used in the future.

##### **(5) To keep personal data for the period stipulated in the relevant legislation or required for the purpose for which they are processed**

The Company retains personal data for the period stipulated in the relevant legislation or required by the purpose of data processing. Accordingly, personal data is deleted, destroyed or anonymized by the company in the event of the expiry of the period stipulated in the legislation, the request of the personal data owner or the disappearance of the reasons requiring the processing of personal data.

## V. CONDITIONS FOR PROCESSING PERSONAL DATA

Except for the explicit consent of the personal data owner, the basis of the personal data processing activity may be only one of the conditions stated below, or more than one condition may be the basis of the same personal data processing activity.

### **(1) Obtaining the Explicit Consent of the Personal Data Owner**

One of the conditions for processing personal data is the explicit consent of the data owner. The explicit consent of the personal data owner should be disclosed on a specific subject, based on information and with free will.

In the presence of the following personal data processing conditions, personal data may be processed without the need for the explicit consent of the data owner.

### **(2) Clearly Stipulated in the Laws**

If the personal data of the data owner is clearly stipulated in the law, in other words, if there is a clear provision regarding the processing of personal data in the relevant law, the existence of this data processing condition may be mentioned.

### **(3) Failure to Obtain the Explicit Consent of the Person Concerned Due to Actual Impossibility**

The personal data of the data owner may be processed if it is necessary to process the personal data of the person who is unable to disclose his consent due to actual impossibility or whose consent cannot be validated in order to protect the life or physical integrity of himself or another person.

### **(4) Being Directly Related to the Establishment or Performance of the Contract**

Provided that it is directly related to the establishment or performance of a contract to which the data owner is a party, this condition may be deemed to be fulfilled if it is necessary to process personal data.

### **(5) Fulfillment of the Company's Legal Obligation**

If the processing is mandatory for our company to fulfill its legal obligations, the personal data of the data owner may be processed.

### **(6) Publicization of Personal Data by the Personal Data Owner**

If the data owner has made his/her personal data public, the relevant personal data may be processed limited to the purpose of making it public

### **(7) Data Processing is Mandatory for the Establishment or Protection of a Right**

If data processing is mandatory for the establishment, exercise or protection of a right, the personal



data of the data owner may be processed.

**(8) Data Processing is Mandatory for the Legitimate Interest of the Data Controller, Provided That It Does Not Harm the Fundamental Rights and Freedoms of the Data Subject**

Provided that it does not harm the fundamental rights and freedoms of the personal data owner, the personal data of the data owner may be processed if it is necessary to process data for the legitimate interests of our Company.

**VI. IDENTIFICATION OF DATA SUBJECTS**

<b>Group of Data Subjects</b>	<b>Identification</b>
Shareholders and Partners	Real persons who are shareholders/partners of the company
Employees	Individuals employed by the company as insured persons
Employee Candidates	Individuals who apply to work for the company electronically and/or physically
Potential Real Person Customer/ Potential Costumer’s Employees and Authorized Persons	Real persons, legal persons or employees and/or officials of real persons who have requested to use the Company's products and/or services electronically or physically, or who have been determined to make a request in accordance with commercial practices and honesty rules,
Real Person Customer/ Costumer’s Employees and Authorized Persons	Real persons, employees and/or authorized persons of real or legal persons who use or have used the products and/or services offered by the Company
Potential Business Partners Shareholder/ Employee/ Authorized Person	All real persons, including shareholders, authorized persons, and employees of real and/or legal persons with whom the company plans to establish any kind of business or service relationship (bank, partnership, supplier, contractor, etc.)
Business Partners Shareholder/ Employee/ Authorized Person	All real persons involved in any kind of business or service relationship in which the company is engaged (bank, partnership, supplier, contractor, etc.), including shareholders, authorized persons, and employees of legal entities.
Third Party Visitors	Real persons who access the www.usersdot.com website or mobile applications for various purposes <a href="#">that are not included in other categories</a> in which the company processes their data (Website Visitor)

## VII. CATEGORIZATION OF PERSONAL DATA

Group of Data Subjects	Categorization of Personal Data
Shareholders and Partners	Identity Data, Communication Data, Financial Data, Legal Transaction Data, Visual and Auditory Data
Employees	Identity Data, Communication Data, Personal Data, Financial Data, Visual and Auditory Data, Health Data, Appearance Data, Criminal and Security Measures Data
Employee Candidates	Identity Data, Communication Data, Professional Experience Data, Visual and Auditory Data
Potential Real Person Customer/ Potential Customer's Employees and Authorized Persons	Identity Data, Communication Data, Other (Request/Complaint Data)
Real Person Customer/ Customer's Employees and Authorized Persons	Identity Data, Communication Data, Financial Data, Customer Transaction Data, Transaction Security Data, Other (Request/Complaint Data)
Potential Business Partners Shareholder/ Employee/ Authorized Person	Identity Data, Communication Data
Business Partners Shareholder/ Employee/ Authorized Person	Identity Data, Communication Data, Other (Request/Complaint Data)
Third Party Visitors	Transaction Security Data

## VIII. ACQUISITION AND PROCESSING OF PERSONAL DATA

### 1. Processing Purposes and Legal Basis for the Processing of Employee Personal Data

Processed Personal Data	Processing Purposes of Personal Data
<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Employment Data</li> <li>• Financial Data</li> <li>• Visual and Auditory Data</li> <li>• Health Data</li> <li>• Appearance Data</li> </ul>	<p>Detailed information about the personal data of employees is published within the Company in a manner accessible only to our employees, and they have been duly informed about this matter.</p> <p>You can submit your requests regarding the processed personal data and exercise your rights by using one of the</p>



<ul style="list-style-type: none"> <li>• Criminal and Security Measures Data</li> </ul>	<p>application methods specified in this Policy and also detailed in the Information Texts.</p> <p>You can access and download the Relevant Person Request Form from the Personal Data Protection section on <a href="http://www.usersdot.com">www.usersdot.com</a>.</p>
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## 2. Processing Purposes and Legal Basis for the Processing of Shareholders and Partners Personal Data

Processed Personal Data	Processing Purposes of Personal Data
<ul style="list-style-type: none"> <li>• Identity Data <i>Name, Surname, Turkish Republic Identification Number, Date of Birth, Place of Birth, Gender, Serial Number, Mother's Name, Father's Name, Signature, Marital Status, Nationality, Title</i></li> <li>• Contact Data <i>Registered Address Information, Email Address, Phone Number</i></li> <li>• Financial Data <i>Share Ratio, Share Group, Bank Name, Branch Name, Account Number, IBAN Number</i></li> <li>• Visual and Auditory Data <i>Photographs/Videos/Writings</i></li> <li>• Legal Transaction Data <i>Contract Date, Transfer Date</i></li> </ul>	<ul style="list-style-type: none"> <li>• Conducting Financial and Accounting Affairs</li> <li>• Conducting/Supervising Business Activities</li> <li>• Conducting Contract Processes</li> <li>• Conducting Communication Activities</li> <li>• Executing Investment Processes</li> <li>• Conducting Management Activities</li> <li>• Conducting Activities in Compliance with Legislation</li> <li>• Monitoring and Conducting Legal Affairs</li> <li>• Conducting Company Advertising/Promotional Processes</li> <li>• Executing Information Security Processes</li> <li>• Tracking Requests/Complaints</li> </ul> <hr/> <p><b>Legal Basis of Compliance</b></p> <ul style="list-style-type: none"> <li>• Fulfillment of the Company's Legal Obligation</li> <li>• Being Directly Related to the Establishment or Performa Performance of the Contract</li> <li>• Being Mandatory for the Legitimate Interests of the Data Controller Provided That It Does Not Harm the Fundamental Rights and Freedoms of the Data Subject</li> </ul>

### 3. Processing Purposes and Legal Basis for the Processing of Employee Candidates Personal Data

Processed Personal Data	Processing Purposes of Personal Data
<ul style="list-style-type: none"> <li>• Identity Data: <i>Name, Surname, Date of Birth, Place of Birth, Gender, Marital Status, Title, Driver's License Information</i></li> <li>• Contact Data <i>Address Information, Email Address, Phone Number</i></li> <li>• Professional Experience Data <i>Educational Information (Degree Details / University Name), Past Employment Experience, Reference Information from Previous Employers, Role Assessed during Hiring Process, Resume Details, Certificate/Course Information, Last Employer/Current Company, Foreign Language Proficiency, Knowledge of Software and Computer Programs.</i></li> <li>• Visual and Audio Data <i>Photographs</i></li> </ul>	<ul style="list-style-type: none"> <li>• Conducting Applicant Recruitment Processes</li> <li>• Determining Human Resources Processes</li> <li>• Execution of Communication Activities</li> <li>• Execution of Information Security Processes</li> <li>• Monitoring and Execution of Legal Affairs</li> <li>• Tracking Requests/Complaints</li> </ul>
	<p style="text-align: center;"><b>Legal Basis of Compliance</b></p> <ul style="list-style-type: none"> <li>• Being Mandatory for the Legitimate Interests of the Data Controller Provided That It Does Not Harm the Fundamental Rights and Freedoms of the Data Subject</li> </ul>

### 4. The Purposes and Legal Basis for Processing Personal Data of Potential Real Person Customer/ Costumer's Employee and Authorized Person

Processed Personal Data	Processing Purposes of Personal Data
<ul style="list-style-type: none"> <li>• Identity Data <i>Name, Signature, Signature Circles, Surname, Turkish Republic ID Number/ Tax ID, Tax Office, Workplace Name, Title</i></li> <li>• Contact Data</li> </ul>	<ul style="list-style-type: none"> <li>• Execution of Goods/Service Sales Processes</li> <li>• Execution of Product/Service Marketing Processes</li> <li>• Execution of Communication Activities</li> <li>• Execution of Information Security Processes</li> <li>• Monitoring and Execution of Legal Affairs</li> <li>• Tracking of Requests/Complaints</li> </ul>

<p><i>Address, Email Address, Phone Number, Fax Number</i></p> <ul style="list-style-type: none"> <li>• Other Data</li> </ul> <p><i>Request/Complaint Information</i></p>	<p><b>Legal Basis of Compliance</b></p>
	<ul style="list-style-type: none"> <li>• Being Directly Related to the Establishment or Performance of the Contract</li> <li>• Being Mandatory for the Legitimate Interests of the Data Controller Provided That It Does Not Harm the Fundamental Rights and Freedoms of the Data Subject</li> <li>• Publicization of Personal Data by the Personal Data Owner</li> </ul>

## 5. The Purposes and Legal Basis for Processing Personal Data of Real Person Customer/ Customer's Employee and Authorized Person

Processed Personal Data	Processing Purposes of Personal Data
<ul style="list-style-type: none"> <li>• Identity Data</li> </ul> <p><i>Name, Signature, Signature Circles, Surname, Workplace Name, Title</i></p> <ul style="list-style-type: none"> <li>• Communication Data</li> </ul> <p><i>Address Information, Email Address, Phone Number</i></p> <ul style="list-style-type: none"> <li>• Transaction Security Data</li> </ul> <p><i>Username, Password, IP Address, Website Login-Logout Information</i></p> <ul style="list-style-type: none"> <li>• Other Data</li> </ul> <p><i>Request/Complaint Information</i></p>	<ul style="list-style-type: none"> <li>• Execution of Goods/Service Sales Processes</li> <li>• Execution of Product/Service Marketing Processes</li> <li>• Execution of After-Sales Support Services for Goods/Services</li> <li>• Execution of Communication Activities</li> <li>• Conducting Financial and Accounting Processes</li> <li>• Conducting Contract Processes</li> <li>• Monitoring and Handling Legal Affairs</li> <li>• Conducting/Supervising Business Activities</li> <li>• Ensuring Compliance of Activities with Regulations</li> <li>• Managing Customer Relationship Processes</li> <li>• Tracking Requests/Complaints</li> <li>• Executing Information Security Processes</li> </ul>
	<p><b>Legal Basis of Compliance</b></p>
	<ul style="list-style-type: none"> <li>• Being Directly Related to the Establishment or Performance of the Contract</li> <li>• Being Mandatory for the Legitimate Interests of the Data Controller Provided That It Does Not Harm the Fundamental Rights and Freedoms of the Data Subject</li> </ul>

## 6. Processing Purposes and Legal Basis for Potential Business Partners Shareholder/Employee and Authorized Person

Processed Personal Data	Processing Purposes of Personal Data
<ul style="list-style-type: none"> <li>Identity Data <i>Name, Surname, Position, Title</i></li> <li>Communication Data <i>Email Address, Phone Number</i></li> </ul>	<ul style="list-style-type: none"> <li>Execution of Communication Activities</li> <li>Execution of Purchase Processes for Goods/Services</li> <li>Executing Information Security Processes</li> <li>Follow-up and Execution of Legal Affairs</li> <li>Follow-up of Requests/Complaints</li> </ul>
	<p><b>Legal Basis of Compliance</b></p> <ul style="list-style-type: none"> <li>Being Directly Related to the Establishment or Performance of the Contract</li> <li>Data Processing is Mandatory for the Legitimate Interest of the Data Controller, Provided That It Does Not Harm the Fundamental Rights and Freedoms of the Data Subject</li> </ul>

## 7. Purposes and Legal Basis for Processing Personal Data of Business Partners' Shareholders/Employees/Representatives

Processed Personal Data	Processing Purposes of Personal Data
<ul style="list-style-type: none"> <li>Identity Data <i>Name, Signature, Signature Circulations, Surname, TCKN (Turkish ID Number), Position, Title</i></li> <li>Contact Data <i>Address, Company Address Details, Email Address, Phone Number</i></li> <li>Transaction Security Data <i>Username, Password, IP Address, Website Entry-Exit Records</i></li> </ul>	<ul style="list-style-type: none"> <li>Follow-up and Execution of Legal Affairs</li> <li>Follow-up of Requests/Complaints</li> <li>Execution of Purchase of Goods/Services</li> <li>Execution of Information Security Processes</li> <li>Execution of Contract Processes</li> <li>Execution of Product/Service Marketing Processes</li> <li>Execution/Supervision of Business Activities</li> <li>Compliance of Activities with Legislation</li> <li>Execution of Financial and Accounting Processes</li> <li>Monitoring and Execution of Legal Affairs</li> <li>Execution of Communication Activities</li> </ul>
	<p><b>Legal Basis of Compliance</b></p>

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	<ul style="list-style-type: none"> <li>• Being Directly Related to the Establishment or Performance of the Contract</li> <li>• Data Processing is Mandatory for the Legitimate Interest of the Data Controller, Provided That It Does Not Harm the Fundamental Rights and Freedoms of the Data Subject</li> <li>• Fulfillment of the Company's Legal Obligation</li> </ul>
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## 8. Processing Purposes and Legal Basis for Personal Data of Third-Party Visitors

Processed Personal Data	Processing Purposes of Personal Data
<ul style="list-style-type: none"> <li>• Transaction Security Data</li> </ul> <p><i>Username, Password, IP Address, Website Entry-Exit Records</i></p>	<ul style="list-style-type: none"> <li>• Conducting and Supervising Business Activities</li> <li>• Ensuring Compliance of Activities with Regulations</li> <li>• Executing Information Security Processes</li> <li>• Follow-up and Execution of Legal Affairs</li> <li>• Follow-up of Requests/Complaints</li> </ul>
	Legal Basis of Compliance
	<ul style="list-style-type: none"> <li>• Data Processing is Mandatory for the Legitimate Interest of the Data Controller, Provided That It Does Not Harm the Fundamental Rights and Freedoms of the Data Subject</li> </ul>

## IX. ACQUISITION AND PROCESSING OF SENSITIVE PERSONAL DATA

The data controller company processes special categories of personal data belonging to company shareholders, officials, and employees. Detailed information about these personal data is published within the company in a manner accessible only to the relevant individuals, who have been duly informed about this matter.

Individuals whose special categories of personal data are processed may, if they wish, submit their requests regarding the processed personal data and exercise their rights using one of the application methods specified in Article XII of this Policy.

## X. TRANSFER OF PERSONAL DATA

All your personal data that you have shared with us are kept confidential in the database of the company and in physical documents in accordance with Article 12 of the Law on the Protection of Personal Data No. 6698.

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Personal data processed for existing purposes, in accordance with Articles 8 and 9 of the Law, by specifying the purposes of transfer in detail in the Clarification Texts (real persons and private law legal entities within the scope of the relevant legislation (3. Person Private Institutions) and authorized public institutions and organizations (SGK, İŞ-KUR, Banks within the Banks Association of Turkey, Court of Accounts, Ministry of Finance, Central Bank, etc.).

Some data related to shareholders/partners and employees are directly related to the establishment or performance of a contract within the scope of the purposes of conducting investment processes, conducting management activities, conducting company advertising/promotion processes, provided that 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 person concerned, and stipulated in the fourth paragraph of Article 9 of the Law on the Protection of Personal Data. provided that appropriate assurances are provided and transferred to Investors or Potential Investors abroad.

Some data regarding employees are transferred to Social Network Providers abroad for the purposes of conducting employee satisfaction and loyalty processes, conducting performance evaluation processes, and conducting company advertising/promotion processes, provided that the appropriate safeguards stipulated in the fourth paragraph of Article 9 of the Personal Data Protection Law are provided.

Some of the general data regarding the data subjects are categorized in detail in the Clarification Texts and transferred to Cloud Service Providers abroad for the purposes specified, provided that the appropriate safeguards stipulated in the fourth paragraph of Article 9 of the Personal Data Protection Law, which were adopted after the amendment, are provided.

## **XI. SECURITY OF PERSONAL DATA**

The Company takes the following measures as a minimum in order to ensure the security of the personal data it processes, to prevent unlawful access and to prevent unlawful data processing.

### **Technical Measures:**

- Network security and application security are ensured.
- Closed system networks are used for transferring personal data over the network
- Key management is implemented.
- Security measures are taken in the procurement, development, and maintenance of information technology systems.
- Security of personal data stored in the cloud is ensured.
- An authorization matrix is created for employees.
- Access logs are regularly maintained.
- Corporate policies on access, information security, usage, storage, and disposal have been developed and implemented.
- Data masking measures are implemented when necessary.
- Current anti-virus systems are utilized.
- Firewalls are employed.

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- Signed contracts include data security provisions.
- Personal data is backed up, and the security of backed-up personal data is ensured.
- Log records are maintained in a manner that prevents user intervention.
- Secure encryption/cryptographic keys are used for sensitive personal data and managed by different units.
- Intrusion detection and prevention systems are used.
- Penetration testing is conducted.
- Cybersecurity measures are implemented and continuously monitored for compliance.
- Encryption is applied.
- Data loss prevention software is used.

## **Administrative Measures:**

- Discipline regulations containing data security provisions are in place for employees.
- Regular training and awareness programs on data security are conducted for employees.
- Privacy commitments are made.
- The permissions of employees undergoing role changes or leaving the company in this field are revoked.
- Policies and procedures for personal data security are established.
- Personal data security issues are promptly reported.
- Monitoring of personal data security is conducted.
- Necessary security measures are taken for access to physical environments containing personal data.
- Security against external risks (fire, flood, etc.) is ensured for physical environments containing personal data.
- Security of environments containing personal data is maintained.
- Personal data is minimized whenever possible.
- Internal periodic and/or random audits are conducted.
- Existing risks and threats are identified.
- Protocols and procedures for the security of special category personal data are established and implemented.
- Data processing service providers undergo regular audits regarding data security.
- Data processing service providers are made aware of data security practices.

## **XII. RIGHTS AND EXERCISE OF PERSONAL DATA OWNERS ON THEIR PERSONAL DATA**

Pursuant to Article 11 of Law No. 6698, your rights over your personal data that you have shared with us within the scope of the purposes specified in this Personal Data Protection Policy and the methods of processing personal data are as follows: Pursuant to Article 11 of the Law, data owners have the following rights:

- To learn whether personal data is being processed,
- To request information if personal data has been processed,

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- To learn the purpose of processing personal data and whether they are used for their intended purpose,
- To know the third parties to whom personal data is transferred domestically or abroad,
- To request correction of personal data if it is incomplete or inaccurate and to request notification of the correction to third parties to whom the personal data has been transferred,
- To request the deletion or destruction of personal data in accordance with the Law No. 6698 and other relevant legislation, despite being processed in compliance with the law, if the reasons requiring processing have ceased, and to request notification of this process to third parties to whom the personal data has been transferred,
- To object to a decision made against them based solely on automated processing of data,
- To demand compensation for damages suffered due to unlawful processing of personal data.

Your requests regarding these rights will be evaluated and concluded within 30 (thirty) days if delivered in writing to USERSDOT TECHNOLOGY AND CONSULTING INC.'s address " *Ayazağa Mah. Kemberburgaz Cad. Vadi İstanbul Park Sitesi 7A Blok No:7B Kat:2 İç Kapı No:4 Sarıyer/İstanbul* " by hand delivery, post, or cargo, or through a notary, or via secure electronic signature and mobile signature to our electronic mail (KEP) address [usersdotteknoloji@hs01.kep.tr](mailto:usersdotteknoloji@hs01.kep.tr) or to the company's email address [kvkk@usersdot.com](mailto:kvkk@usersdot.com). Requests submitted by the data subject must include the following information: name, surname, signature if the application is in writing, TR identity number, nationality if the data subject is a foreigner, passport number or, if any, identity number, and the address of residence or workplace, email address for notification, telephone and fax numbers, and the subject of the request.

You can access and download the request form from the "Personal Data Protection" section on [www.usersdot.com](http://www.usersdot.com).

### **XIII. KEEPING PERSONAL DATA ACCURATE AND UP-TO-DATE**

The relevant groups of persons whose personal data we process have accepted and declared that they know that the accuracy and up-to-date of the personal data received due to the contractual relationship is important for them to exercise their rights on their personal data in terms of KVKK and other relevant legislation, and that the responsibility arising from providing false information will be entirely their own.

### **XIV. PERSONAL DATA RETENTION PERIOD**

Personal data regarding employees, shareholders/partners, employee candidates, real person customers, customer employees or officials, employees/officials of business partners, third party visitors are stored during the legal relationship and for 10 years from the termination of the relationship; Personal data regarding the potential real person customer/employee/official with whom no legal relationship is established, the potential legal person customer's employee/official, the employee or official of potential business partners, employee candidates, employee candidates are stored for a reasonable period of 2 years from the processing of the transaction security data for a maximum of 2 years in terms of the Internet Law No. 5651.





## **XV. DELETION, DESTRUCTION OR ANONYMIZATION OF PERSONAL DATA**

Your personal data processed for the purposes specified in this Personal Data Protection Policy; According to Article 7/f.1 of the Law No. 6698, when the purpose requiring processing disappears and according to Article 17 and Article 138 of the Turkish Penal Code, when the periods determined by the Laws have passed, it will be anonymized and continued to be used by us.

When the storage periods stipulated in the relevant legislation or required by the purpose of processing expire, within the 6-month period stipulated for periodic destruction; anonymizes the personal data it processes by using one or more techniques that are most suitable for business processes and activities, among the anonymization methods specified in the Guide on the Deletion, Destruction or Anonymization of Personal Data published by the Personal Data Protection Board, and continues to use the data in this way.

In this regard, a Storage and Disposal Policy has been established and is being implemented. Details of the main company procedure in this regard can be viewed from the Storage and Disposal Policy on the site.

## **XVI. POLICY TO BE DONE CHANGES AND UPDATES**

The Company may make changes or updates to this Policy in accordance with legal regulations and Company Policy. Necessary information is provided to the relevant persons on the website about the new Policy text reflecting all these changes and updates.

This Policy has been updated as Version 2 and the necessary regulations have been complied with within the scope of the Law on the Amendment of the Criminal Procedure Law and Certain Laws published in the Official Gazette dated 12/3/2024 and numbered 32487, which also includes provisions regarding the Law on the Protection of Personal Data No. 6698.

**USERSDOT TECHNOLOGY AND CONSULTING INC.**