



Information Notice for Potential Business Partners Shareholders/Employee/Authorized Personnel

Dear Potential Business Partner Shareholder/Employee/Representative,

As Usersdot Technology and Consultancy Inc. ("Usersdot" or "Company"), we would like to inform you that as the data controller, we will record, store, maintain, and share the personal data obtained from Business Partners Shareholders/Employees/Representatives within the framework of the purposes specified below in accordance with the Personal Data Protection Law (KVKK), ensuring the accuracy and most up-to-date state of personal data, in a limited, proportional manner and in compliance with the conditions stipulated by the KVKK with authorized institutions to request personal data.

1. DEFINITIONS RELATED TO THE LAW ON THE PROTECTION OF PERSONAL DATA

Data Controller	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.
The Company	The data controller refers to Usersdot Technology and Consultancy Inc.
Data Subject/Concerned Individual	The data subject is the individual whose personal data is being processed.
Data Processor	The natural or legal person who processes personal data on behalf of the data controller, based on the authority granted by the data controller.
Personal Data	It refers to any kind of information relating to an identified or identifiable natural person.
Sensitive Personal Data	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.
Processing of Personal Data	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.
KVKK	It refers to the Law on the Protection of Personal Data No. 6698.
Board	It refers to the Personal Data Protection Board.
Authority	It refers to the Personal Data Protection Authority.
Data Registry System	It refers to the record system where personal data is processed in a structured manner according to specific criteria.
Explicit Consent	It expresses consent based on information provided on a specific subject and declared with free will.



2. PROCESSED PERSONAL DATA, DATA PROCESSING PURPOSES, AND LEGAL BASIS

In this context, as Usersdot, your personal data is processed for the purposes and legal reasons detailed below.

2.1. Personal Data Processed and Data Categories Regarding Potential Business Partners, Shareholders, Employees, and Authorized Personnel of Usersdot Technology and Consultancy Inc.

As Usersdot Technology and Consultancy Inc., in our capacity as the Data Controller, the following Identity Data, Communication Data and Physical Space Security Data of Potential Business Partners, Shareholders, Employees, and Authorized Personnel are processed: Identity Data including *"Name, Surname, Position, Title"*; Communication Data including *"Email Address, Phone Number"*; and Physical Space Security Data including *"Camera Recordings"*.

2.1.1. Processing of Identity Data

As Usersdot, Identity Data of esteemed Potential Business Partners, Shareholders, Employees, Authorized Personnel such as Name, Surname, Position, and Title are processed. The Data Controller company processes these personal data for the following purposes:

- Execution of Communication Activities,
- Execution of Purchase Processes for Goods/Services,

These data are processed in compliance with the conditions specified in Article 5 of Law No. 6698, namely, **"Directly Related to the Establishment or Performance of a Contract, Mandatory for the Legitimate Interests of the Data Controller Provided that it Does not Harm the Fundamental Rights and Freedoms of the Data Subject,"** and they are stored both at the company headquarters and in electronic media.

2.1.2. Processing of Communication Data

As Usersdot, Communication Data of esteemed Potential Business Partners, Shareholders, Employees, and Authorized Personnel such as Email Address, and Phone Number are processed. The Data Controller company processes these personal data for the following purposes:

- Execution of Communication Activities,
- Execution of Purchase Processes for Goods/Services,

These data are processed in compliance with the conditions specified in Article 5 of Law No. 6698, namely, **"Directly Related to the Establishment or Performance of a Contract, Mandatory for the Legitimate Interests of the Data Controller Provided that it Does not Harm the Fundamental Rights and Freedoms of the Data Subject,"** and they are stored both at the company headquarters and in electronic media.



2.1.3. Processing of Physical Space Security Data

As Usersdot, Physical Space Security Data of esteemed Potential Business Partners, Shareholders, Employees, and Authorized Personnel such as Camera Recordings are processed. The Data Controller company processes these personal data for the following purposes:

- Ensuring Physical Space Security
- Execution of Information Security Processes
- Ensuring Security of Movable Property and Resources
- Pursuit and Execution of Legal Affairs
- Tracking Requests/Complaints

These data are processed in compliance with the conditions specified in Article 5 of Law No. 6698, namely, "**Mandatory for the Legitimate Interests of the Data Controller Provided that it Does not Harm the Fundamental Rights and Freedoms of the Data Subject**" and they are stored both at the company headquarters and in electronic media.

3. DATA COLLECTION METHOD AND LEGAL BASIS

Your Personal Data;

Printed documents (Brochures, business cards, etc.) obtained during face-to-face visits with business partners by relevant departments and information obtained through research conducted on the internet may be collected through any written, verbal, electronic means, whether automatic or non-automatic, for use in accordance with the purposes specified in the Information Notice on the Processing of Personal Data via Camera (CCTV).

4. TRANSFER OF PERSONAL DATA

Your personal data, in accordance with Article 8 of the Personal Data Protection Law and other relevant legislation:

In accordance with the legal basis of the necessity of data processing for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject, may be shared with Authorized Public Institutions or Organizations within the country for the purpose of providing information to authorized individuals, institutions, and organizations, within the scope of the purposes mentioned above and limited to the fulfillment of these purposes.

5. STORAGE PERIOD OF PERSONAL DATA

The Company will retain your personal data for a period of 10 years during the service contract and starting from the termination of the service contract, or for a reasonable period of 2 years if there is no service contract. Visual and audiovisual data in the form of camera recordings will be retained for 90 days from



the date of processing.

6. MEASURES AND COMMITMENTS REGARDING DATA SECURITY

The company undertakes to take necessary technical and administrative measures to ensure an adequate level of security in order to:

- Prevent the unlawful processing of personal data,
- Prevent unauthorized access to personal data,
- Ensure the confidentiality, integrity, and availability of personal data.

The measures taken by the company include but are not limited to:

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.
- 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.

7. YOUR RIGHTS UNDER THE LAW

According to Article 11 of the Law, data subjects have the following rights:

- To learn whether personal data is being processed,
- To request information if personal data has been processed,
- 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 "Barbaros Mahallesi Kardelen Sokak Palladium Tower No:2/10 Ataşehir/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 or to the company's email address 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.