



**Personel Data Protection Legislation Information Notice for Real Person Customer and Employee/Authorized Person of the Real or Legal Person Customer**

Dear, Real Person Customer

Employee/Authorized Person of the Real or Legal Person Customer

As Usersdot Technology and Consultancy Inc. ("Usersdot" or "the Company"), in our capacity as data controller, we hereby inform you that we will process the personal data we obtain in accordance with the purposes specified in the Personal Data Protection Law ("KVKK") and detailed below, and we will record, store, maintain, and share the personal data with authorized institutions legally entitled to request personal data, in accordance with the conditions stipulated by the KVKK, in a manner that is limited, proportional, and relevant to these purposes while ensuring the accuracy and currency of the personal data.

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

<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>Explicit Consent</b>	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.

Personal Data and Data Categories Processed Regarding Real Person Customer	Personal Data and Data Categories Processed Regarding the Employee/Authorized Person of the Real or Legal Person Customer
<p>As Usersdot Technology and Consultancy Inc., in our capacity as Data Controller, we process the following personal data of Real Person Customer:</p> <ul style="list-style-type: none"> <li>- <b>Identity Data:</b> Name, Signature, Signature Circulars, Surname, Turkish Republic ID Number/Tax ID Number, Tax Office, Company Name, Title</li> <li>- <b>Contact Data:</b> Address, Email Address, Phone Number, Fax Number</li> <li>- <b>Financial Data:</b> Bank Name, Branch Name, Account Number, IBAN Number, Payment Amount</li> <li>- <b>Transaction Security Data:</b> Username, Password, IP Address, Website Login-Logout Information</li> <li>- <b>Customer Transaction Data:</b> Payment Term, Payment Days, Payment Amount</li> <li>- <b>Other Data:</b> Request/Complaint Information</li> </ul>	<p>As Usersdot Technology and Consultancy Inc., in our capacity as Data Controller, we process the following personal data of Employee/Authorized Person of the Real or Legal Person Customer;</p> <ul style="list-style-type: none"> <li>- <b>Identity Data:</b> Name, Signature, Signature Circulars, Surname, Company Name, Title</li> <li>- <b>Contact Data:</b> Address, Email Address, Phone Number</li> <li>- <b>Transaction Security Data:</b> Username, Password, IP Address, Website Login-Logout Information</li> <li>- <b>Other Data:</b> Request/Complaint Information</li> </ul>
<p><b>2.1.1. Processing of Identity Data</b></p> <p>Usersdot, esteemed Real Person Customer, processes your Identity Data, including Name, Signature, Signature Circulars, Surname, Turkish Republic ID Number/Tax ID Number, Tax Office, Company Name, and Title. The data controller company processes these personal data for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting Sales Processes of Goods/Services,</li> <li>• Conducting Marketing Processes of Products/Services,</li> <li>• Conducting Communication Activities,</li> <li>• Monitoring Requests/Complaints,</li> <li>• Conducting Financial and Accounting Affairs,</li> <li>• Executing Contract Processes,</li> <li>• Tracking and Executing Legal Affairs,</li> <li>• Conducting/Supervising Business Activities,</li> <li>• Ensuring Compliance with Regulations in Activities,</li> <li>• Managing Customer Relations Processes,</li> </ul> <p>These data are processed in accordance with the conditions</p>	<p><b>2.1.1. Processing of Identity Data</b></p> <p>Usersdot, esteemed Employee/Authorized Person of the Real or Legal Person Customer, processes your Identity Data, including Name, Signature, Signature Circulars, Surname, Company Name, and Title. The data controller company processes these personal data for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting Sales Processes of Goods/Services,</li> <li>• Conducting Marketing Processes of Products/Services,</li> <li>• Conducting After-Sales Support Services for Goods/Services,</li> <li>• Conducting Communication Activities,</li> <li>• Monitoring Requests/Complaints,</li> <li>• Conducting Financial and Accounting Affairs,</li> <li>• Executing Contract Processes,</li> <li>• Tracking and Executing Legal Affairs,</li> <li>• Conducting/Supervising Business Activities,</li> <li>• Ensuring Compliance with Regulations in Activities,</li> <li>• Managing Customer Relations Processes,</li> </ul>

<p>specified in Article 5 of Law No. 6698; <b>"Being Clearly Stipulated in Laws, Being Directly Related to the Establishment or Performance of the Contract, Fulfillment of Legal Obligations of the Company, 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"</b> and stored at the company headquarters and in electronic media.</p>	<p>These data are processed in accordance with the conditions specified in Article 5 of Law No. 6698; <b>"Being Clearly Stipulated in Laws, Being Directly Related to the Establishment or Performance of the Contract, Fulfillment of Legal Obligations of the Company, 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"</b> and stored at the company headquarters and in electronic media.</p>
<p><b>2.1.2. Processing of Communication Data</b></p> <p>Usersdot, esteemed Real Person Customer, processes your Contact Data, including Address, Email Address, Phone Number, and Fax Number. The data controller company processes these personal data for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting Sales Processes of Goods/Services,</li> <li>• Conducting Marketing Processes of Products/Services,</li> <li>• Conducting Communication Activities,</li> <li>• Monitoring Requests/Complaints,</li> <li>• Conducting Financial and Accounting Affairs,</li> <li>• Executing Contract Processes,</li> <li>• Tracking and Executing Legal Affairs,</li> <li>• Conducting/Supervising Business Activities,</li> <li>• Ensuring Compliance with Regulations in Activities,</li> <li>• Managing Customer Relations Processes,</li> </ul> <p>These data are processed in accordance with the conditions specified in Article 5 of Law No. 6698; <b>"Being Clearly Stipulated in Laws, Being Directly Related to the Establishment or Performance of the Contract, Fulfillment of Legal Obligations of the Company, 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"</b> and stored at the company headquarters and in electronic media.</p>	<p><b>2.1.2. Processing of Communication Data</b></p> <p>Usersdot, esteemed Employee/Authorized Person of the Real or Legal Person Customer, processes your Contact Data, including Address, Email Address and Phone Number. The data controller company processes these personal data for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting Sales Processes of Goods/Services,</li> <li>• Conducting Marketing Processes of Products/Services,</li> <li>• Conducting After-Sales Support Services for Goods/Services,</li> <li>• Conducting Communication Activities,</li> <li>• Monitoring Requests/Complaints,</li> <li>• Conducting Financial and Accounting Affairs,</li> <li>• Executing Contract Processes,</li> <li>• Tracking and Executing Legal Affairs,</li> <li>• Conducting/Supervising Business Activities,</li> <li>• Ensuring Compliance with Regulations in Activities,</li> <li>• Managing Customer Relations Processes,</li> </ul> <p>These data are processed in accordance with the conditions specified in Article 5 of Law No. 6698; <b>"Being Directly Related to the Establishment or Performance of the Contract, Fulfillment of Legal Obligations of the Company, 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"</b> and stored at the company headquarters and in electronic media.</p>
<p><b>2.1.3. Processing of Financial Data</b></p> <p>Usersdot, esteemed Real Person Customer, processes your Bank Name, Branch Name, Account Number, IBAN Number, Payment Amount. The data controller company processes these personal data for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting Sales Processes of Goods/Services,</li> <li>• Conducting Financial and Accounting Affairs,</li> <li>• Executing Contract Processes,</li> <li>• Tracking and Executing Legal Affairs,</li> </ul>	<p><b>2.1.3. Processing of Transaction Security Data</b></p> <p>Usersdot, esteemed Employee/Authorized Person of the Real or Legal Person Customer, processes your Username, Password, IP Address, Website Login-Logout Information. The data controller company processes these personal data for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting Sales Processes of Goods/Services,</li> <li>• Conducting/Supervising Business Activities,</li> <li>• Ensuring Compliance with Regulations in Activities,</li> </ul>

<ul style="list-style-type: none"> <li>• Conducting/Supervising Business Activities,</li> <li>• Ensuring Compliance with Regulations in Activities,</li> </ul> <p>These data are processed in accordance with the conditions specified in Article 5 of Law No. 6698; <b>"Being Clearly Stipulated in Laws, Being Directly Related to the Establishment or Performance of the Contract, Fulfillment of Legal Obligations of the Company, 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"</b> and stored at the company headquarters and in electronic media.</p>	<ul style="list-style-type: none"> <li>• Conducting Information Security Processes.</li> </ul> <p>These data are processed in accordance with the conditions specified in Article 5 of Law No. 6698; <b>"Being Directly Related to the Establishment or Performance of the Contract, 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, Explicit Consent of the Data Subject (Regarding User Activities)"</b> and stored at the company headquarters and in electronic media.</p>
<p><b>2.1.4. Processing of Customer Transaction Data</b></p> <p>Usersdot, esteemed Real Person Customer, processes your Payment Due Dates, Payment Days, and Payment Amounts. The data controller company processes these personal data for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting Sales Processes of Goods/Services,</li> <li>• Conducting Financial and Accounting Affairs,</li> <li>• Tracking and Executing Legal Affairs,</li> <li>• Conducting/Supervising Business Activities,</li> <li>• Ensuring Compliance with Regulations in Activities,</li> </ul> <p>These data are processed in accordance with the conditions specified in Article 5 of Law No. 6698; <b>"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"</b> and stored at the company headquarters and in electronic media.</p>	<p><b>2.1.4. Processing of Other Datas</b></p> <p>Usersdot, esteemed Employee/Authorized Person of the Real or Legal Person Customer, processes your specifically Complaints/Requests. These personal data are processed for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting Sales Processes of Goods/Services,</li> <li>• Conducting Marketing Processes of Products/Services,</li> <li>• Conducting Communication Activities,</li> <li>• Monitoring Requests/Complaints,</li> </ul> <p>These data are processed in accordance with the conditions specified in Article 5 of Law No. 6698; <b>"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"</b> and stored at the company headquarters and in electronic media.</p>
<p><b>2.1.5. Processing of Transaction Security Data</b></p> <p>Usersdot, esteemed Real Person Customer, processes your Username, Password, IP Address, Website Login-Logout Information. The data controller company processes these personal data for the following purposes:</p> <ul style="list-style-type: none"> <li>• Conducting Sales Processes of Goods/Services,</li> <li>• Conducting/Supervising Business Activities,</li> <li>• Ensuring Compliance with Regulations in Activities,</li> <li>• Conducting Information Security Processes.</li> </ul> <p>These data are processed in accordance with the conditions specified in Article 5 of Law No. 6698; <b>"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"</b> and stored at the company headquarters and in electronic media.</p>	

<p><b>2.1.6. Processing of Other Datas</b></p> <p>Usersdot, esteemed Real Person Customer, processes your specifically Complaints/Requests. These personal data are processed for the following purposes:</p> <ul style="list-style-type: none"><li>• Conducting Sales Processes of Goods/Services,</li><li>• Conducting Marketing Processes of Products/Services,</li><li>• Conducting Communication Activities,</li><li>• Monitoring Requests/Complaints,</li></ul> <p>These data are processed in accordance with the conditions specified in Article 5 of Law No. 6698; <b>"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"</b> and stored at the company headquarters and in electronic media.</p>	
---	--

### 3. DATA COLLECTION METHOD AND LEGAL BASIS

Your personal data; during the process of contract procurement and membership creation, by entering additional information, with the Usersdot current identification form for new customers, through the collection of information and data via Paraşüt for current customer identification, via cookies by Google, by storing credit card information for Dot Assist or Datadot SaaS product through the Iyzico interface, through the transmission of requests/complaints via email or directly to the customer team, and additionally, all information and documents provided by customers, electronic devices, software, and information systems used in the business, wired/wireless internet usage in accordance with the purposes specified in the Information Text on the Processing of Personal Data can be collected through all kinds of written, verbal, electronic environments by automatic or non-automatic methods.

### 4. TRANSFER OF PERSONAL DATA

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

- For the purposes of providing information to authorized individuals, institutions, and organizations; based on legal grounds such as fulfilling the company's legal obligations, being directly related to the establishment and performance of contracts, being expressly envisaged in laws, and processing data for the legitimate interests of the data controller without harming the fundamental rights and freedoms of the data subject, to Authorized Public Institutions or Organizations within the country,
- To Cloud Service Providers abroad, provided that the appropriate safeguards stipulated in the fourth paragraph of Article 9 of the Law on the Protection of Personal Data are provided for the purposes of carrying out information security processes and ensuring in-house information and document management,
- For the purposes of executing sales processes of goods/services, conducting and supervising business activities, ensuring compliance of activities with legislation, conducting communication activities, and conducting financial and accounting affairs; based on legal grounds such as being directly related to the establishment or performance of contracts, to Third-Party Private Institutions

# usersdot

with which Contracts for External Service Procurement are Made domestically, the data may be shared to the extent necessary for the realization of the above-mentioned purposes and the fulfillment of these purposes.

## 5. STORAGE PERIOD OF PERSONAL DATA

The company will keep your personal data for 10 years after the conclusion of a service contract and for a maximum of 2 years in terms of transaction security data in terms of the Internet Law No. 5651.

## 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.

# usersdot

- 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

# usersdot

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).

**I hereby declare that I have been thoroughly informed by the Company about the Customer/ Employee/ Authorized Person Information Notice in accordance with the Personal Data Protection Legislation. I confirm that I have read and understood the Information Notice.**

.....  
**Signature**  
.....