



## Privacy Notice for Third-Party Visitors in Accordance with Data Protection Legislation

Dear Third-Party Visitors,

Third-Party Visitors: Individuals who enter the www.usersdot.com website for various purposes (Website Visitors) but are not included in other categories of data processed by the Company

Usersdot Teknoloji ve Danışmanlık A.Ş. ("Usersdot" or "the Company") hereby informs you that as the data controller, we process the personal data of Third-Party Visitors in accordance with the purposes detailed below and will record, store, and maintain the accuracy and currency of personal data in a limited and proportionate manner. We also acknowledge that we will share personal data with third parties and companies in accordance with the conditions specified by the Personal Data Protection Law (KVKK) and authorized institutions legally entitled to request 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.

### **Processing of Operational Security Data Regarding Third Party Visitors by Usersdot Technology and Consultancy Inc.**

As Usersdot, Operational Security Data of esteemed Third Party Visitors such as IP Address, Website Log-in/Log-out Information are processed. The Data Controller company processes these personal data for the following purposes:

- Ensuring Compliance with Regulations
- Conducting Information Security Processes,
- 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;

Can be collected through any written, verbal, electronic means, automated or non-automated methods for the purposes specified in the Privacy Notice Regarding the Processing of Personal Data by Google through cookies.

## **4. TRANSFER OF PERSONAL DATA**

Your personal data may be transferred, in accordance with Article 8 of the KVKK and other relevant legislation, for the following purposes:

- For informing authorized individuals, institutions, and organizations, within the scope of the purposes of providing information, provided that the fundamental rights and freedoms of the data subject are not harmed, based on the legitimate interests of the data controller, to Authorized Public Institutions and Organizations within the country.

These transfers are limited to 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 and operational security data for a maximum of 2 years 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.
- 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.

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- 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 " *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).