

**SEKOM İLETİŞİM SİSTEMLERİ SANAYİ VE TİCARET A.Ş**  
**WEBSITE DISCLOSURE TEXT WITHIN THE SCOPE OF THE LAW ON THE**  
**PROTECTION OF PERSONAL DATA NO.6698**

**a) Data Controller**

As **SEKOM İLETİŞİM SİSTEMLERİ SANAYİ VE TİCARET A.Ş.** (hereinafter referred to as the "**Company**"), we hereby inform you that we process your personal data in the capacity of data controller within the scope of the Law No. 6698 on the Protection of Personal Data (hereinafter referred to as "**GDPR**") and other relevant legislation.

**b) Personal Data Processed**

The categories and descriptions of personal data to be processed within the scope of the purposes and legal reasons specified in this Website Clarification Text in accordance with the GDPR and other relevant legislation are as follows:

**Identity Information** : Name-surname, company name.

**Contact Information** : Home phone, cell phone, e-mail address, message content.

**Process Security** : Cookie files, IP address and traffic data in order to ensure the proper functioning and security of the website.

**Audio and Visual Recordings** : Announcement and blog content, photographs, video recordings,

**c) Purpose and Legal Reason of Processing Personal Data**

<b>Purpose of Processing Personal Data</b>	<b>Legal Reason</b>
<ul style="list-style-type: none"><li>- To carry out the necessary work by our business units to ensure that you benefit from the products and services offered by our Company,</li><li>- To contact you to increase bid eligibility and conduct the bid preparation process,</li><li>- To plan and execute the after-sales service and/or maintenance-support services,</li><li>- To contact you in case you request information, documents, offers, technical support and/or application support, service and/or maintenance-support service from our Company</li></ul>	<i>"c) Provided that it is directly related to the establishment or performance of a contract, it is necessary to process personal data belonging to the parties to the contract" specified in Article 5 (2) of the GDPR</i>

<ul style="list-style-type: none"> <li>- To follow-up and execute the legal affairs,</li> <li>- To conduct the finance and/or accounting affairs,</li> </ul>	<p><i>"a) It is clearly stipulated in the laws", "ç) It is mandatory for the data controller to fulfill its legal obligation", "e) Data processing is mandatory for the establishment, exercise or protection of a right" specified in Article 5 (2) of the GDPR</i></p>
<ul style="list-style-type: none"> <li>- To register in online software systems used by the Company for the execution of sales and marketing policies,</li> <li>- To carry out our company's human resources policies,</li> <li>- To evaluate, in case you apply for a job</li> </ul>	<p><i>"e) Data processing is mandatory for the establishment, exercise or protection of a right" specified in Article 5 (2) of the GDPR</i></p>
<ul style="list-style-type: none"> <li>- To share event video and audio recordings on digital platforms such as social media,</li> <li>- To send commercial electronic messages to mail addresses that identify a real person,</li> </ul>	<p>Obtaining explicit consent from the person concerned</p>

**d) To whom and for what purpose the processed personal data can be transferred**

Your personal data will be transferred for the following purposes without seeking the explicit consent of the person concerned in accordance with Article 8 (2) (a) of the GDPR:

- In order to fulfill its legal obligations in accordance with the relevant legislation, it may be shared with the relevant public institutions and organizations if necessary or upon request.
- It may be shared with notaries, enforcement offices and/or courts, if necessary, in order to carry out financial and/or accounting affairs within the scope of collection of fees for products and services.
- In order to follow legal processes, it may be shared with our lawyers as much as necessary within the framework of the confidentiality obligation.

**e) Transfer Abroad**

Your personal data processed on the basis of the legal grounds specified in Article 5 (2) of the GDPR, in line with the conditions for transfer abroad in Article 9 (2) of the GDPR, without obtaining the explicit consent of the person concerned, can be transferred provided that it is limited to;

- (i) foreign countries ("**Foreign Country with Adequate Protection**") declared to have adequate protection by the Personal Data Protection Board (hereinafter referred to as the "**Board**")

- (ii) foreign countries and/or countries where the data controllers in Türkiye and in the relevant foreign country have undertaken in writing to provide adequate protection and where the Board has authorized such transfer ("**Foreign Country Where the Data Controller Undertakes to Provide Adequate Protection**").

In the event that we cannot rely on the two transfer conditions listed above, your personal data will be transferred abroad in accordance with your explicit consent.

The transfer of your personal data processed within the scope of the purposes described above will be carried out by our Company in accordance with the decisions taken by the Board and the relevant regulations, in particular the GDPR and other relevant legislation, by taking all necessary care and taking all necessary security measures.

**f) Method for Collecting Personal Data**

In order to fulfill the purposes specified in paragraph (c) of this text, your personal data are obtained verbally, in writing or electronically by automatic or non-automatic methods, based on the legal reasons specified in Article 5 (2) of the GDPR:

- Filling out forms on the website (<https://www.sekom.com.tr>), sending e-mail messages, visiting the website and contacting through social media platforms.
- Audio recording of phone calls made through the call center.

**g) Your Rights under Article 11 of the GDPR**

Within the scope of Article 11 of the GDPR, you have rights as a data subject and you can submit your requests regarding these rights preferably by filling in all the information specified in the [Data Subject Application Form](#) on our website in accordance with Article 11 and paragraph 1 of Article 13 of the GDPR and *the Communiqué on Application Procedures and Principles to the Data Controller*,

- By personally coming to our Company at the address of “Kızılırmak Mah. 1450.Sokak No:3 Kat 15,70 Nolu Bağımsız Bölüm 06530 Çankaya-Ankara”,
- in writing through a notary public or by registered letter with return receipt in order to determine your identity and not to provide information to the wrong persons,
- (if any) by sending an e-mail to [kvkk@sekom.com.tr](mailto:kvkk@sekom.com.tr) by using the e-mail address previously notified by you to our Company and registered in our systems,

or by other methods to be determined by the Board in the future.