

POS BİLİŞİM TEKNOLOJİLERİ SANAYİ VE TİCARET ANONİM ŞİRKETİ

PROTECTION OF PERSONAL DATA

DATA SECURITY AND PRIVACY POLICY

This Privacy and Data Security Policy ("Privacy and Security Policy") of **POS BİLİŞİM TEKNOLOJİLERİ SANAYİ VE TİCARET ANONİM ŞİRKETİ** (hereinafter referred to as "**POS BİLİŞİM**" and "**Company**") sets out the procedures and principles regarding how we ensure the confidentiality and security of personal data processed by our institution.

At "POS BİLİŞİM," we consider the implementation of the Information Security Policy as one of the vital processes of the institution. It is important to us that you clearly understand how we use your information, how we ensure your security, and how you can protect your privacy while using our services. Therefore, we kindly request that you take the time to read our Privacy Policy carefully.

1. PROCESSING OF PERSONAL DATA OF DATA SUBJECTS

At "POS BİLİŞİM," we process personal data and use internet cookies to provide a better user experience for the visitors of our website (www.posbilisim.com.tr) ("Website") while respecting their privacy and the protection of their personal data rights. Our institution's Cookie Usage Policy ("Policy") is available on our Website and explains to our visitors and users which types of cookies are used under what conditions. This Policy applies regardless of the technologies, methods, and ways in which you connect to the Website.

Minors

If you are under the age of 18, you must visit the Website under the supervision of your parents. You should not use this Website or share any personal data without parental supervision.

2. FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

- To provide information within the scope of the purposes and activities of "POS BİLİŞİM" and its related companies/organizations, offer you the opportunity to benefit from products, services, and facilities related to their fields of activity, and inform you about their content; to notify you about and allow you to benefit from general and special campaigns, promotions, advertisements, discounts, and other advantages; to send greetings and wishes, and to keep you informed about contents and developments related to events,
- To carry out all necessary transactions to provide you with opportunities such as benefiting from invitations and events,
- To use your data for commercial purposes in line with the interests and policies of "POS BİLİŞİM,"
- To conduct statistical studies without disclosing your identity by evaluating personal data and information for service improvement and analysis,
- To inform you about the information, events, and services you request,
- To process your personal data, preferences, transactions, browsing duration, and details on the platforms you access through our website, along with other obtained data,

- To manage applications/apps,
- To ensure the security of your personal data held by "POS BİLİŞİM" and to transfer it for storage purposes,
- To perform copying/backup to prevent data loss,
- To fulfill legal obligations as required or mandated by legal regulations,
- And for other purposes specified in the Personal Data Protection Law (KVKK), your personal data may be processed by "POS BİLİŞİM" and its related companies/organizations, as well as by other real and/or legal persons listed below.

3. TO WHOM ARE YOUR PERSONAL DATA TRANSFERRED AND FOR WHAT PURPOSE?

The personal data obtained due to your visit to our website may be transferred to our business partners, suppliers, legally authorized public institutions, and private persons in line with the purposes for which your personal data is processed, and within the scope of the personal data processing conditions and purposes specified in Articles 8 and 9 of the Personal Data Protection Law (KVKK).

4. WHAT IS THE METHOD AND LEGAL BASIS FOR THE COLLECTION OF YOUR PERSONAL DATA?

Any information that makes your identity specific or identifiable is considered "personal data." Your personal data is collected via cookies, which are technical communication files, within the scope of your visit to our website in accordance with the data processing conditions specified in the Law, and for the legal reasons of the establishment or performance of a contract, legitimate interest, legal obligation, and the establishment, exercise, or protection of a right, as outlined in Articles 5 and 6 of the Personal Data Protection Law (KVKK).

5. INFORMATION AND RIGHTS OF DATA SUBJECTS

As a personal data subject, we inform you that you have the following rights under Article 11 of the Law:

- 1) To learn whether your personal data has been processed,
- 2) If your personal data has been processed, to request information regarding this,
- 3) To learn the purpose of processing your personal data and whether they are used in accordance with their purpose,
- 4) To know the third parties to whom your personal data is transferred domestically,
- 5) To request the correction of your personal data if it has been processed incompletely or inaccurately, and to request that the transaction carried out in this context be notified to the third parties to whom your personal data has been transferred,
- 6) Despite being processed in accordance with the provisions of the Law and other relevant laws, to request the deletion or destruction of your personal data if the reasons for processing them no longer exist, and to request that the transaction carried out in this context be notified to the third parties to whom your personal data has been transferred,
- 7) To object to a result that arises against you by analyzing the processed data exclusively through automated systems,

- 8) To request compensation for the damages in case you suffer damage due to the unlawful processing of your personal data.

You can submit your applications regarding the rights listed above by filling out the Data Subject Application Form available on our website (www.posbilisim.com.tr) or by submitting another written document with the same content to the address of "POS BİLİŞİM" listed below. Depending on the nature of your request, your application will be processed free of charge as soon as possible and within no later than thirty days; however, if the transaction incurs an additional cost, a fee may be charged to you according to the tariff determined by the Personal Data Protection Board.

For detailed information on the principles of protecting and processing your personal data, you can review our Personal Data Processing and Protection Policy at (www.posbilisim.com.tr). You can send all your requests in writing to the postal addresses listed below.

6. ACCESSING AND UPDATING INFORMATION

Through our websites, you can ensure that your contact information, preferences, and other personal data are accurate, complete, and up to date. We never request passwords, credit card information, or other personal data via email. This method of stealing personal data and using it for malicious purposes is called "Phishing."

If you receive a message that appears to be from us but asks for your personal data, you should not respond. We aim to allow you to access your personal data each time you use our services. If this information is incomplete or incorrect, we will initiate the necessary process to update or delete it (unless we need to retain it for a legitimate business purpose or legal reasons). When updating your personal data, we may ask you to verify your identity first to fulfill your request.

7. OUR DATA SECURITY CRITERIA

"POS BİLİŞİM" takes all necessary technical and administrative measures to ensure the confidentiality and security of your personal data, including sensitive personal data collected through our websites and/or other applications, to prevent unlawful processing, unauthorized access, and ensure the preservation of personal data. These measures include, but are not limited to, the following:

- Storing your personal data in secure environments that are not publicly accessible and are only accessible by authorized "POS BİLİŞİM" employees (under the Privacy Agreement with our employees), our agents, and contractors.
- Verifying the identities of our users, whose personal data we store, through the website or application before accessing this information.
- "POS BİLİŞİM" takes appropriate administrative, technical, and physical measures to protect your personal data from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction.
- Secure Sockets Layer (SSL) encryption is used on all web pages where personal data is collected, including online services such as "POS BİLİŞİM" E-Commerce sites. To use these services, you must use an SSL-supported browser such as Safari, Firefox, Chrome, or

Internet Explorer. This ensures the confidentiality of your personal data transmitted over the Internet.

- The Privacy and Security Policy of "POS BİLİŞİM" and the practices it implements to ensure privacy are disclosed to the customer/individual at their request.
- "POS BİLİŞİM" complies with the PCI DSS (Payment Card Industry Data Security Standard) regulations, established to ensure data security in card payment systems, and ensures the secure transmission and processing of data in card payment systems. Your credit card number is encrypted by our online credit card application and transmitted to your bank, and it is never shared with third parties. Your credit card information is not stored by "POS BİLİŞİM."
- "POS BİLİŞİM" may, at its sole discretion, require the use of a 3D payment option to complete customer orders.

8. VALIDITY OF THE PRIVACY AND SECURITY POLICY

Our Privacy and Security Policy applies to all services offered by "POS BİLİŞİM," including advertising and research services.

9. OPTING OUT OF INFORMATION AND ANNOUNCEMENTS

If you do not wish to be included in our announcement and information list, you can opt-out at any time by updating your preferences. You have the authority to access and control the commercial-electronic messages sent to you for notification and communication purposes by "POS BİLİŞİM." If you do not wish to be contacted while your membership to our services continues, you can exercise your "CANCEL" right in digital platforms or by sending an email to kvkk@posbilisim.com.tr. Once you send a request to invalidate this, we will no longer contact you. If you wish to discontinue using our services and opt-out of membership, you can contact our customer service hotline or visit the consultation units in our branches.

10. PRIVACY QUESTIONS AND REMINDERS

Due to the constantly changing nature of internet technologies and the lack of a fixed structure in internet-based business models, this policy is subject to change. Any changes to the Privacy and Security Policy will be communicated to our visitors through our websites and/or applications. We recommend and kindly ask you to visit our website periodically to stay updated on any changes to our Privacy and Security Policy. If you have any questions or concerns regarding "POS BİLİŞİM's" Privacy and Security Policy or data processing, please contact us.

11. SPAM EMAILS

Spamming is the sending of unsolicited emails for advertising, marketing, or promotional purposes without your consent. "POS BİLİŞİM" does not send spam emails. It is illegal to send advertising emails without the recipient's consent. We do not use your personal data (including your email address) for direct marketing or advertising purposes without your permission. We also do not share your personal data with any third parties who would use it for spam emails. Our websites, services, and applications

offer you the opportunity to receive marketing information via email. Every email sent by "POS BİLİŞİM" provides you with the option to stop receiving marketing emails at any time. If you believe you have received a spam email from "POS BİLİŞİM" for any reason, please contact us immediately.

12. LEGAL REASONS AND OTHER MATTERS

"POS BİLİŞİM" may be required to disclose your personal data due to legal requirements, legal processes, lawsuits, and/or requests from public authorities within the country where we operate. In accordance with the Law No. 6698, your information may be disclosed to relevant official authorities when it is deemed necessary or appropriate to share it for national security, the enforcement of laws, or other matters of public importance.

13. ENFORCEMENT OF THE PRIVACY AND DATA SECURITY POLICY

The enforcement date of the Privacy and Data Security Policy is 10.10.2019. If the entire Policy or certain articles are updated, the enforcement date of the Policy will be revised accordingly. The Privacy and Data Security Policy is published on the website of "POS BİLİŞİM" (www.posbilisim.com.tr) and made available to data subjects upon their request.

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