

## POS BİLİŞİM TEKNOLOJİLERİ SANAYİ VE TİCARET ANONİM ŞİRKETİ

### PERSONAL DATA PROCESSING AND PROTECTION POLICY

#### INTRODUCTION

In accordance with the Personal Data Protection Law No. 6698 ("Law"); this POS BİLİŞİM TEKNOLOJİLERİ SANAYİ VE TİCARET ANONİM ŞİRKETİ ("POS BİLİŞİM" or "COMPANY") Personal Data Processing and Protection Policy ("Policy") sets out the procedures and principles that must be followed by "POS BİLİŞİM" in fulfilling its obligations regarding the protection and processing of personal data.

#### 1. PURPOSE and SCOPE

The sustainability of the principle of conducting "POS BİLİŞİM" activities with transparency is aimed. In this context, the fundamental principles adopted by the COMPANY concerning compliance with the regulations in the Personal Data Protection Law No. 6698 ("KVK Law") are determined, and the practices carried out by "POS BİLİŞİM" are explained.

The Policy defines the conditions for processing personal data and sets forth the main principles adopted by "POS BİLİŞİM" in the processing of personal data. Within this framework, the Policy applies to all personal data processing activities within the scope of the Law, targeting individuals whose personal data is processed by the company, whether carried out automatically or through non-automated means, provided that they are part of a data recording system.

"POS BİLİŞİM" reserves the right to make changes to the "Policy" in parallel with legal regulations.

#### 1.1 Definitions

COMPANY	POS BİLİŞİM TEKNOLOJİLERİ SANAYİ VE TİCARET ANONİM ŞİRKETİ
Personal Data	Any information relating to an identified or identifiable natural person.
Special Category of Personal Data	Data related to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, attire, membership in associations, foundations, or trade unions, health, sexual life, criminal convictions, and security measures, as well as biometric and genetic data.
Processing of Personal Data	Any operation performed on personal data, whether fully or partially by automated means or by non-automated means, provided that it is part of a data recording system, such as collection, recording, storage, preservation, alteration, reorganization, disclosure, transfer, acquisition, making available, classification, or prevention of use.

Third Parties and individuals whose Personal Data Is Processed By "Pos Bilişim"	They are third-party natural persons related to these individuals for the purpose of ensuring the security of the commercial transactions between "POS BİLİŞİM" and the aforementioned parties, or to protect the rights of these individuals and secure their interests. Joint debtors (Guarantor, Promissory Note Debtor), companions, family members, and close relatives can be cited as examples of these individuals.
Data Subject / Relevant Person	"COMPANY" refers to its Stakeholders and Employees, Business Partners, Authorized Persons, Job Applicants, Visitors, Group Customers, Potential Customers, Third Parties, and individuals whose personal data is processed by the COMPANY.
Data Recording System	Kişisel verilerin belirli kriterlere göre yapılandırılarak işlendiği kayıt sistemini ifade eder.
Data Controller	It refers to the natural or legal person who determines the purposes and methods of processing personal data and is responsible for establishing and managing the data recording system.
Data Processor	It refers to the natural or legal person who processes personal data on behalf of the data controller, based on the authority granted by the data controller.
Explicit Consent	It is consent that is informed, specific to a particular subject, and freely given.
Anonymization	It is the process of rendering data, previously associated with an individual, impossible to link to an identified or identifiable natural person, even when matched with other data.
Law	It refers to the Personal Data Protection Law No. 6698
Personal Data Protection Board	It is the Personal Data Protection Board.

## 1.2. Validity and Amendments

The Policy has been published on the website of "POS BİLİŞİM" and made available to the public. In the event of any conflict between the provisions of this Policy and the applicable legislation, particularly the Law, the provisions of the legislation shall prevail.

"POS BİLİŞİM" reserves the right to amend the Policy in parallel with legal regulations. The latest version of the Policy can be accessed on the "POS BİLİŞİM" website at [www.posbilisim.com.tr](http://www.posbilisim.com.tr).

## 2. PERSONAL DATA AND DATA SUBJECTS, DATA PROCESSING PURPOSES, AND DATA CATEGORIES

### 2.1. What Are Your Personal Data?

Personal data refers to information that identifies or makes you identifiable. The categories of your personal data that may be processed by the "COMPANY" are listed below.

**Identity Data:** This data category includes types of data such as National ID Number, first name, last name, place, and date of birth, marital status, gender, and a copy of identification documents.

**Family Members and Relatives Information:** Information about the data subject's family members and close relatives.

**Contact Data:** A group of data that can be used to contact the individual (Phone number, postal address, email address, fax number, IP address).

**Special Category of Personal Data:** This data category includes (i) health data collected from personnel within the scope of personnel and occupational safety, (ii) health data of customers.

**Visual Data:** It refers to images of individuals included in photographs taken during employee onboarding or in security camera recordings within the physical premises of "POS BİLİŞİM."

**Personnel Data:** A type of data that includes the identity and contact information of personnel, as well as information such as profession, education, financial data, etc., within the scope of the legally required personnel file created under the employment contract with personnel.

**Contract Data:** It refers to all data processed into the database as a result of contractual relationships between "POS BİLİŞİM" and its customers, business partners, suppliers, and external resources, including signatures, signature circulars, and information about natural persons.

**Location Data:** It refers to all location data processed by "POS BİLİŞİM" for internal audit purposes regarding its employees.

**Reference Information:** CV information collected during the recruitment process, and the names provided as references in the application form.

**Performance Data:** It includes all data processed for internal audit and efficiency improvement within "POS BİLİŞİM" for personnel and for the performance audit of business partners outside "POS BİLİŞİM."

**Employee and Job Applicant Information:** Personal data processed about individuals who have applied to be an employee of "POS BİLİŞİM," or whose application has been evaluated according to the human resources needs of "POS BİLİŞİM" in accordance with commercial practices and good faith, or individuals in an employment relationship with "POS BİLİŞİM."

**Employee's Professional Information:** Position name, department and unit, title, last employment start date, employment start and end dates, insurance entry, social security number, tax office number, pension fund registry number, Bağkur registry number, number of working days, projects worked on, total monthly overtime information, severance pay base date, additional severance pay days, leave seniority base date, additional leave days, leave group, exit/return date, day, reason for leave.

**Professional Experience Information:** Education level, certification and diploma information, foreign language skills, education and skills, CV, courses taken, and information on which education was received on what date.

**Physical Space Security Information:** Personal data related to records and documents such as camera recordings taken during entry to a physical space or while staying within the physical space.

**Visual Data:** Visual recordings that are clearly associated with a specific or identifiable natural person and are included in a data recording system and linked to the data subject.

**Transaction Security Information:** Personal data processed to ensure our technical, administrative, legal, and commercial security while conducting our business activities.

**Risk Management Information:** Personal data processed within the data recording system, clearly associated with an identified or identifiable natural person, to manage the commercial, technical, and administrative risks of "POS BİLİŞİM."

**Financial Information:** Personal data related to any information, documents, and records that show the financial outcomes created depending on the type of legal relationship established between "POS BİLİŞİM" and the data subject.

**Request and Complaint Data:** Personal data related to the receipt and evaluation of any requests or complaints directed to "POS BİLİŞİM."

**Location Data:** The location information of the data subject.

**Other:** Driver's License Information, Military Service Information, Computer Skills, Smoking Habit, Signature and Handwriting Information, Body Measurements for clothing and equipment to be used at the workplace.

### 2.2. Data Subject Categories

The data subjects within the scope of the Policy are all natural persons whose personal data is being processed by "POS BİLİŞİM." In this context, the general categories of data subjects are as follows:

DATA SUBJECT CATEGORIES		DESCRIPTION
1	<b>Employee</b>	Refers to natural persons who perform services under an employment contract at "POS BİLİŞİM."
2	<b>Intern</b>	Refers to natural persons working as interns at "POS BİLİŞİM."
3	<b>Job Applicant</b>	Refers to natural persons who apply for a job at "POS BİLİŞİM" by submitting a CV or through other methods.
4	<b>Third Parties</b>	Refers to natural persons other than those in the above categories and excluding "POS BİLİŞİM" employees.
5	<b>Business Partners/Shareholders/Suppliers and Their Employees</b>	Refers to parties who supply goods or services to "POS BİLİŞİM" in accordance with "POS BİLİŞİM's" instructions and under a contract, for purposes such as conducting "POS BİLİŞİM's" commercial activities, and also includes the employees of these parties.
6	<b>Visitor</b>	Refers to natural persons who visit "POS BİLİŞİM's" premises or website.
7	<b>Customer</b>	Refers to natural persons who benefit from the products and services offered by the Company.
8	<b>Potential Customer</b>	Refers to natural persons who show interest in using the products and services offered by the Company and have the potential to become customers.

The data subject categories are indicated for general information-sharing purposes. The fact that a data subject does not fall within any of these categories does not negate their status as a data subject as defined by the Law.

### 2.3. Purposes of Processing Personal Data

#### For Employees:

- Execution of Information Security Processes
- Execution of Employee Candidate / Intern / Student Selection and Placement Processes
- Execution of Employee Candidates' Application Processes
- Fulfillment of Employment Contract and Statutory Obligations for Employees
- Execution of Processes for Employee Benefits and Perks
- Execution of Emergency Management Processes
- Execution of Employee Satisfaction and Loyalty Processes
- Execution of Audit / Ethical Activities
- Execution of Training Activities
- Execution of Access Authorization Processes
- Execution of Activities in Compliance with Legislation
- Execution of Finance and Accounting Affairs
- Execution of Processes Related to Company / Product / Service Loyalty
- Ensuring Physical Space Security
- Execution of Assignment Processes
- Execution of Communication Activities
- Planning of Human Resources Processes
- Execution / Supervision of Business Activities
- Execution of Occupational Health / Safety Activities
- Receiving and Evaluating Suggestions for Improving Business Processes
- Execution of Business Continuity Activities
- Execution of Logistics Activities
- Execution of Performance Evaluation Processes
- Execution of Storage and Archiving Activities
- Execution of Contract Processes
- Tracking of Requests / Complaints
- Execution of Wage Policy
- Execution of Product / Service Marketing Processes
- Ensuring the Security of Data Controller Operations
- Execution of Talent / Career Development Activities
- Tracking and Execution of Legal Affairs
- Execution of Internal Audit / Investigation / Intelligence Activities
- Providing Information to Authorized Persons, Institutions, and Organizations
- Execution of Management Activities

#### For Job Applicants:

- Execution of Selection and Placement Processes for Applicants Applying with Job Application Forms
- Execution of Job Application Processes
- Execution of Human Resources Operations, particularly recruitment processes
- Execution of Business Continuity Activities
- Ensuring Physical Space Security
- Execution of Recruitment Policies and Employment and Contract Processes within the scope of Human Resources Operations Management
- Tracking of Requests/Complaints
- Execution of Information Security Processes
- Execution of Internal Audit/Investigation/Intelligence Activities
- Execution of Activities in Compliance with Legislation
- Providing Information to Authorized Persons, Institutions, and Organizations
- Execution of Emergency Management Processes
- Execution of Communication Activities
- Execution of Business Continuity Activities
- Execution of activities with legal, technical, and administrative consequences

#### **For Interns/Students:**

- Tracking of Requests/Complaints
- Execution of Information Security Processes
- Execution of Internal Audit/Investigation/Intelligence Activities
- Execution of Activities in Compliance with Legislation
- Providing Information to Authorized Persons, Institutions, and Organizations
- Execution of Emergency Management Processes
- Execution of Communication Activities
- Execution of Business Continuity Activities
- Execution of Activities with Legal, Technical, and Administrative Outcomes
- Regulation and Monitoring of Working Relationships
- Ensuring Physical Space Security
- Organization and Event Management
- Execution of Contract Processes
- Execution of Business Continuity Activities
- Receiving and Evaluating Suggestions for Improving Business Processes
- Ensuring the Security of Movable Property and Resources
- Ensuring the Security of Data Controller Operations
- Execution of Occupational Health and Safety Activities
- Execution of Salary Payments

#### **For Shareholders/Business Partners/Suppliers:**

In the context of the commercial relationship between "POS BİLİŞİM" and your company, the personal data of your company's authorized persons and employees may be processed in accordance with the fundamental principles outlined in the Law and within the conditions for processing personal data, as specified in Article 5 of the Law. This includes the establishment and performance of our contracts, fulfillment of legal obligations, and within the scope of "POS BİLİŞİM's" legitimate interests, for the purposes outlined below.

- Execution of Supply Chain Management Processes
- Fulfillment of functions such as Corporate Resource Planning, Reporting, Marketing, etc.
- Execution of Investment and Product/Service Marketing Processes
- Determination of Risk Limits and Conducting Collateralization Activities
- Conducting Necessary Quality, Confidentiality, and Standard Audits
- Fulfillment of Requirements Set by Laws and Regulations (such as tax legislation, consumer protection legislation, obligations law, commercial law, customs law, electronic communications legislation, and all other relevant legislation)
- Fulfillment of Obligations Related to E-Invoice, E-Dispatch, and E-Archive
- Compliance with Requests from Public Institutions and Organizations as Required or Mandated by Legal Regulations
- Fulfillment of Legal Obligations Specified in the Personal Data Protection Law (KVKK)
- Ensuring the Security of Data Controller Operations
- Ensuring the Security of Movable Property and Resources
- Tracking of Requests/Complaints
- Execution of Storage and Archiving Activities
- Execution of Advertising/Campaign/Promotion Processes
- Execution of Performance Evaluation Processes
- Execution of Marketing Analysis Activities
- Organization and Event Management
- Execution of Activities Aimed at Customer Satisfaction
- Execution of Customer Relationship Management Processes
- Execution of Goods/Service Production and Operation Processes
- Execution of Goods/Service Sales Processes
- Identity Verification and Record Creation
- Signing "POSBİLİSİM" Negotiations and Contracts
- Execution of "POSBİLİSİM" Contract Processes and for Informational Purposes
- Execution of Strategic Planning Activities and Risk Management Processes
- Execution of Goods/Service Procurement Processes
- Execution of Logistics Activities
- Execution of Communication Activities
- Execution of Internal Audit/Investigation/Intelligence Activities
- Execution of Company/Product/Service Loyalty Processes
- Ensuring Physical Space Security and Execution of Post-Sales Support Services for Goods/Services
- Execution of Information Security Processes

#### For Customers:

- Execution of Customer Relationship Management Processes
- Ensuring Physical Space Security

- Conducting Transactions and Activities within the Scope of the Commercial/Contractual Relationship and Fulfilling Financial and Legal Obligations
- Promotion and Marketing of Products and Services, and Communicating with You Regarding These
- Tracking of Requests/Complaints
- Fulfillment of Warranty Obligations under Manufacturer Responsibility
- Ensuring and auditing "POS BİLİŞİM's" quality, information security, and confidentiality policies and standards.
- Recording and tracking payment-related information.
- Preparing reports and analyses for senior management.
- Execution of Activities Aimed at Customer Satisfaction.
- Execution of Customer Relationship Management Processes.
- Execution of Goods/Service Production and Operation Processes.
- Execution of Goods/Service Sales Processes.
- Execution of Post-Sales Support Services for Goods/Services.
- Execution of Goods/Service Procurement Processes.
- Execution of Logistics Activities
- Execution of Internal Audit/Investigation/Intelligence Activities
- Execution of Company/Product/Service Loyalty Processes
- Ensuring Physical Space Security
- Execution of Information Security Processes
- Fulfillment of Requirements Set by Laws and Regulations (such as Tax Legislation, Social Security Legislation, Obligations Law, Commercial Law, Consumer Protection Law, Electronic Communications Legislation, and all other relevant legislation)
- Execution of Goods/Service Sales Processes
- Compliance with Requests from Public Institutions and Organizations as Required or Mandated by Legal Regulations
- Fulfillment of Legal Obligations Specified in the Law

### Potansiyel Müşteriler İçin;

Your identity and contact information, directly obtained from you through your visits to "POS BİLİŞİM" premises, requests for orders and price quotations submitted to our center, complaints, and business cards shared at trade fairs and events (data on business cards are considered publicly available), are processed in accordance with Article 5/2 of the Law. This processing is for the purposes of creating quotations for requested products, establishing contracts, and managing your requests and complaints. Additionally, to keep you informed about "POS BİLİŞİM" products and services and to offer you certain products tailored to you, if you are not a trader or craftsman, your data is processed for marketing purposes based on your consent.

### For Visitors:



In the context of your visits to "POS BİLİŞİM," our website, and other business premises, your identity and visual data are processed through security cameras and visitor logbooks in physical environments for the purposes of ensuring the security of "POS BİLİŞİM" and yourself, fulfilling our legal obligations, and safeguarding our legitimate interests, for the purposes listed below.

- Execution of Audit / Ethical Activities
- Execution of Information Security Processes
- Creation and Tracking of Visitor Records
- Ensuring Physical Space Security
- Providing Information to Authorized Persons, Companies, and Institutions
- Ensuring the Security of Data Controller Operations

### 3. PROCEDURES AND PRINCIPLES TO BE FOLLOWED IN DATA PROCESSING

#### 3.1. Principles Related to the Processing of Personal Data

Your personal data is processed by "POS BİLİŞİM" in accordance with the principles of personal data processing outlined in Article 4 of the Law. "POS BİLİŞİM" places importance on processing your personal data lawfully, in compliance with the principles of fairness, and within the limits of the purpose of data processing.

"POS BİLİŞİM" ensures that personal data is accurate and up-to-date, and grants data subjects the right to request the correction or deletion of their inaccurate or outdated data within this scope.

"POS BİLİŞİM" conducts the necessary evaluations to ensure that personal data is processed for specific, explicit, and legitimate purposes for each category of personal data owner.

"POS BİLİŞİM" ensures that personal data is retained for as long as required by legislation or for the purpose of processing. Once the purpose for processing personal data ceases to exist or the retention period specified by legislation expires, personal data is deleted, destroyed, or anonymized.

#### 3.2. Conditions for the Processing of Personal Data

"POS BİLİŞİM," in accordance with Article 5, Paragraph 2, and Article 8, Paragraph 2 of the Personal Data Protection Law (KVKK), may process personal data without the explicit consent of the data subject in the following circumstances:

- When it is directly related to the establishment of a contract and the performance of services,
- In cases explicitly stipulated by law, or when processing data is necessary for the establishment, exercise, or protection of a right,
- When it is necessary for "POS BİLİŞİM" to fulfill its legal obligations,
- When data processing is necessary for the legitimate interests of "POS BİLİŞİM," provided that it does not harm the fundamental rights and freedoms of the other party (visitor, employee, job applicant, visitor, business partner),
- When it is necessary to protect the life or physical integrity of the person who is unable to express consent due to actual impossibility or whose consent is not legally valid, either for themselves or for another person.

- When the personal data has been made public by the other party, the requested personal data will be provided accurately and up-to-date to "POS BİLİŞİM" and will be processed and transferred by "POS BİLİŞİM."

### 3.3. Conditions for the Processing of Special Categories of Personal Data

Article 6 of the Law specifies special categories of personal data in a limited manner. These include data related to a person's race, ethnic origin, political opinions, philosophical beliefs, religion, sect, or other beliefs, appearance and attire, membership in associations, foundations, or trade unions, health, sexual life, criminal convictions, and security measures, as well as biometric and genetic data.

"POS BİLİŞİM" may process your special categories of personal data under the following circumstances, provided that the necessary precautions are taken:

- Special categories of personal data, excluding data related to health and sexual life, may be processed if the data subject provides explicit consent or if it is explicitly stipulated by law.
- Personal data related to health and sexual life may only be processed without the explicit consent of the data subject for the purposes of protecting public health, preventive medicine, medical diagnosis, the execution of treatment and care services, and the planning and management of health services and their financing, by persons or authorized companies and institutions that are under a legal obligation to maintain confidentiality.

### 4. METHOD AND LEGAL BASIS FOR COLLECTING YOUR PERSONAL DATA

Your personal data is collected through various physical, audio, and electronic means, such as website visits, processes related to the establishment and performance of contracts, recruitment processes, visits to our business premises, and calls to our customer service line. Depending on the nature of the personal data and the purpose of processing, it may be collected based on the legal grounds outlined in Article 5, Paragraph 2 of the Law and subsequent provisions on legal compliance (as explained above). If no such legal basis exists, your personal data will be collected based on your explicit consent. Your personal data may be collected using fully automated, partially automated, or non-automated methods, processed, and transferred for the purposes outlined in this Policy, based on the legal grounds specified below.

- It is stipulated in local or foreign legislation to which "POS BİLİŞİM" is subject.
- It is necessary to process personal data of the parties to a contract, provided that it is directly related to the establishment or performance of the contract, in order to provide the requested products and services or to fulfill the requirements of the contracts you have entered into.
- It is necessary to process data for "POS BİLİŞİM" to fulfill its legal obligations.
- The data has been made public by you.
- It is necessary to process data for the establishment, exercise, or protection of a right, according to the legislation or internal practices of "POS BİLİŞİM."

- It is necessary to process data for the legitimate interests of "POS BİLİŞİM," provided that it does not harm your fundamental rights and freedoms.

## 5. TRANSFER OF PERSONAL DATA

In accordance with Articles 8 and 9 of the Personal Data Protection Law (KVK) and additional regulations determined by the Personal Data Protection Board, personal data may be transferred domestically or internationally if the conditions for the transfer of personal data are met.

The transfer of personal data to third parties within the country may be carried out by "POS BİLİŞİM" if at least one of the conditions for data processing specified in Articles 5 and 6 of the Law and explained under Section 3 of this Policy exists, and provided that the basic principles related to data processing are adhered to.

The transfer of personal data to third parties abroad may be carried out if at least one of the conditions for data processing specified in Articles 5 and 6 of the Law and explained under Section 3 of this Policy exists, and provided that the basic principles related to data processing are adhered to, even in the absence of the individual's explicit consent.

**Under the general principles of the law and within the scope of the data processing conditions stated in Articles 8 and 9, "POS BİLİŞİM" may transfer data to the following Real and Legal Persons:**

- Limited to the procurement of outsourced services (such as software, enterprise resource planning, reporting, marketing, etc.) for the provision and promotion of products and services, as well as for carrying out functions like software, enterprise resource planning, reporting, marketing, etc., and for similar purposes to take advantage of promotions and campaigns, data may be transferred to our business partners and suppliers with whom we cooperate and/or receive services (the names of these business partners should be listed here).
- To audit firms, independent audit firms, customs firms, financial advisors/accounting firms, and law firms, with the limitation of being authorized by law to obtain information and documents from "POS BİLİŞİM" and only for the specified purpose.
- To companies that process data on our behalf (providing IT support, traffic/customer satisfaction measurement, profiling and segmentation support, SMS, mailing, archiving, and other matters requiring the processing of personal data in the fields of sales and marketing).
- To service providers for processing your orders, managing your account, and ensuring the continuity of commercial activities.
- To banks and payment system companies for the purposes of payment services, risk limit determination, collateralization, and debt restructuring.
- To audit firms and information security firms for conducting necessary quality, confidentiality, and standard audits.
- With our supplier OSGB (Occupational Health and Safety Unit) company, for the purposes of carrying out emergency management processes, organizing and managing events, conducting occupational health and safety activities, managing assignment processes, conducting training activities, and carrying out risk management processes.

- With public institutions and organizations to fulfill legal requirements and/or to comply with the requests of official authorities.
- With domestic supplier organizations, consulates, or directly with suppliers located abroad such as airlines, hotels, etc.
- With customers/suppliers located abroad.

## 6. VERİ SAHİPLERİNİN AYDINLATILMASI VE HAKLARI

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

- To learn whether your personal data is being processed,
- To request information if your personal data has been processed,
- To learn the purpose of processing your personal data and whether it is being used in accordance with its purpose,
- To know the third parties within the country to whom your personal data has been transferred,
- 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 third parties to whom your personal data has been transferred,
- To request the deletion or destruction of your personal data in the event that the reasons requiring its processing have disappeared, despite being processed in accordance with the law and other relevant legal provisions, and to request that the transaction carried out in this context be notified to third parties to whom your personal data has been transferred,
- To object to the occurrence of a result against you by analyzing the processed data exclusively through automated systems,

To demand compensation for the damage in case you suffer harm due to the unlawful processing of your personal data.

## 7. ENSURING THE SECURITY AND CONFIDENTIALITY OF PERSONAL DATA

“POS BİLİŞİM” takes all necessary measures within its means to prevent the unlawful disclosure, access, transfer, or other forms of security breaches of personal data, depending on the nature of the data to be protected. In this context, “POS BİLİŞİM” implements all necessary administrative and technical measures, establishes an audit system within the organization, and acts in accordance with the measures stipulated in the Data Protection Law (KVK) in the event of the unlawful disclosure of personal data.

## 8. KİŞİSEL VERİLERİN İMHASI

A DESTRUCTION POLICY, which defines the methods of destroying personal data, has been prepared and published on the “POS BİLİŞİM” website (www.posbilisim.com.tr). All destruction processes are carried out in accordance with this policy. In accordance with Article 7 of the Law, even if the personal data has been processed lawfully, “POS BİLİŞİM” will destroy it ex officio or upon the request of the Data Subject when the reasons for processing no longer exist, in compliance with the Data

Protection and Destruction Policy specifically prepared for this purpose, the legislation, and the guidelines published by “POS BİLİŞİM.”

For each type of data and process, RETENTION PERIODS are clearly defined in the personal data inventory prepared by “POS BİLİŞİM,” which regulates all data processing activities, and these periods are considered during the destruction processes.

In accordance with Article 7 of the Law, even if the personal data has been processed lawfully, when the reasons requiring processing cease to exist, “POS BİLİŞİM” will delete, destroy, or anonymize the personal data ex officio or upon the request of the Data Subject, in compliance with the guidelines published by “POS BİLİŞİM.”

## 9. MATTERS RELATING TO THE PROTECTION OF PERSONAL DATA

In accordance with Article 12 of the Data Protection Law (KVK), “POS BİLİŞİM” takes the necessary technical and administrative measures to ensure an appropriate level of security to prevent the unlawful processing of personal data, prevent unlawful access to the data, and ensure the safeguarding of the data it processes. In this context, “POS BİLİŞİM” conducts or has conducted the necessary audits.

“POS BİLİŞİM” implements technical and administrative measures according to technological capabilities and the cost of implementation to ensure the lawful processing of personal data.

**9.1. TECHNICAL MEASURES:** The main technical measures taken by “POS BİLİŞİM” to ensure the lawful processing of personal data are as follows:

- “POS BİLİŞİM” uses a closed network system for personal data transfers over the network, ensuring both network and application security.
- Penetration testing is conducted by “POS BİLİŞİM.”
- Security measures are taken by “POS BİLİŞİM” within the scope of the procurement, development, and maintenance of information technology systems.
- Access logs are regularly maintained by “POS BİLİŞİM,” and up-to-date antivirus systems and firewalls are used.
- Personal data is backed up by “POS BİLİŞİM,” and the security of the backed-up personal data is also ensured.
- A user account management and authorization control system is implemented by “POS BİLİŞİM,” and these systems are monitored.
- Log records are maintained by “POS BİLİŞİM” in a way that prevents user interference, and attack detection and prevention systems are used by identifying existing risks and threats.
- Encryption is performed by “POS BİLİŞİM,” and data loss prevention software is utilized.

**9.2. ADMINISTRATIVE MEASURES:** The main administrative measures taken by “POS BİLİŞİM” to ensure the lawful processing of personal data are as follows:

- “POS BİLİŞİM” employees are informed and trained on the law of personal data protection and the lawful processing of personal data.

Effective Date	10.10.2019
Publication Date	10.10.2020
Version No/Document No	1.1./
Revision Date	
Page Number	Sayfa 14 / 15

- All personal data processing activities carried out by "POS BİLİŞİM" are conducted in accordance with the personal data inventory and its appendices, which have been created through a detailed analysis of all business units.
- The personal data processing activities conducted by the relevant departments within "POS BİLİŞİM" are bound by written policies and procedures established by "POS BİLİŞİM" to ensure compliance with the personal data processing conditions required by the Personal Data Protection Law (KVKK). Each business unit has been informed about this matter, and specific points of attention regarding the activities they carry out have been identified. Furthermore, protocols and procedures related to the security of special categories of personal data have been established and are being implemented.
- The audit and management of personal data security within the departments of "POS BİLİŞİM" are organized by the Personal Data Protection Committee. Awareness is raised to ensure compliance with the legal requirements determined on a unit basis, and necessary administrative measures are implemented through company policies, procedures, and training to ensure the continuity of this compliance. Internal periodic and/or random audits are conducted and commissioned.
- Service agreements and related documents between "POS BİLİŞİM" and employees include records related to personal data information and data security, and additional protocols are established. Efforts have been made to create the necessary awareness among employees on this issue. The data access rights of employees who have changed duties or left the company are revoked.
- Personal data security issues are quickly reported by "POS BİLİŞİM," and personal data security is monitored.
- Necessary security measures are taken by "POS BİLİŞİM" regarding access to and from physical environments containing personal data, and the security of environments containing personal data is ensured. The security of physical environments containing personal data is also ensured against external risks (fire, flood, etc.).
- Personal data processed by "POS BİLİŞİM" is minimized as much as possible.
- Confidentiality agreements are made by "POS BİLİŞİM."
- Personal data security is monitored by "POS BİLİŞİM," and internal periodic and/or random audits are conducted and commissioned.

## 10. İLETİŞİM

You can submit your applications regarding your rights listed above by filling out the KVK Application Form available on our website at [www.posbilisim.com.tr](http://www.posbilisim.com.tr) or by sending another written document with the same content to our "COMPANY" at the address provided below. For detailed information regarding the principles of protection and processing of your personal data, please review the Personal Data Processing and Protection Policy available at [www.posbilisim.com.tr](http://www.posbilisim.com.tr). You may send all your requests in writing to the postal addresses listed below.

If data subjects (concerned persons) submit their requests regarding their personal data to "POS BİLİŞİM" in writing, "POS BİLİŞİM," as the data controller, will carry out the necessary processes to ensure that the request is resolved as soon as possible and within thirty (30) days at the latest, in accordance with Article 13 of the Personal Data Protection Law.

In the context of ensuring data security, "POS BİLİŞİM" may request information to verify whether the applicant is the owner of the personal data in question. "POS BİLİŞİM" may also ask questions to the data subject to ensure that the request is fulfilled in accordance with the request.

Effective Date	10.10.2019
Publication Date	10.10.2020
Version No/Document No	1.1./
Revision Date	
Page Number	Sayfa 15 / 15

In cases where the data subject's request might impede the rights and freedoms of other individuals, require disproportionate effort, or involve publicly available information, "POS BİLİŞİM" may reject the request by providing a justification.

**POS BİLİŞİM TEKNOLOJİLERİ SANAYİ VE TİCARET ANONİM ŞİRKETİ**

**Adres: Atatürk Mh. Ekinciöđlu Sk. No:2/3-1 34758 Ataşehir / İSTANBUL**

**Mersis No: 0732125648600001**

**Phone: +90 216 573 07 67- 573 07 77**

**Email: [kvkk@posbilisim.com.tr](mailto:kvkk@posbilisim.com.tr)**

**Website: [www.posbilisim.com.tr](http://www.posbilisim.com.tr)**