

**POS BİLİŞİM TEKNOLOJİLERİ SANAYİ VE TİCARET ANONİM ŞİRKETİ**  
**PROTECTION OF PERSONAL DATA**

**CUSTOMER CLARIFICATION AND INFORMATION TEXT**

The Clarification Text has been prepared by POS BİLİŞİM TEKNOLOJİLERİ SANAYİ VE TİCARET ANONİM ŞİRKETİ (“COMPANY” or “POS BİLİŞİM”) as the data controller within the scope of Article 10 of the Personal Data Protection Law No. 6698 (“KVKK”) and the Communiqué on the Principles and Procedures to Be Followed in Fulfilling the Obligation to Inform.

We declare that the personal data submitted to “POS BİLİŞİM” is not used for purposes other than those for which the personal data was obtained, is not processed, and is not shared with third parties without explicit consent or in the absence of any of the exceptional circumstances set forth in Article 5 of the KVKK. We also state that all necessary administrative and technical measures have been taken to ensure an appropriate level of security in this regard.

**1. WHICH PERSONAL DATA OF YOURS IS BEING PROCESSED AND WHAT ARE THE PURPOSES OF PROCESSING YOUR PERSONAL DATA?**

As part of our activities, we collect and process the following data of you, our Customers, for the purposes specified below.

**1.1. Data Categorization**

| Data Groups                         | Personal Data (Including Special Categories)                                                                   |
|-------------------------------------|----------------------------------------------------------------------------------------------------------------|
| Identity Information                | Name, surname, Turkish ID number                                                                               |
| Contact Information                 | Phone number, email address, residential address, registered email address (KEP), IP address, log records      |
| Financial Information               | Tax identification number, credit card information, bank IBAN number, bank account number, billing information |
| Physical Space Security Information | Images recorded by camera surveillance                                                                         |
| Gender Information                  | Gender                                                                                                         |

|                                     |                                                                                                                                                                                      |
|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Visual and Audio Records            | Photos and videos taken in workplace areas (considered as workplace) to be used for “POS BİLİŞİM” promotional activities                                                             |
| Legal Transaction Information       | Personal data contained in information included in correspondences with judicial authorities and in case and response petitions submitted to courts during a potential legal process |
| Customer Transaction Information    | Request information, complaint information                                                                                                                                           |
| Marketing Data                      | Data obtained through surveys, cookie records                                                                                                                                        |
| Health Data (Special category data) | Information on whether the individual has had COVID-19 and/or has been in contact with someone who has                                                                               |

### 1.2. Purposes for Which Personal Data is Processed

| Data Category                             | Purpose of Data Processing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Physical Space Security Information       | Ensuring the Security of Physical Space                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Identity Information, Contact Information | Execution of Emergency Management Processes<br>Execution of Finance and Accounting Affairs<br>Execution of Communication Activities<br>Execution/Audit of Business Activities<br>Execution of Goods/Services Sales Processes<br>Execution of Goods/Services Production and Operation Processes<br>Execution of Customer Relationship Management Processes<br>Management of Organization and Event Insurance Processes<br>Execution of Contract Processes<br>Follow-up of Requests and Complaints<br>Execution of Information Security Processes<br>Conducting Activities in Compliance with Legislation<br>Providing Information to Authorized Persons, Institutions, and Organizations |

|                                        |                                                                                                                                                                                                                                                   |
|----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Financial Information                  | Execution of Finance and Accounting Affairs<br>Conducting Activities in Compliance with Legislation<br>Execution of Goods/Services Sales Processes<br>Execution of Contract Processes                                                             |
| Customer Transaction Information       | Execution/Audit of Business Activities<br>Follow-up of Requests and Complaints<br>Execution of Goods/Services Sales Processes                                                                                                                     |
| Gender                                 | Execution/Audit of Business Activities                                                                                                                                                                                                            |
| Visual and Audio Records               | Visual and Audio Records                                                                                                                                                                                                                          |
| Legal Transaction Information          | Monitoring and Execution of Legal Affairs<br>Execution of Contract Processes<br>Providing Information to Authorized Persons, Institutions, and Organizations                                                                                      |
| Gender                                 | Providing Information to Authorized Persons, Institutions, and Organizations                                                                                                                                                                      |
| Gender                                 | Execution of Goods/Services Production and Operation Processes                                                                                                                                                                                    |
| Visual and Audio Records               | Ensuring the Security of Movable Property and Resources Ensuring the Security of Data Controller Operations                                                                                                                                       |
| Physical Space Security Information    | Ensuring the Security of Physical Space                                                                                                                                                                                                           |
| Health                                 | Providing Information to Authorized Persons, Institutions, and Organizations                                                                                                                                                                      |
| Identity Data, Contact Data            | Execution of Activities Aimed at Customer Satisfaction<br>Execution of Advertising/Campaign/Promotion Processes                                                                                                                                   |
| Identity Data, Contact Data, Marketing | Execution of Loyalty Processes Related to Company/Products/Services<br>Execution of Marketing Analysis Studies<br>Receiving and Evaluating Suggestions for Improving Business Processes<br>Execution of Marketing Processes for Products/Services |

## 2. TO WHOM AND FOR WHAT PURPOSE PERSONAL DATA MAY BE TRANSFERRED

| Recipient Group                                  | Purpose of Transfer                                                                                                                                                    |
|--------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Authorized public institutions and organizations | Upon written request, information may be provided to Courts, Prosecutor's Offices, and Law Enforcement agencies                                                        |
| Business Partner (Banks, Financial Advisors)     | Providing information to the bank for reasons such as credit card collection, fee refund. Auditing of financial records.                                               |
| Business Partner (Financial Advisor)             | Approval of financial and accounting statements by a Sworn Financial Advisor.                                                                                          |
| Business Partner (Insurance Broker)              | Business Partner (Insurance Broker)                                                                                                                                    |
| Supplier (Email Service Provider)                | Transmission of correspondence information related to the purchase of goods and services, the establishment of contractual relationships, and providing notifications. |
| Supplier (Car Rental Company, Transport Company) | Providing delivery note information to the transport company during the shipment of goods.                                                                             |
| Supplier (Information Systems Provider)          | To provide Information Technology Support Services.                                                                                                                    |
| Shareholders                                     | To conduct/supervise business activities.                                                                                                                              |
| Supplier (Measurement and Evaluation Specialist) | To conduct market research and similar studies through surveys on customer satisfaction and related topics.                                                            |
| Authorized Public Institutions and Organizations | Providing information to authorized public institutions and organizations, such as the Ministry of Health, upon request due to the pandemic.                           |
| Private Law Legal Entity                         | To carry out the activities subject to the contract and to fulfill our legal obligations.                                                                              |

### 3. METHOD AND LEGAL BASIS FOR THE COLLECTION OF YOUR PERSONAL DATA

Your personal data may be collected by "POS BİLİŞİM" through the methods of filling out contract forms by you, either automatically or non-automatically, in written, verbal, or electronic environments, for the purposes listed above. Your personal data is collected within the scope of the legal reasons specified in Articles 5 and 6 of the Law, for the purpose of providing you with better and higher quality services, initiating and maintaining the commercial relationship, and offering commercial and administrative activities within the framework of laws regulating business and social life. This collection is based on the establishment or performance of a contract, the legitimate interests and legal obligations of "POS BİLİŞİM," the establishment, exercise, or protection of a right, and, where applicable, the data subject's explicit consent.

### 4. YOUR RIGHTS AS A DATA SUBJECT UNDER ARTICLE 11 OF THE LAW

We hereby inform you that, as a data subject, 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](http://www.posbilisim.com.tr)) or by submitting another written document with the same content to "POS BİLİŞİM." 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](http://www.posbilisim.com.tr)). You can send all your requests in writing to our address listed below or via email to [kvkk@posbilisim.com.tr](mailto:kvkk@posbilisim.com.tr).

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

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