

PRIVACY POLICY FOR THE VISITORS OF THE WEBSITE

Last update and effective date of this page: April 2023

Pursuant to art. 10 of the Personal Data Protection Law No. 6698 (hereinafter the "**Law**"), this page describes the methods of processing the personal data of users (the "**Data Subjects**" or "**Users**") who consult the website www.sisal.com.tr (the "**Site**").

It is specified that this information does not concern other sites, pages or online services that can be reached via hypertext links that may be published on the Site but referring to resources outside the domain or sub-domains of the Site.

Specific information is also published on the pages of the Site prepared for the provision of certain services.

DATA CONTROLLER

The Data Controller (the "**Data Controller**") is Sisal Technology Yazılım Anonim Şirketi, with registered office in Maslak Mah. Bilim Sk. Sun Plaza Blok No: 5A İç Kapı No: 21 Sarıyer/İstanbul, which can be contacted at info_privacy@sisal.com.

CATEGORIES AND TIMES OF CONSERVATION OF THE PROCESSED DATA AND PURPOSE AND LEGAL BASIS OF THE PROCESSING

Navigation data

The computer systems and software procedures used to operate the Site acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This category of data includes, for example, the IP addresses or domain names of the computers and terminals used by the Users, the URI / URL (Uniform Resource Identifier / Locator) notation addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the IT environment of the User.

These data, necessary for the use of web services, are also processed for the purpose of:

- obtaining statistical information on the use of services (most visited pages, number of visitors by time or day, geographical areas of origin, etc.);
- checking the correct functioning of the services offered.

The legal basis of these processing is the pursuit of the legitimate interest of the Data Controller (Article 5 paragraph 2 letter f) of the Law), which is equally balanced with the legitimate interest of the Data Subjects, as the data processing activity personal data is limited to what is strictly necessary for the execution of the operations and other processing indicated in this paragraph. The data will be processed until the legitimate interest of the Data Controller is exhausted, without prejudice to any need to ascertain crimes against the Site or to comply with requests from public authorities and / or supervisory bodies.

Data communicated by the User

The optional, explicit and voluntary sending of messages to the contact addresses published on the Site, the use of telephone / fax numbers, private messages sent by Users to the institutional profiles / pages of the Data Controller on social media (where this possibility is provided for), as well as the compilation and forwarding of the forms on the Site, entail the acquisition of the sender's contact data, necessary to respond to the requests of the same, as well as all personal data communicated by the Data Subject or requested as part of the compilation of any forms. The data thus acquired will be processed for the time necessary to respond to the Data Subject's request and will be deleted after 36 months at the latest.

METHODS OF PROCESSING

The processing of personal data takes place using IT and telematic tools and, residually, manual, with logic strictly related to the purposes highlighted above and, in any case, in compliance with the precautions, guarantees and necessary measures prescribed by the reference legislation, aimed at ensuring the confidentiality, integrity and availability of personal data, as well as avoiding damage, whether material or immaterial (e.g. loss of control of personal data or limitation of rights, discrimination, theft or usurpation of identity, loss financial, unauthorized decryption of pseudonymisation, damage to reputation, loss of confidentiality of personal data protected by professional secrecy or any other significant economic or social damage).

TRANSFER/COMMUNICATION AND DIFFUSION

For the pursuit of the aforementioned purposes, the Data Controller reserves the right to communicate personal data to recipients belonging to the following categories:

- public authorities and / or supervisory bodies (e.g., judicial authorities, public security authorities etc.);
- subjects who carry out data acquisition, processing, processing and storage services;
- subjects that provide services for the management of the Data Controller's information system and telecommunications networks (including chat and mailing services);
- subjects who carry out assistance activities to the Data Subject;
- professional firms or companies in the context of assistance and consultancy relationships;
- subjects who carry out communication assistance and consultancy activities;
- subjects who carry out operations of control, revision and certification of the activities carried out by the Data Controller;
- subjects who for various reasons succeed the Company in the ownership of legal relationships (e.g., transferees or potential transferees of goods, credits and / or contracts).

The subjects belonging to the categories listed above operate independently as separate data controllers, or as Data Processors appointed for this purpose by the Data Controller. The updated list of third parties to whom the data is transmitted is available by sending a request to info_privacy@sisal.com. The data may also be known, in relation to the performance of the assigned tasks, by the Data Controller's staff, specifically authorized by the Data Controller for processing. Personal data, in any case, will not be disseminated and, therefore, will not be brought to the attention of indeterminate subjects, in any form, for example by making them available or consulting, without the express consent of the Data Subject, when required. However, Users who use the forums, or other channels, possibly made available by the Data Controller, to publish their contents, including their personal data, on the Site, acknowledge that the information made public can be read, collected and used by part of third parties who have no relationship with the Data Controller, even for sending unwanted messages. The Data Controller declares himself exempt from liability for any improper use that third parties may make of the personal data that Users choose to publish through the aforementioned channels.

RIGHTS OF THE DATA SUBJECT

Pursuant to article 11, the Law confers on the Data Subjects the possibility to exercise specific rights with regard to the processing of their personal data as follows:

- a) To learn whether their personal data is being processed;
- b) To request information as to the processing;
- c) To learn the purposes for which the data is processed and whether the data is used in accordance with these purposes;
- d) To be informed of the third parties, in Turkey or abroad, to whom their personal data has been transferred;
- e) To request that their personal data be rectified if it is incomplete or inaccurate;
- f) To request that their personal data be deleted or destroyed;

- g) To request that the rectification, deletion or destruction of their personal data upon their request be notified to any third party to whom their data has been transferred;
- h) To object to any result to their detriment reached by the analysis of their personal data exclusively through automated means; and
- i) To request compensation for any damages incurred due to the unlawful processing of their personal data.

The Data Subject may submit requests to the address info_privacy@sisal.com indicating in the subject "Privacy - exercise of privacy rights", detailing which right he intends to exercise and providing the Data Controller with the information needed to identify him pursuant to the Communiqué on Principles and Procedures for Application to the Data Controller published in Official Gazette no. 30356 dated 10 March 2018. The requests will be answered as soon as possible and within 30 days at the latest.

NATURE OF THE PROVISION

Except for what is specified on navigation data, the failure to provide it makes it impossible for the Data Controller to follow up on the interaction with the Site by the Data Subject and, for the Data Subject, to use the Site and all its features, the User is free to provide their personal data to use the features and services made available in the Site. The only consequence deriving from the failure to provide such data will be the impossibility for the Data Subject to use the related services, without this entailing any consequence injurious.

UPDATE OF THIS PAGE

The Data Controller reserves the right to periodically update the content of this page. The Data Subject is therefore invited to periodically consult the information contained herein so as to stay updated with respect to any changes that have occurred since the last consultation.