# PERSONAL DATA PROTECTION AND PRIVACY POLICY

Consent on a specific subject, based on information and expressed with free will

# **DEFINITIONS**

**Open Consent** 

Open Gonsent	Consent on a specific subject, based on information and expressed with nee win	
Anonymisation	In no way, even by matching personal data with other data, can personal data be associated with an identified or identifiable natura to make it impossible to associate	
Application Form	The application to be made by the data subject to exercise his/her rights within the framework of the relevant legislation form containing	
Website	The Company's website with the domain name https://www.lavegasound.com	
Business Partner	While carrying out the commercial activities of the Company, either personally or together with its shareholders companies or gro real or legal persons with whom it has established a business partnership for purposes such as carrying out various projects and rec	
Personal Data	Any information relating to an identified or identifiable natural person	
Processing of Personal Data	Personal data may be stored wholly or partially automatically or as part of any data recording system provided that it is obtained, recorded, stored, preserved by non-automatic means to be changed, amended, reorganised, disclosed, transferred, taken over, data such as making it available, classifying it or preventing its use all kinds of operations performed on	
Sensitive Personal Data	Race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, association, membership of a foundation or trade union, health, sexual life, criminal convictions and security measures data and biometric and genetic data	
Data Owner	Natural person whose personal data is processed	
Data Processor	Real persons or entities that process personal data on behalf of the data controller based on the authorisation granted by the data co legal person	
Data Controller	Determining the purposes and means of processing personal data, systematising the data the natural or legal person who manages the place where it is kept (data recording system)	
ABBREVIATIONS		
KVKK	Protection of Personal Data No. 6698 published in the Official Gazette dated 7 April 2016 and numbered 29677  Law	
KVK Board	Personal Data Protection Board	
Company	LAVEGA PROJECT BIOSCIENCES SOFTWARE AND COMPUTER PROGRAMMING ANONÍ M ŞÍ RKETİ	
Politics	LAVEGA PROJECT BIOSCIENCES SOFTWARE AND COMPUTER PROGRAMMING ANONÍ M ŞÍ RKETÍ Personal Data Protection and Privacy Policy prepared and published by	

### PERSONAL DATA PROTECTION AND PRIVACY POLICY

# 1. INTRODUCTION

As LAVEGA PROJECT BİLİŞİM YAZILIM VE BİLGİSAYAR PROGRAMLAMA ANONİM ŞİRKETİ ("Company"), we attach great importance to the protection of the personal data of our users and members who use the websites of our Company who request and/or receive services from our Company, other real persons who establish a relationship with us by visiting our websites or through our social media accounts or in any other way; persons, companies, business partners who contact / contract with us personally or as a representative of a company or organisation.

In this context, as the Company, we have prepared this Personal Data Protection and Privacy Policy ("Policy") in order to ensure compliance with the Law No. 6698 on the Protection of Personal Data and other legislation and to explain our principles regarding the processing of personal data within the framework of KVKK.

# 2. PURPOSE AND SCOPE

KVKK was published in the Official Gazette dated 7 April 2016 and numbered 29677. KVKK is regulated to protect the fundamental rights and freedoms of natural persons whose personal data are processed, including the right to privacy, and to determine the obligations of natural and legal persons who process personal data.

The purpose of this Policy is to determine the necessary management instructions, procedures and conditions and to establish a technical method to ensure that personal data are processed and protected by the Company in accordance with the KVKK.

This Policy applies to the activities carried out for the processing and protection of all personal data that the Company holds in the capacity of "Data Controller" and/or "Data Processor". The Policy has been handled and prepared based on the KVKK and other legislation on the processing and protection of personal data.

# 3. PERSONAL DATA

### 3.1. Definition of Personal Data

Within the framework of Article 3/I(d) of the LPPD, "personal data" refers to any information relating to an identified or identifiable natural person. In this context, anonymous information, anonymised information and other data that cannot be associated with a specific person are not considered personal data under this Policy.

### 3.2. General Principles for Processing Personal Data

Within the framework of Article 3/I(e) of the LPPD, all kinds of operations that may be performed on personal data such as obtaining, recording, storing, preserving, modifying, reorganising, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or by non-automatic means provided that they are part of any data recording system fall within the scope of "data processing".

The Company processes personal data in accordance with the principles listed below:

- 1. Compliance with the law and honesty rules
- 2. Being accurate and up to date when necessary
- 3. Processing for specific, explicit and legitimate purposes
- 4. Being relevant, limited and proportionate to the purpose for which they are processed
- 5. Retention for the period stipulated in the relevant legislation or required for the purpose for which they are processed

In this context, your personal and/or sensitive personal data obtained by the Company through the Website and all kinds of channels, including but not limited to the Website, in written, verbal or electronic media; Your personal and/or sensitive personal data obtained within the scope of KVKK and other legislation; It can be obtained, recorded, stored, stored, stored, modified

in the ways stipulated in the KVKK, shared with third party natural or legal persons in the country and abroad deemed appropriate by the Company for legal and legal reasons or in line with the legal and actual requirements of the service provided by the Company, and can be processed, including transferring it abroad by other methods.

### 3.3. Data Processed by the Company

#### In General

The Company may process general and special categories of personal data with the explicit consent of the data subject or without explicit consent in cases stipulated in Articles 5 and 6 of the LPPD.

Personal data may be processed by the Company in accordance with the Law No. 6502 on Consumer Protection, the Regulation on Distance Contracts issued within the scope of this law, the Law No. 6563 on the Regulation of Electronic Commerce, the Regulation on Service Providers and Intermediary Service Providers in Electronic Commerce prepared on the basis of this law, the Turkish Commercial Code No. 6102, the Tax Procedure Law No. 213, and all other laws, regulations, communiqués and all other legal regulations related to these laws and the provisions specified in the relevant legislation.

- 1. Other additional data to recognise and differentiate the data subject, such as name, surname, occupation, CV, profession, gender, marital status, nationality,
- 2. In cases where presentation of identity is required, the data contained in documents for identification such as identity card, passport, driver's licence,
- 3. Contact information such as address, telephone, e-mail, fax number and mobile phone number of home, workplace or temporary place of residence,
- 4. Communication records such as telephone calls, e-mail correspondence and other audio and video data, complaint and request records
- 5. Data for the determination of consumer and user habits in order to increase service standards and Website usage data,
- 6. Internet protocol (IP) address, device ID, statistics on web page views and mobile and other digital applications, incoming and outgoing traffic information, routing URL, internet log information, location information, visited sites and information on transactions and actions carried out through our websites, advertisements and e-mail content.

### In Specialised

Personal data that may be processed by the Company in the light of other legislation and in line with the principles contained in this Policy and the legitimate interest of the Company are listed below:

# i. Data on Users of Websites and Online Visitor Data:

- "https://www.lavegasound.com" Website Users' data and online visitor data: User Information (Membership information, User ID number, etc.) IP address, Transaction Security Information (Password information, etc.), Cookie records, data and evaluations showing User and/or Visitor habits and likes, commercial electronic message approval/permission given by the User and/or Visitor in electronic environment, Membership and User Agreement approved by the User and/or Visitor, other written texts on the Website and approved by the User and/or Visitor, commercial electronic messages sent within the scope of the approval given by the User and/or Visitor, records related to the management of request and complaint processes.
- "https://www.lavegasound.com" Website visitor data: IP address, Cookie records, data and evaluations showing Visitor habits and likes, Terms of Use approved by the Visitor, other written texts on the Website and approved by the User and/or Visitor.

# ii. Data of Buyers Purchasing Services and Products through Websites:

"The data of the Buyer receiving the service offered for sale by the Seller on "https://www.lavegasound.com", the data subject to the purchase transaction and the data of the person using the service received: Identity information of the Buyer, passport number, Contact Information (mobile phone, e-mail address, address, etc.), invoice and collection information, type, quantity, price, order date, data of the person receiving the service, campaigns, if any; Commercial electronic message permission given by the Buyer in electronic environment, Distance Sales Agreement approved by the Buyer, other written texts approved by the Buyer, commercial electronic messages sent within the scope of the Buyer's approval, records related to the management of request and complaint processes, IP address, password, password information.

iii. Data on customers who make transactions through the Call Centre: Identity Information (Name, surname, Turkish Republic Identity Number, Passport Number for non-Turkish Citizens), Contact Information (mobile phone, e-mail address, address, etc.)

### 3.4. Purposes of Processing Personal Data

The Company may process personal data for the purposes set out below and may be retained for the period required by these purposes and in any case for the periods required by the legal legislation:

- 1. Fulfilment of all legal and administrative obligations,
- 2. Negotiation, establishment and execution of contracts concluded/intended to be concluded,
- 3. Provision/performance of the service
- 4. Processing of data on online visitors within the scope of other legislation,
- 5. Carrying out the membership process by the Users through the Website, creating and organising the personal account of the Members / Users through the Website and managing the membership transactions through the personal account, informing the person and Members / Users who have commercial electronic message approval of the campaigns and opportunities or providing prices, marketing, other opportunities, benefits, offers and information to the Members / Users.
- 6. To be able to make purchases for the services offered for sale through the Website,
- 7. Follow-up of purchasing transactions and accounting processes,
- 8. Ensuring the security of all websites and other electronic systems, social media accounts and physical environments of the Company,
- Investigation, detection, prevention and reporting of breaches of contract and law to the relevant administrative or judicial authorities,
- 10. Resolve existing and future legal disputes,
- 11. Answering requests and questions, evaluating and resolving complaints
- 12. Realisation of company and partnership law transactions,
- 13. Data processing is mandatory for the establishment, exercise or protection of a right,
- 14. Protection of the legitimate interests of the Company, provided that the fundamental rights and freedoms of the data subject are not harmed.

### 3.5. Transfer of Personal Data

Provided that the Company complies with the general principles listed in the KVKK and the conditions stipulated in Articles 8 and 9 of the KVKK and takes the necessary security measures, in line with the purposes specified in this Policy, the Company may transfer the personal data provided to third parties at home and abroad and process and store them on servers or other electronic media located at home and abroad. Although the third parties to whom personal data may be transferred may vary depending on the type (/user / membership relationship, etc.) and nature of the relationship between the data subject and the Company and various factors such as this, it is generally as shown below:

- (i) Depository institutions, platform owners, data broadcasting organisations, infrastructure providers and other business partners, suppliers and subcontractors that the Company works with in Turkey and abroad,
- (ii) All kinds of official authorities and institutions,
- (iii) Banks for collection purposes and/or institutions authorised for collection purposes and domestic and foreign institutions and other relevant third parties with which the relevant activity is carried out for these purposes.

### 3.6. Method of Collection of Personal Data

The Company may obtain personal data in written, verbal, <u>audio or video recording</u> or other physical or electronic forms for the purposes specified in this Policy within the framework of the conditions specified in Articles 5 and 6 of the KVKK. In addition, personal data may also be collected through other physical environments, websites, electronic transaction platforms, social media and other public media or channels such as events organised, sales and marketing units, customer forms, digital marketing, contracts, applications, forms, offers, cookies used during website visits.

#### 3.7. Retention Period of Personal Data

Except for the cases where it is legally required or permitted to be stored for longer periods, the Company retains the personal data it processes in accordance with the KVKK in accordance with the purposes set out in this Policy and the Personal Data Retention and Destruction Policy for the periods specified in the KVKK and other special laws.

In the event that the purpose of processing personal data is terminated and the retention periods determined by the Company in accordance with the KVKK and other legislation and the Company expire, personal data are stored only for the purpose of evidence in possible legal disputes, to assert the relevant right related to personal data and / or to establish defence or to submit it if requested by the competent official authorities. In determining the aforementioned periods, the statute of limitations and retention periods determined in the relevant legislation for the assertion of the aforementioned right are taken as basis. In this case, the personal data stored in this case are not accessed for any other purpose and access to the relevant personal data is provided only when it is required to be used in the relevant legal dispute

The specified periods are meticulously monitored by the Company and the personal data determined that the above-mentioned retention periods have expired are deleted, destroyed or anonymised by the Company in accordance with the KVKK.

## 3.8. Security and Control of Personal Data

Within the framework of Article 12 of the LPPD, the Company, as the "data controller", takes the necessary technical and administrative measures to ensure the appropriate level of security in order to prevent unlawful processing of personal data and unlawful access to data and to ensure the protection of personal data. For this purpose, (i) activities are carried out in accordance with the internal policies and rules prepared for the protection of personal data, (ii) employees are provided with the necessary training and responsibilities regarding the personal data protection legislation and the internal policies and rules prepared in this direction, (iii) all necessary declarations and commitments are obtained from employees and persons and institutions that process data on behalf of the Company for the confidentiality and protection of data, (iv) necessary information security measures are implemented to ensure the security of personal data inside and outside the Company and to prevent unauthorised access to data, (v) compliance with the internal policies and rules established for the protection of personal data is ensured, (vi) the adequacy of the measures taken is checked and new data security systems are procured and/or existing data security systems are developed and updated according to the needs and possibilities and necessary audits are carried out in this regard.

# Measures taken by the Company for the Protection and Security of Personal Data Company;

- 1. It ensures that all personal data collected are processed in accordance with the principles listed in Article 4 of the KVKK and in compliance with the conditions specified in Articles 5 and 6.
- 2. It fulfils the "Information and Disclosure Obligation", which is the obligation of the data controller within the scope of the KVKK, through the Disclosure Texts published on the internet and all other relevant platforms.
- 3. In its capacity as Data Controller, it creates the necessary infrastructure to ensure that "explicit consent" is obtained for the provision and processing of personal data in accordance with the KVKK, if required by law.
- 4. For communication, marketing, opportunity notifications and promotional purposes; It creates the necessary infrastructure for the provision of personal data in accordance with the KVKK and makes the necessary revisions to the applications within the Company.
- 5. Personal data processed in accordance with the provisions of the LPPD and other relevant laws shall be deleted, destroyed or anonymised by the Company ex officio or upon the request of the data subject, in such a way that it cannot be used or recovered in any way, in the event that the reasons requiring its processing disappear and the periods mentioned in the article titled "Retention Periods of Personal Data" of this Policy and the Personal Data Retention and Destruction Policy expire. In order to ensure data security, the Company imposes restrictions in accordance with the KVKK in internal data access authorisations, and carries out the destruction of the data deemed necessary for destruction.
- 6. It takes all kinds of technical and administrative measures to prevent unlawful processing of personal data and unlawful access to this data, and to ensure that personal data is kept in accordance with the KVKK. Develops in-house encryption policies and configures existing encryption systems for data security and secure storage.
- 7. It takes the necessary in-house measures to prevent data leaks through in-house applications and outsourced support products.

- 8. It determines the legal retention periods in accordance with the relevant legal legislation according to the nature of the data provided, develops and puts into effect the retention policies in accordance with these periods in company practice.
- 9. It takes measures to prevent unauthorised access and use of personal data processed and transferred or received as a result of transfer by different departments within the Company and by natural or legal persons who process personal data on its behalf based on the authorisation granted by the Company.
- 10. It periodically audits the personal data protection activities carried out by natural or legal persons who process personal data on its behalf based on the authorisation it has given.
- 11. Although the necessary technical and administrative measures have been taken regarding the processing, transfer and preservation of personal data; If third parties have unlawful access to personal data; It takes all technical and administrative measures to prevent damage to those concerned in accordance with the relevant legislation on the protection of personal data and KVK Board decisions.
- 12. It periodically monitors and audits that the data recording systems used within the Company are created and used in accordance with the KVKK and the relevant legislation.

### 3.9. Rights of the Data Subject within the Framework of KVKK

Pursuant to Article 11 of the LPPD, data subjects:

- 1. To learn whether their personal data is being processed or not,
- 2. Request information if personal data has been processed,
- 3. To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- 4. To know the third parties to whom personal data are transferred domestically or abroad,
- 5. To request correction of personal data in case of incomplete or incorrect processing,
- 6. To request the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of the KVKK,
- 7. Request notification of the transactions made pursuant to subparagraphs (d) and (e) to third parties to whom personal data are transferred.
- 8. To object to the occurrence of a result against you by analysing the processed data exclusively through automated systems,
- 9. To request compensation for damages in case of damage due to unlawful processing of personal data,

### rights.

In case the data owners wish to exercise any of the above-mentioned rights, they are required to fill in the application form attached to this Policy and submit a wet signed copy of the form together with the information and documents that will identify their identity to the Company's address "İCERENKÖY MAH. DEĞİRMEN YOLU CAD. NO: 31/1A ATAŞEHİR / İSTANBUL" by personal application or via notary public. In the event that the Personal Data Protection Board decides to forward the requests by methods other than those mentioned above, the ways in which the applications can be forwarded will be announced separately.

The Company will evaluate and finalise the requests duly received from the data subjects as soon as possible and in any case within the framework of Article 13 of the LPPD within 30 (thirty) days at the latest depending on the nature of the request.

Although the requests of the data subjects will be finalised free of charge as a rule, if the response to the request requires an additional cost, a fee may be charged in the amounts determined within the framework of the relevant legislation.

# **4. COOKIES AND SIMILAR TECHNOLOGIES**

During access to the websites, electronic platforms, or electronic mail messages or advertisements sent by the Company, the Company may place small data files on the users' computers, mobile phones, tablets or other devices accessed/used; in order to show customised content to visitors and to carry out online advertising activities, small data files that enable the recording and collection of certain data by technical means. These data files placed on computers and other devices may be cookies, pixel tags, flash cookies and web beacons, as well as other similar technologies for data storage purposes. (shortly "Cookies") It is also possible to collect personal data through cookies, and to the extent that the data obtained through cookies constitute person al data under Turkish law, it may be processed by the Company within the scope of this Policy and KVKK. The user can remove cookies and reject cookies by closing the warnings. If the user rejects cookies, the user may continue to use the website in question, but may not be able to access all the functions of the medium in question or may have limited access. Detailed information about cookies and the use of cookies is available in https://www.lavegasound.com Cookie Policy.

# 5. SITES, PRODUCTS AND SERVICES OF THIRD PARTIES

The Company's website may contain links to third party websites and products. Such links are subject to the privacy policies of third parties, third parties and third party sites are independent of the Company and the Company shall not be responsible for the privacy practices of third parties under any circumstances.

# 6. AMENDMENTS

The Company has the right to make changes to this Personal Data Protection and Privacy Policy from time to time in the light of the Regulation articles to be issued in accordance with the KVKK and other legislation and for other reasons, including but not limited to these. The current version of the Policy will be published on the Company's websites and will be made available to users and members on the websites.

### 7.

This Policy will enter into force on the date of its publication and will remain in force until it is removed from the website.

# ANNEX- COMPANY PERSONAL DATA STORAGE AND DESTRUCTION POLICY

#### 1. **DEFINITIONS**

Related User	The person or unit responsible for the technical storage, protection and backup of data except within the organisation of the data controller or with the authorisation and instruction received from the data controller are the persons who process personal data in line with the data subject's personal behaviour.
Destruction	It means the deletion, destruction or anonymisation of personal data.
Periodic Disposal	In the event that all of the conditions for the processing of personal data set out in the Law are no longer applicable Deletion to be carried out ex officio at the recurring intervals specified in the data retention and destruction policy, refers to the process of destroying or anonymising.
Deletion of Personal Data	Making personal data inaccessible and non-reusable in any way for the relevant users process.
Destruction of Personal Data	Personal data cannot be accessed, retrieved and reused by anyone in any way is to make it a reality.
Anonymisation of Personal Data	Personal data may not be used in any way, even by matching with other data, to identify an identified or identifiable person is to make it impossible to associate it with the real person.

### 1. PURPOSE AND SCOPE OF PERSONAL DATA RETENTION AND DESTRUCTION POLICY

The purpose of this Retention and Destruction Policy is to ensure that the personal data of the relevant persons of the Company are processed, stored and protected in accordance with the Law on the Protection of Personal Data ("Law" or "KVKK") and that, despite being processed in accordance with the provisions of the law, in the event that the reasons requiring processing disappear and the legal retention periods expire, the personal data shall be deleted, destroyed or anonymised in accordance with the Regulation on the Deletion, Destruction or Anonymisation of Personal Data ("Regulation"), which constitutes the secondary regulation of the KVKK and the KVKK, published in the Official Gazette dated 28.10.2017 dated 28. 2017 and numbered 30224, which constitutes the secondary regulation of the KVKK and the KVKK, and to establish management instructions, procedural requirements and a technical policy in order to ensure that it is deleted, destroyed or anonymised in accordance with the

Regulation on Deletion, Destruction or Anonymisation of Personal Data ("Regulation") and to ensure that the obligations arising from the Regulation are fulfilled.

This Storage and Destruction Policy applies to the activities regarding the storage and destruction of personal data processed by the Company.

This Storage and Destruction Policy has been handled and prepared based on the KVKK, "Regulation on Deletion, Destruction or Anonymisation of Personal Data" and other legislation on the storage and destruction of personal data.

### 2. DELETION, DESTRUCTION AND ANONYMISATION OF PERSONAL DATA CARRIED OUT BY THE COMPANY

Personal data are retained by the Company only within the retention and limitation periods specified in the relevant legislation and / or for the period required for the purpose for which they are processed. Accordingly, the Company first determines whether there is any period and/or statute of limitations for the storage of personal data in the relevant legislation and stores personal data in accordance with these periods. If no period is stipulated in the relevant legislation, personal data are stored in accordance with the KVKK and for the period required for the purpose for which they are processed.

As regulated in Article 7 of the KVKK, although it has been processed in accordance with the provisions of the relevant law, the Company destroys personal data by deleting, destroying or anonymising it in accordance with Articles 8, 9 and 10 of the "Regulation on Deletion, Destruction or Anonymisation of Personal Data" ex officio or upon the request of the relevant person in the event that the reasons requiring its processing disappear and/or the legal retention periods expire.

In order to fulfil its obligations arising from the Law and the Regulation, the Company has taken the necessary technical and administrative measures; has developed the necessary operating mechanisms in this regard; trains the relevant units to comply with these obligations and makes the necessary assignments in this regard.

# 3. CIRCUMSTANCES REQUIRING THE DESTRUCTION OF PERSONAL DATA AND METHODS OF DELETION, DESTRUCTION AND ANONYMISATION OF PERSONAL DATA

# 1. Circumstances Requiring Destruction of Personal Data

Pursuant to the LPPD and the Regulation, in the cases listed below, personal data belonging to data subjects shall be deleted, destroyed or anonymised by the Company ex officio or upon request:

- 1. Amendment and/or abrogation of other legislative provisions that constitute the basis for the processing, storage and retention periods of personal data in a way to eliminate the obligation to store personal data,
- 2. The purpose requiring the processing or storage of personal data disappears,
- 3. The disappearance of the "Conditions for Processing Personal Data" specified in Articles 5 and 6 of the Law.
- 4. In cases where the processing of personal data takes place only on the basis of "explicit consent", the data subject's withdrawal of consent,
- 5. Acceptance by the data controller of the data subject's application for the deletion, destruction or anonymisation of his/her personal data within the scope of his/her rights referred to in paragraphs 1/e-f of Article 11 of the LPPD,
- 6. The Board decides on the deletion, destruction or anonymisation of personal data,
- 7. Following the expiry of the maximum period of time required for the retention of personal data, there is no legal requirement justifying the retention of personal data for a longer period of time,

### 2. Methods of Deletion, Destruction and Anonymisation of Personal Data

The Company uses deletion, destruction or anonymisation methods in accordance with the KVKK in the destruction of personal data:

- 1. **Deletion Methods:** Depending on the nature of the personal data and the environment in which it is located, the Company uses one or more of the methods of deletion; command deletion from the database, blackout.
- 2. **Destruction Methods:** Depending on the nature of the personal data and the environment in which it is located, the Company uses one or more of the methods of physical destruction, de-magnetisation, overwriting.

3. Anonymisation Methods: In order to anonymise personal data, the Company uses one or more of the following anonymisation methods: regional hiding, removing variables, removing records, generalisation, lower and upper limit coding, global coding, sampling, data exchange, noise addition, micro merging, data hashing and distortion as an anonymisation method according to the nature, size, physical environment, diversity, the benefit to be obtained from the data and the purpose of processing.

# 4. STORAGE AND DESTRUCTION PERIODS

**Storage Periods** 

**Data Categories** 

Data belonging to the Customer, Membership and Buyer and Subject to the Order/Purchase Transaction	10 years after the termination of the legal relationship under the Turkish Commercial Code No. 6102;
Call Centre Voice Recordings	10 years after the termination of the legal relationship under the Turkish Commercial Code No. 6102, 10 years after the termination of the legal relations then 10 years,
All records of financial and accounting transactions	10 years within the scope of Turkish Commercial Code No. 6102, 5 years within the scope of Tax Procedure Law No. 213
Records related to electronic commerce transactions	3 years from the transaction date
Commercial Electronic Message records	3 years from the date of withdrawal of approval

# 5. TECHNICAL AND ADMINISTRATIVE MEASURES TAKEN BY THE COMPANY FOR THE SECURE STORAGE OF PERSONAL DATA AND THE PREVENTION OF UNLAWFUL PROCESSING AND ACCESS TO PERSONAL DATA

- Necessary technical and administrative measures have been taken by the Company to prevent unlawful processing of personal data, unlawful access to personal data, and to ensure that personal data are kept in accordance with the KVKK.
- 2. The Company limits the access authorisations of the personnel in order to ensure data security and to limit authorisation.
- 3. Limits personnel access authorisations on the company main server.

- 4. In order to ensure data security within the company, encryption techniques are introduced and periodic password change obligation is applied.
- 5. The Company protects all areas on the website or mobile application where personal data is received with SSL.
- 6. Software and hardware including virus protection systems and firewalls are installed in the Company and on the platforms owned by the Company.