**Privacy and Personal Data Protection Policy**

Softtech Yazılım Teknolojileri Araştırma Geliştirme ve Pazarlama Ticaret A.Ş. ("Softtech") hereby adopts as a fundamental principle the assurance of confidentiality and security of information obtained pursuant to your visit to our website or utilization of our applications.

We acknowledge that such an approach constitutes our legal obligation. Accordingly, this Privacy Policy has been established to provide information by elucidating the conditions under which your information is processed or transferred by Softtech and the manner in which your information is protected.

Within the framework of our approach concerning the exercise of utmost diligence in protecting your information and ensuring compliance with applicable legislation, we diligently oversee the protection of your information to guarantee that all our personnel demonstrate the requisite sensitivity at the highest level in this regard. All services rendered to you by Softtech through any channels shall hereinafter be referred to as the "Service".

**1. SCOPE OF PRIVACY AND PERSONAL DATA PROTECTION POLICY**

As part of the Service rendered, Softtech may obtain or transfer information pertaining to you as Service recipients within the scope of this Privacy Policy. The acquisition or transfer of such information is conducted in strict accordance with applicable legislation. This Privacy Policy does not reflect the privacy practices of third parties to whom information is transferred, and Softtech bears no responsibility for their privacy policies or practices.

This Privacy Policy does not encompass information collected by applications beyond Softtech's control, third-party websites and platforms, information collected by third parties through links on Softtech's website, or titles, campaigns and other advertisements or promotions on third-party websites sponsored and/or participated in by Softtech. Softtech shall not be held liable for the processing of personal data that third parties collect, store or process through their respective websites.

2**. PERSONAL DATA**

Your personal data is collected through automatic and non-automatic means and processed in a limited and proportionate manner for the purposes specified in the information notice provided to you, primarily to ensure the continuity of the Services rendered by Softtech.

Your personal data may be transferred to third parties by Softtech in accordance with applicable legislation. The third parties to whom your personal data may be transferred comprise our business partners, subsidiaries, affiliates, suppliers, customers or authorized public institutions and organizations.

Softtech provides information to you within the scope of personal data processing or transfer activities and seeks your explicit consent where required. You may access detailed information regarding the processing and transfer of your personal data from the Information Notice provided by Softtech through the website you visit or the application from which you receive Service.

**3. SECURITY**

The security measures implemented by Softtech during the processing of your data are as follows:

Network and application security are ensured.

Security measures are implemented in the procurement, development, and maintenance of information technology systems.

The security of personal data stored in the cloud is ensured.

Employees are regularly provided with training and awareness programs on data security.

Access from external networks is blocked by firewall systems.

Data leakage is monitored through the use of a Data Loss Prevention (DLP) product.

Vulnerability scans are performed on servers using the Nessus product.

A two-factor authenticated VPN connection is used for access to the internal network.

Security products are employed to protect against potential attacks via email.

Access logs are regularly maintained.

Corporate policies on access, information security, usage, storage, and destruction have been established and implemented.

Confidentiality agreements are executed.

Authorizations of employees who change roles or leave the company are revoked.

Up-to-date antivirus systems are utilized.

Executed contracts include data security provisions.

Policies and procedures regarding the security of personal data have been defined.

Personal data security incidents are promptly reported.

Personal data security is monitored.

The security of environments containing personal data is ensured.

The volume of personal data is minimized as much as possible.

Personal data is backed up, and the security of the backups is also ensured.

User account management and authorization control system is implemented and regularly monitored.

Internal periodic and/or random audits are conducted or commissioned.

Existing risks and threats have been identified.

Cybersecurity measures have been taken and are continuously monitored for implementation.

The highest level of software and hardware security measures is applied, in accordance with the current state of the art.

**4. COOKIE USAGE**

Tracking technologies such as cookies, pixels, and gifs (“Cookies”) are small data files that are placed on your devices—such as tablets, phones, or computers—when you access our websites or applications. These Cookies enable our servers to recognize your devices and, for example, remember your language preferences, stored usernames and passwords, or items in your shopping cart, and to manage on-site traffic efficiently.

Cookies also assist us in enhancing our software to offer you a better user experience, by analyzing the number and profile of visitors to our websites and applications.

For more detailed information regarding the Cookies we use, please refer to the Cookie Information Notice available on the Softtech websites and applications you access. You may also personalize your cookie preferences at any time by adjusting your browser settings.

**5. INFORMATION UPDATE AND CHANGES**

Softtech reserves the right to modify the content of this Privacy Policy without prior notice, in order to maintain up-to-date privacy and data protection principles and to ensure continued compliance with applicable legislation. The revised Privacy Policy shall be duly published on the official Softtech website.

You may at any time access the most current version of this Privacy Policy at www.softtech.com.tr. By continuing to use Softtech’s Services and/or applications following any such amendments, you shall be deemed to have accepted the modifications introduced. The amended provisions of this Privacy Policy shall enter into force as of the date of their publication on the website.

You may submit your applications concerning your rights under Article 11 of the Personal Data Protection Law to Softtech via the following addresses:

**Submission by Post:**

You may complete our Personal Data Application Form and submit your request, bearing a wet-ink signature, either in person or via post to the following address:

İTÜ Ayazağa Campus, Reşitpaşa Mahallesi, Katar Caddesi, İTÜ Teknokent ARI-3 Building, No: 4, Floor: 4–5, 34469 Maslak–Sarıyer/İstanbul.

**Registered Electronic Mail (KEP) Address:**

softtech@hs02.kep.tr

**E-mail Address:**

If you have previously provided us with an e-mail address and it has been duly registered in our system, you may submit the application form to kvkk@softtech.com.tr using that registered e-mail address.

(If the e-mail address from which you send the application is not registered in the Softtech system, your submission must be signed with a secure electronic signature or a mobile signature.)

**Contact Information**

Softtech Yazılım Teknolojileri Araştırma Geliştirme ve Pazarlama Ticaret A.Ş. İTÜ Ayazağa Campus Reşitpaşa Mah. Katar Cad. İTÜ Teknokent Arı-3 No:4 Floor-4-5 34469 Maslak-Sarıyer-İstanbul Tel: +90 850 290 6000 Fax: +90 212 328 1199