

**ARKSOFT BİLİŞİM TEKNOLOJİ TİC. SAN. A.Ş.**  
**PRIVACY NOTICE ON THE PROTECTION OF PERSONAL DATA**  
**Version 1.0 — Effective Date: 26.08.2026**

## **1. IDENTITY OF THE DATA CONTROLLER**

This Privacy Notice has been prepared by ARKSOFİT BİLİŞİM TEKNOLOJİ TİC. SAN. A.Ş. ("ARKSOFT", the "Company"), in its capacity as data controller, within the scope of Article 10 of the Law on the Protection of Personal Data No. 6698 (the "Law" or "KVKK") and the Communiqué on the Procedures and Principles to be Followed in the Fulfilment of the Obligation to Inform.

- **Trade name:** ARKSOFİT BİLİŞİM TEKNOLOJİ TİC. SAN. A.Ş.
- **Address:** Üniversiteler Mahallesi 1596. Cadde Teknokent Kuluçka Merkez Binası C Blok Kat 9 No 74 Çankaya / ANKARA
- **MERSİS No:** 0079041681000001
- **Tax No:** 0790416810
- **Telephone:** 0312 502 21 21
- **E-mail:** info@arksoft.com.tr
- **Websites:** https://www.arksoft.com.tr

### **Matters falling outside the scope of this Notice**

With regard to the personal data contained in the information systems of the corporate customers that use its products, ARKSOFİT acts not as a data controller but as a data processor. The rights and obligations within this scope are governed by the Data Processing Agreement concluded between the customer and ARKSOFİT and fall outside the scope of this Privacy Notice. The employees and users of our customers must direct their requests concerning their own data to their own organisations (the data controller).

## **2. SCOPE**

This Privacy Notice covers the activities listed below, which ARKSOFİT carries out in its capacity as data controller. The Notice applies to all of the Company's websites; the cookies and tracking technologies actually used on each site are separately set out in the Cookie Notice published on the relevant site.

- Visits to the websites and the processing of data by means of cookies,
- Receipt of contact, information and demo requests,
- Receipt of technical support and customer service requests,
- Newsletter subscription and transmission of commercial electronic messages,
- Event, webinar and training registrations,
- Receipt and evaluation of job applications,
- Commercial communication conducted with suppliers, business partners and customer representatives.

## **3. PERSONAL DATA PROCESSED, PURPOSES OF PROCESSING AND LEGAL GROUNDS**

### **3.1. Visits to the websites**

**Data processed:** IP address, browser and device information, operating system, pages visited, date and time of the visit, referring address, cookie identifiers, cookie preference records.

**Purposes:** Operation of the website and provision of its basic functions, ensuring information and system security, error detection, remembering preferences, generation of visit statistics and conduct of promotional activities.

**Legal grounds:** With regard to mandatory cookies, Article 5/2-(ç) of the KVKK (legal obligation) and Article 5/2-(f) (legitimate interest — ensuring the secure operation of the site); with regard to functional, analytical and advertising/marketing cookies, Article 5/1 of the KVKK (explicit consent).

### **3.2. Contact, information and demo requests**

**Data processed:** Name, surname, corporate e-mail address, telephone number, company title, position/department information, content of the request and correspondence records.

**Purposes:** Receipt of and response to the request, provision of information about products and services, conduct of demo and quotation processes, management of pre-contractual negotiations.

**Legal grounds:** Article 5/2-(c) of the KVKK (being directly related to the conclusion or performance of a contract) and Article 5/2-(f) (legitimate interest — conduct of commercial activity).

### **3.3. Technical support and customer service requests**

**Data processed:** Name, surname, corporate contact details, the organisation represented, content of the support record, technical logs and screenshots, correspondence records.

**Purposes:** Recording and resolution of support requests, measurement of service quality, fulfilment of contractual obligations, evidence in the event of a dispute.

**Legal grounds:** Article 5/2-(c) of the KVKK (performance of a contract), Article 5/2-(e) (establishment and protection of a right), Article 5/2-(f) (legitimate interest).

### **3.4. Newsletter subscription and commercial electronic messages**

**Data processed:** Name, surname, e-mail address, telephone number, company and position information, message transmission and interaction records, consent records.

**Purposes:** Transmission of product announcements, sectoral content and event invitations, conduct of promotional and marketing activities.

**Legal ground:** Article 5/1 of the KVKK (explicit consent). In addition, the consent obtained pursuant to the Law No. 6563 on the Regulation of Electronic Commerce is registered through the Message Management System (İYS). Consent may be withdrawn at any time and an opt-out option is provided in every message.

### **3.5. Event, webinar and training registrations**

**Data processed:** Name, surname, corporate contact details, organisation and position information, registration record; and, in the event that the activity is recorded, audio and video recordings.

**Purposes:** Management of registration and participation processes, provision of information before and after the event, issuance of certificates of participation.

**Legal grounds:** Articles 5/2-(c) and 5/2-(f) of the KVKK; and, with regard to audio and video recording and the use of the recording for promotional purposes, Article 5/1 (explicit consent).

### **3.6. Job applications**

**Data processed:** Name, surname, contact details, information on education, professional experience and competencies contained in the CV, the position applied for, length of experience, location information, LinkedIn profile link, reference information, interview evaluation notes, date and time of the application.

**Purposes:** Evaluation of the application, conduct of recruitment processes, matching with vacant positions, fulfilment of legal obligations arising from recruitment.

**Legal grounds:** Article 5/2-(c) of the KVKK (being directly related to the conclusion of a contract), Article 5/2-(ç) (legal obligation), Article 5/2-(e) (establishment and protection of a right) and Article 5/2-(f) (legitimate interest). With regard to the retention of the application in the candidate pool for positions other than the relevant position and for positions that may arise in the future, Article 5/1 (explicit consent).

Candidates are not requested to share special categories of personal data such as health information, criminal convictions, religion, membership or biometric data. In the event that such data are included in the CV, the relevant data are not taken into evaluation and are deleted at the first opportunity.

### **3.7. Commercial communication with suppliers, business partners and customer representatives**

**Data processed:** Name, surname, position, corporate contact details, signature and authorisation documents, information relating to invoicing and payment processes, correspondence records.

**Purposes:** Establishment and conduct of the commercial relationship, management of contractual processes, fulfilment of financial and legal obligations.

**Legal grounds:** Article 5/2-(a) of the KVKK (being expressly provided for by the laws), Article 5/2-(c) (performance of a contract), Article 5/2-(ç) (legal obligation) and Article 5/2-(f) (legitimate interest).

### **3.8. Visitor identification and determination of potential customers**

**Data processed:** IP address, pages visited, date and time of the visit, time spent on the page, device and browser information; and corporate information such as company name, sector, size and location obtained as a result of the matching of these data with the service provider's database.

**Purposes:** Identification of corporate visitors to the website, determination of potential customers showing interest in our products and services, conduct and planning of sales and marketing activities.

**Legal ground:** Article 5/1 of the KVKK (explicit consent). This activity is carried out only in the event that consent is given to the advertising and marketing cookies category; the relevant tracking technology is not activated unless consent is given.

The service provider used within the scope of this activity is established in the United States of America; the relevant transfer is subject to the principles explained in Article 6 of this Notice. The matching in question is performed at company level, and no automated decision producing legal consequences concerning the data subject or significantly affecting the data subject is taken. The identity of the tool used and the retention period are set out in the Cookie Notice.

## **4. METHOD OF COLLECTION OF PERSONAL DATA**

Personal data are collected by partly automated or non-automated means, through the forms on the websites, e-mail, telephone, cookies and similar tracking technologies, event registration platforms, career websites and documents transmitted directly.

## **5. TRANSFER OF PERSONAL DATA**

Your personal data may be transferred to the following groups of recipients, in accordance with the conditions stipulated in Articles 8 and 9 of the KVKK and limited to the purposes specified in Article 3 of this Notice:

- **Suppliers and service providers:** Website hosting, e-mail, cloud and information technology infrastructure providers,
- **Software and platform providers:** Customer relationship management (CRM), support ticketing, event management and newsletter transmission platforms,
- **Analytics, advertising and visitor identification service providers:** For the purposes of measuring site usage, conducting promotional activities and determining potential customers, only in the event that explicit consent is given,
- **In recruitment processes:** To career and application management platform providers for the purpose of evaluating your application; and, only in the event that your explicit consent exists, to the business partners with whom cooperation is carried out in recruitment processes, to the extent necessary and for the purpose of assessing the suitability of your application for positions that may arise in the future,
- **Professional advisers:** Certified public accountants, independent auditors and legal counsel,
- **Competent authorities:** Competent public institutions and organisations and judicial authorities, upon request and as required by the legislation.

The above transfers are based on the legal grounds of being expressly provided for in the Law, being directly related to the conclusion or performance of a contract, enabling the Company to fulfil its legal obligations, the processing of data being mandatory for the establishment, exercise or protection of a right, and the legitimate interests of the Company. In cases where these legal grounds do not exist, the transfer is carried out solely on the basis of your explicit consent.

Within the Company, your personal data may be accessed only by authorised employees who are required to access them by virtue of their job description; such access does not constitute a transfer within the meaning of the Law.

## 6. TRANSFER OF PERSONAL DATA ABROAD

The Company's websites and related systems are hosted on the Microsoft Azure cloud infrastructure, in the West Europe (Netherlands) region. For this reason, the personal data collected within the scope of this Notice are transferred abroad within the meaning of the KVKK.

In addition, the analytical and advertising/marketing tools used on the websites and certain cloud-based software services are provided by providers that locate their servers abroad. Unless explicit consent is given with regard to non-mandatory cookies and tracking technologies, the relevant tools are not activated and no additional transfer takes place within this scope.

Transfer abroad is carried out within the framework of the conditions stipulated in Article 9 of the KVKK; by way of transfer to countries for which an adequacy decision has been issued by the Board, or provided that appropriate safeguards such as a standard contract, an undertaking or binding corporate rules are ensured. In the event that standard contracts are concluded, notification is made to the Personal Data Protection Authority within the period stipulated in the legislation. In the event that you request a copy of the safeguards applied, it is provided to you with the information constituting a trade secret removed.

## 7. RETENTION PERIODS

Personal data are retained for the period required by the purpose of processing, taking into account the periods of limitation and retention periods stipulated in the legislation. When the purpose ceases to exist or in the event that consent is withdrawn, the data are deleted, destroyed or anonymised. Deletion and destruction operations are performed within the periodic destruction periods.

| Type of data                                                     | Retention period                                                                     |
|------------------------------------------------------------------|--------------------------------------------------------------------------------------|
| Cookie data                                                      | Varies depending on the type of cookie; the periods are set out in the Cookie Notice |
| Cookie preference (consent) records                              | 6 months                                                                             |
| System log records                                               | 6 months                                                                             |
| Security log records                                             | 1 year                                                                               |
| Records of acknowledgement that the privacy notice has been read | 3 years                                                                              |
| Contact, demo and quotation records                              | 1 year where no commercial relationship is established                               |
| Support records and contract documents                           | 10 years as of the termination of the contractual relationship                       |
| Commercial electronic message consent and transmission records   | 1 year as of the date on which the validity of the consent ends                      |
| Job application and CV data                                      | 6 months                                                                             |
| Candidate pool (where explicit consent has been given)           | 2 years                                                                              |
| Event and webinar records                                        | 1 year                                                                               |
| Visitor identification data                                      | 90 days                                                                              |

## 8. AUTOMATED DECISION-MAKING

In the activities within the scope of this Notice, no decision producing legal consequences concerning the data subject or significantly affecting the data subject is taken based exclusively on analysis carried out by means of automated systems. The interest-based grouping activity carried out within the scope of advertising and marketing cookies does not constitute a decision of this nature.

## 9. RIGHTS OF THE DATA SUBJECT UNDER THE KVKK

Pursuant to Article 11 of the KVKK, you have the following rights as a data subject:

- To learn whether your personal data are processed,
- To request information if they have been processed,
- To learn the purpose of processing and whether they are used in accordance with such purpose,
- To know the third parties to whom the data are transferred within the country or abroad,
- To request the rectification of data that have been processed incompletely or incorrectly,
- To request the erasure or destruction of the data within the framework of the conditions stipulated in the Law,
- To request that the rectification, erasure and destruction operations be notified to the third parties to whom the data have been transferred,
- To object, in the event that a result to your detriment arises from the analysis of the data exclusively by means of automated systems,
- To request the compensation of the damage in the event that you suffer damage due to unlawful processing.

## 10. APPLICATION METHOD

Pursuant to the Communiqué on the Procedures and Principles of Application to the Data Controller, you may submit your requests in writing to the Company's address by means of a petition bearing a wet-ink signature, by secure electronic signature or mobile signature, or from the electronic mail address previously registered in the Company's systems to [info@arksoft.com.tr](mailto:info@arksoft.com.tr). If you wish, you may use the **Data Subject Application Form** available on our website; use of the form is not mandatory.

Your application must contain your name, surname, signature, Republic of Türkiye identity number (nationality and passport number for foreign nationals), address for service of notice, electronic mail address and telephone number for notification purposes, if any, and the subject matter of the request. Applications are concluded free of charge as soon as possible and in any event within thirty (30) days as of the date on which they reach the Company. In the event that the process also requires a cost, a fee may be charged in accordance with the tariff determined by the Board.

In applications to be made through a representative, a power of attorney containing special authority must be attached to the application. Identity verification may be carried out in order for the application to be concluded.

In the event that the application is rejected, the response given is found insufficient or no response is given within the prescribed period, you may file a complaint with the Personal Data Protection Board within thirty (30) days as of the date on which you become aware of the response and in any event within sixty (60) days as of the date of the application.

## 11. UPDATES

This Privacy Notice may be updated in line with amendments to the legislation and changes occurring in data processing activities. The current version is published on our websites together with the version number and effective date.