

# COOKIE POLICY

## KLINGER TURKEY ESNEK BAĞLANTI ELEMANLARI TİCARET VE SANAYİ ANONİM ŞİRKETİ

KLINGER Turkey Esnek Bağlantı Elemanları Tic. ve San. A.Ş. (“KLINGER Turkey”) uses cookies and similar technologies on its website to ensure a secure, stable and technically functional browsing experience for visitors.

This Cookie Policy has been prepared to inform visitors of the KLINGER Turkey website about the types of cookies used, the purposes for which these cookies are processed and how cookie preferences may be managed.

KLINGER Turkey does not aim to engage in unnecessary data collection or excessive tracking activities beyond the technical and operational needs of the website. However, certain technical data may be processed through analytics, performance and digital infrastructure services used on the website.

If you prefer not to allow cookies, you may change your browser settings accordingly. However, disabling certain mandatory cookies may affect the proper functioning of some parts of the website.

### WHAT ARE COOKIES

Cookies are small text files stored on your computer or mobile device through your browser when you visit a website. These files help websites maintain session continuity, improve security and ensure that pages function properly during your visit.

Cookies do not directly identify individuals on their own. However, in certain cases, they may become associated with personal data when combined with other technical information. While Turkish personal data protection legislation is not identical to the European Union GDPR framework, both regulations are based on broadly similar principles regarding transparency, data security and lawful processing.

### TYPES OF COOKIES USED

Cookies used on the KLINGER Turkey website are mainly technical, security, performance and analytics-oriented cookies.

#### **Mandatory Cookies**

These cookies are technically necessary for the operation of the website. They enable essential functions such as session management, security verification and page navigation. Without these cookies, the website may not function properly.

#### **Analytics and Measurement Cookies**

The website may use analytics cookies for purposes such as measuring visitor traffic, monitoring page performance, improving user experience and identifying technical issues. In this context, services such as Google Analytics, Google Tag Manager, Google Ads services and similar analytics infrastructures may be used.

Through these cookies, the following technical data may be processed:

- \* Page view information
- \* Session duration
- \* Traffic sources
- \* Click and navigation activities
- \* Technical performance data

#### User Behaviour and Technical Analysis Tools

The website may use Microsoft Clarity and similar behavioural analytics tools for purposes such as improving user experience, analysing page interactions and detecting technical problems.

Within this scope, the following technical interaction data may be processed:

- Cursor movements
- Scroll activities
- Page interactions
- Session recordings
- Heatmap and similar technical analysis records

Such data is mainly processed for technical analysis and website optimisation purposes.

#### **Third-Party Technical Cookies**

Certain infrastructure and embedded services used on the website may generate cookies belonging to third-party service providers, including but not limited to:

- \* google.com
- \* google-analytics.com
- \* googletagmanager.com
- \* doubleclick.net
- \* Microsoft Clarity services
- \* microsoft.com
- \* youtube.com

These services may be used for analytics, technical infrastructure management, performance measurement, embedded media display and advertising conversion measurement purposes.

#### **LEGAL BASIS OF COOKIE PROCESSING**

Pursuant to Article 5/2-f of the Turkish Personal Data Protection Law No. 6698 (“KVKK”), personal data may be processed where processing is necessary for the legitimate interests of the data controller, provided that such processing does not violate the fundamental rights and freedoms of the relevant person.

In addition, certain analytics, advertising and third-party cookies may require explicit consent under applicable legislation. Therefore, cookie management and preference mechanisms implemented on the website should also be considered.

Furthermore, certain traffic and access logs may be retained in accordance with Law No. 5651 and related secondary legislation.

## **MANAGING COOKIE PREFERENCES**

You may delete, block or disable cookies through your browser settings at any time. However, disabling certain cookies may prevent parts of the website from functioning properly.

## **RIGHTS REGARDING PERSONAL DATA**

Under Article 11 of the KVKK, data subjects have the right to:

- \* Learn whether their personal data is processed
- \* Request information if their personal data has been processed
- \* Learn the purpose of processing and whether it is used accordingly
- \* Learn the third parties to whom personal data is transferred
- \* Request correction of incomplete or inaccurate data
- \* Request deletion or destruction of personal data
- \* Request compensation in case of unlawful processing causing damage

## **CONTACT**

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## **FINAL NOTE**

This Cookie Policy may be updated in line with legal developments, decisions of the Turkish Personal Data Protection Authority, technical infrastructure changes and updates made to the website.

For further information, please also review the KLINGER Turkey Privacy Notice.