

# **COOKIE POLICY**

## **KLINGER TURKEY ESNEK BAGLANTIELEMANLAR TICARET VE SANAYIA.S.**

KLINGER Turkey Esnek Baglanti Elemanlari Ticaret ve Sanayi A.S. (hereinafter referred to as "KLINGER Turkey") makes limited use of cookies and similar technologies in order to provide website visitors with a secure, stable, and technically smooth browsing experience.

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

It should be expressly stated that KLINGER Turkey does not aim to carry out unnecessary data collection or data processing activities that go beyond user privacy through its website. However, certain technical data may be processed within the scope of analytics, performance, and digital infrastructure services used on the website.

If you prefer not to use cookies, you may make the necessary adjustments through your browser settings. However, if essential cookies are blocked, certain sections of the website may not function as expected.

### **WHAT IS A COOKIE**

Cookies are small text files saved to your computer or mobile device via your browser when you visit a website. Through these files, the site can, for example, remember your session, prevent interruptions when navigating between pages, and perform basic security checks.

Cookies are not data that directly identify you on their own; however, in some cases they may acquire the nature of personal data when combined with other technical data.

### **TYPES OF COOKIES USED**

The cookies used on the KLINGER Turkey website are primarily for technical, security, performance, and analytics purposes.

#### **Essential Cookies**

These cookies are technically necessary for the website to function. They enable session management, security verifications, and the execution of basic site functions. Without these cookies, the website may not function properly.

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

Analytics cookies may be used on the website for the purpose of analyzing visit traffic, page performance, user experience, and technical errors. In this context, services such as Google Analytics, Google Tag Manager, Google Ads, and similar analytics infrastructures may be used.

Through these cookies, the following data may be processed:

- Page view information
- Session duration
- Traffic sources
- Click and navigation movements

- Technical performance data

### **User Behavior and Technical Analysis Tools**

Microsoft Clarity and similar behavioral analysis tools may be used on the website for the purposes of improving user experience, identifying technical issues, and analyzing page interactions.

In this context, the following data may be processed:

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

This data is primarily used for technical analysis and user experience improvement purposes.

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

Due to certain infrastructures and services used on the website, cookies from the following service providers may be generated:

- google.com
- google-analytics.com
- googletagmanager.com
- doubleclick.net
- clarity.ms
- microsoft.com
- youtube.com

These services may be used for analytics, performance measurement, digital infrastructure management, video content display, and advertising conversion measurement.

### **LEGAL BASIS FOR COOKIES**

Pursuant to Article 5/2-f of the Law on Protection of Personal Data No. 6698, explicit consent may not be required when data processing is mandatory for the legitimate interests of the data controller.

In addition, explicit consent may be required under applicable legislation for certain analytics, advertising, measurement, and third-party cookies. For this reason, the cookie management system and preference mechanisms used on the website should be taken into account.

Furthermore, there is an obligation to retain certain traffic and access logs under Law No. 5651 and related legislation.

### **MANAGING COOKIE PREFERENCES**

If you wish, you may delete, block, or disable certain types of cookies through your browser's settings. However, in such cases, some sections of the website may not function as expected.

## **RIGHTS REGARDING PERSONAL DATA**

Pursuant to Article 11 of the PDPL, data subjects have the right to:

- Learn whether their personal data has been processed,
- Request information if it has been processed,
- Learn the purpose of processing,
- Know the third parties to whom data has been transferred,
- Request the correction of incomplete or inaccurately processed data,
- Request deletion or destruction of their data,
- Claim compensation for damages arising from unlawful processing.

## **CONTACT**

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## **FINAL NOTE**

This Cookie Policy may be revised in line with changes in legislation, decisions of the Personal Data Protection Board, changes in technical infrastructure, and updates to website applications.