

## PRIVACY NOTICE

### KLINGER TURKEY ESNEK BAĞLANTI ELEMANLARI TİC. VE SAN. A.Ş.

#### Website:

<https://klingerturkey.com/>

Version: 2.2

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This Privacy Notice has been prepared by KLINGER Turkey Esnek Bağlantı Elemanları Tic. ve San. A.Ş. ("KLINGER Turkey") within the scope of the Turkish Personal Data Protection Law No. 6698 ("KVKK"), which entered into force in 2016.

The purpose of this Privacy Notice is to inform visitors, customers, business partners and other relevant persons regarding the processing of personal data through the KLINGER Turkey website and related digital services.

Although the Turkish Personal Data Protection Law is not identical to the European Union General Data Protection Regulation ("GDPR"), both frameworks are based on broadly similar principles regarding transparency, lawful processing, proportionality, data security and data minimization.

KLINGER Turkey aims to act in accordance with applicable Turkish legislation, current decisions of the Turkish Personal Data Protection Authority and up-to-date data security practices while maintaining a transparent and balanced approach to personal data processing activities.

#### 1. DATA CONTROLLER

KLINGER Turkey Esnek Bağlantı Elemanları Tic. Ve San. A.Ş. acts as the data controller within the scope of the KVKK regarding the personal data processed through its website and related communication channels.

#### 2. CATEGORIES OF PERSONAL DATA PROCESSED

The following categories of personal data may be processed through the website:

- \* IP address information
- \* Cookie records
- \* Device and browser technical information
- \* Session and traffic records
- \* Website usage and interaction records
- \* Click, navigation and page interaction information
- \* Technical log and performance records
- \* Referrer / source URL information
- \* Communication form information such as name, surname, phone number and e-mail address
- \* User behavior and technical interaction records including scroll activity, cursor movements, session recordings and heatmap analysis data

### **3. PURPOSES OF PROCESSING PERSONAL DATA**

Personal data may be processed for the following purposes:

- \* Ensuring website security and system integrity
- \* Managing website access and technical infrastructure
- \* Monitoring website performance and traffic
- \* Improving user experience and website functionality
- \* Analyzing website usage statistics and visitor interactions
- \* Detecting technical problems and performance issues
- \* Managing communication activities
- \* Responding to requests, questions and complaints
- \* Conducting digital communication and advertising activities
- \* Measuring advertising and campaign performance
- \* Fulfilling legal obligations arising from applicable legislation
- \* Maintaining traffic and access logs pursuant to Law No. 5651
- \* Protecting the legitimate interests of KLINGER Turkey provided that fundamental rights and freedoms are not violated

### **4. LEGAL GROUNDS FOR PROCESSING**

Personal data may be processed pursuant to Articles 5 and 6 of the KVKK based on the following legal grounds:

- Processing is necessary for the legitimate interests of the data controller
- Processing is necessary for compliance with legal obligations
- Processing is directly related to the establishment or performance of a contract
- Explicit consent where required under applicable legislation

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

Personal data may be transferred, in accordance with Articles 8 and 9 of the KVKK, to domestic and/or international service providers, infrastructure providers, analytics providers, cloud systems, digital communication and advertising service providers where necessary for the operation, security and technical management of the website and related services.

Certain technical data may be processed through third-party analytics, hosting, infrastructure and communication services located outside Türkiye where required for the operation and security of the website.

International data transfer processes are carried out in accordance with applicable KVKK regulations and appropriate safeguard mechanisms.

### **6. DATA RETENTION**

Personal data is retained for the period required by applicable legislation, the purpose of processing and company retention policies. At the end of the applicable retention period, personal data may be deleted, destroyed or anonymized in accordance with the KVKK and related legislation.

## **7. RIGHTS OF DATA SUBJECTS**

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

- \* Learn whether their personal data is processed
- \* Request information regarding processed personal data
- \* Learn the purposes of processing and whether data 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
- \* Object to adverse outcomes resulting exclusively from automated processing
- \* Withdraw explicit consent where processing is based on consent
- \* Request compensation for damages arising from unlawful processing

## **8. CONTACT**

KLINGER Turkey Esnek Bağlantı Elemanları Tic. ve San. A.Ş.

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## **9. FINAL NOTE**

This Privacy Notice may be updated in line with legal developments, decisions of the Turkish Personal Data Protection Authority, technical infrastructure changes and company practices.

For further information regarding cookies and similar technologies used on the website, please also review the KLINGER Turkey Cookie Policy