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Document Name	Personal Data Protection and Privacy Notice		

Etisan Proje A.Ş. processes personal data in connection with the services it provides to its client institutions and the users affiliated with those institutions. Such processing activities are carried out in accordance with **Turkish Personal Data Protection Law No. 6698 ("KVKK")** and other applicable legislation.

1. Data Controller

Pursuant to Turkish Personal Data Protection Law No. 6698 ("KVKK"), **Etisan Proje A.Ş.** acts as the **data controller** in respect of the processing of your personal data.

2. Categories of Personal Data Processed

In connection with the services provided by our Company, the following categories of personal data may be processed:

- **Identity Data:** First name, surname and Turkish Republic identification number
- **Contact Data:** Telephone number and email address
- **User and System Data:** Card ID, user ID and student/personnel number
- **Financial Data:** Transaction approval information received through the relevant banking systems for the purpose of accessing cafeteria services
- **Access and Location Data:** Turnstile entry and exit records processed for reporting purposes
- **Transaction Security Data:** IP addresses, user activity records and system access logs processed for the purposes of ensuring system security and carrying out audit activities
- **Usage Data:** System usage activity and reporting data
- **Audio Data:** Recordings of telephone conversations
- **Written Data:** Transcripts generated from telephone conversations

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3. Purposes of Processing Personal Data

Your personal data may be processed for the following purposes:

- Managing access control and authorisation processes in order to provide cafeteria services and enable users to benefit from such services
- Managing turnstile access and identity verification processes
- Recording and reporting user transactions
- Ensuring system security and preventing misuse
- Managing customer support and request-handling processes
- Improving service quality and carrying out analytical activities
- Complying with legal obligations arising under applicable legislation
- Recording telephone conversations made through telephone numbers operated by our Company for quality assurance purposes, converting such audio recordings into written transcripts without including identifying information, and storing those transcripts in a cloud environment

4. Legal Bases for Processing Personal Data

Your personal data is processed on the basis of the legal grounds set out in Articles 5 and 6 of the KVKK, including:

- Where processing is directly related to the establishment or performance of a contract
- Where processing is necessary for the data controller to comply with its legal obligations
- Where processing is necessary for the legitimate interests of the data controller, provided that such processing does not adversely affect the fundamental rights and freedoms of the data subject
- Where **explicit consent** has been obtained, where required

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5. Methods of Collecting Personal Data

Your personal data may be collected by automated or partially automated means through:

- POS terminals
- Turnstile systems
- Kiosk devices
- Web and mobile applications
- Integrated systems of client institutions
- Telephone conversations conducted through telephone numbers operated by our Company

6. Transfer of Personal Data

Your personal data may be transferred to the following recipients in accordance with Articles 8 and 9 of the KVKK:

- Universities and other institutions to which services are provided
- Authorised public authorities and institutions
- Companies and individuals contracted by our Company for the provision of the relevant call services
- Cloud service providers used for data storage purposes

Where necessary, your personal data may be processed on servers located in Türkiye as part of the service infrastructure.

7. Data Security

Our Company implements appropriate technical and organisational measures to safeguard personal data, including:

- Role-based authorisation and access controls
- Data encryption and secure data transmission

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- Logging and system monitoring mechanisms
- Network security and firewall measures
- Regular security testing and controls

8. Retention Periods

Personal data is retained for the following periods:

- **Financial records:** For the period prescribed by applicable legislation
- **System logs:** For a limited period determined on the basis of operational requirements
- **Audio recordings and written transcripts:** For a period of **10 years**. Upon expiry of the applicable retention period, such records are deleted, destroyed or anonymised. Written transcripts are, in all cases, retained in anonymised form.
- **User data:** For the duration of the relevant service relationship. Upon termination of that relationship, the data is deleted, destroyed or anonymised.

9. Rights of Data Subjects

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

- Find out whether their personal data is being processed
- Request information regarding the processing of their personal data and request the correction of inaccurate or incomplete personal data
- Request the deletion or destruction of their personal data
- Object to the processing of their personal data

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10. How to Exercise Your Rights

Data subjects may submit their requests through the following channels:

Email: talep@etisan.com

Written application: Etisan Proje A.Ş.

Requests will be processed and concluded within **30 days at the latest**, in accordance with the KVKK.

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