

PRIVACY POLICY

FOREWORD

Within the scope of the Law on the Protection of Personal Data, we as DIŞ PATENT MARKA TESCİL VE DANIŞMANLIK HİZMETLERİ LTD. ŞTİ. attach importance to the protection of your personal data and/or your sensitive personal data. We are sensitive about keeping all your personal data and/or your sensitive personal data transmitted to our company through various means. In this regard, in order to comply with the provisions of the T.R. Constitution and other legislation, in particular to the Law No. 6698 on the Protection of Personal Data, we as DIŞ PATENT MARKA TESCİL VE DANIŞMANLIK HİZMETLERİ LTD. ŞTİ. have taken the necessary technical and administrative measures. We share our Privacy Policy which has been put into effect within DIŞ PATENT MARKA TESCİL VE DANIŞMANLIK HİZMETLERİ LTD. ŞTİ, which is of particular importance for the protection of your personal data.

DIŞ PATENT MARKA TESCİL VE DANIŞMANLIK HİZMETLERİ LTD. ŞTİ.

1.DEFINITIONS

Data Controller	It refers to DIŞ PATENT MARKA TESCİL VE DANIŞMANLIK HİZMETLERİ LTD. ŞTİ. which determines the purposes and means of processing personal data and is responsible for establishing and managing the data recording system.
Data Owner- Person Concerned	It refers to the natural person whose personal data is processed.
Company	It refers to DIŞ PATENT MARKA TESCİL VE DANIŞMANLIK HİZMETLERİ LTD. ŞTİ. pursuant to this policy.
Law	It refers to the Law No. 6698 on the Protection of Personal Data.
Personal Data	It refers to any information relating to a natural person that makes the identity specific or identifiable.
Sensitive Personal Data	It refers to data related to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, costume and clothing, membership of associations, foundations or unions, health, sexual life, criminal convictions and security measures and genetic and biometric data of sensitive personal data of people.
Board	It refers to the Personal Data Protection Board.
Policy	It refers to this “Privacy Policy”.

Processing of Personal Data	It refers to any operation performed on data such as obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or blocking the usage of personal data in whole or in part by automatic or non-automatic means provided that it is a part of any data recording system.
-----------------------------	---

Explicit Consent	It refers to the consent, which is based on information and expressed with free will regarding a particular subject.
Destruction	It refers to making personal data inaccessible, irretrievable and reusable by anyone in any way.
Erasure	It refers to making personal data inaccessible and reusable by anyone in any way.
Anonymization	It refers to making personal data not to be associated with an identified or identifiable natural person in any way, even if it is matched with other data.
Annihilation	It refers to the erasure, destruction and anonymization of personal data.
Data	It refers to personal data and sensitive personal data jointly.

2. PURPOSE OF PRIVACY POLICY

Protecting personal data and complying with the law is our basic principle. Personal data and/or special quality personal data we receive from you in all our works as DIŞ PATENT MARKA TESCİL VE DANIŞMANLIK HİZMETLERİ LTD. ŞTİ. (Hereinafter referred to as “DIŞPATENT” or “Company”) are kept confidential and are not shared with the third parties. In this regard, our company has always been sensitive regarding the protection of personal data and/or sensitive personal data. Again, pursuant to the Law No. 6698 on the Protection of Personal Data (Hereinafter referred to as “Law” or “KVKK”), our in-company regulations have been re-made and technical and administrative measures have been taken. We as DIŞ PATENT MARKA TESCİL VE DANIŞMANLIK HİZMETLERİ LTD. ŞTİ. accept, declare and undertake to comply with the obligations imposed by the law in the ongoing process.

3. SCOPE OF PRIVACY POLICY

This Privacy Policy has been prepared in accordance with the Law No. 6698 on the Protection of Personal Data. Your personal data and/or your sensitive personal data are processed with your consent or within the scope of compliance with the Law. Your data in question is used with the purpose of;

- ✓ Ensuring company security,
- ✓ Being able to provide you with a complete service,
- ✓ Carrying out our commercial activities,
- ✓ Resolving your problems promptly,
- ✓ Increasing our quality.

Some personal data and/or sensitive personal data coming from you are depersonalized and anonymized by the procedures stipulated by the Law. The data used for statistical purposes are currently not included in the regulation of the Law and the scope of our policy. We as DISPATENT have the right to change this policy in order to protect personal data within the scope of compliance with the Law.

The privacy policy aims to protect the data obtained by any means of natural and legal persons, customers, employees and all other persons with whom DIŞPATENT is a solution partner. In this regard, it includes various arrangements in order to achieve the intended goal.

4. BASIC PRINCIPLES REGARDING THE PROCESSING PERSONAL DATA AND/OR SENSITIVE PERSONAL DATA

Our basic principles regarding the processing of personal data and/or sensitive personal data are as follows. In this regard, these principles will apply to the data that DIŞPATENT processes based on the explicit consent or within the scope of compliance with the Law.

Compliance with the Law: DIŞPATENT questions the source and legality of the personal data and/or sensitive personal data received from natural and legal persons and collected through various means. In this context, it is important for DIŞPATENT to obtain the data in accordance with the law.

Compliance with Good Faith: DIŞPATENT questions the source of the personal data and/or sensitive personal data received from natural and legal persons and collected through various means. In this context, it is important for DIŞPATENT to obtain the data in accordance with good faith.

Being relevant, limited and proportionate to the purposes for which they are processed: DIŞPATENT uses the personal data and/or sensitive personal data obtained through various means in accordance with the purpose for which they are processed, limited for the purpose of processing, in a measured manner and to the extent required by the performance of the service.

Accuracy of Personal Data and/or Sensitive Personal Data: DIŞPATENT attaches importance to the fact that the personal data and/or sensitive personal data received from natural and legal persons and collected through various means do not contain false information and are accurate. However, DIŞPATENT is not obliged to investigate the accuracy of the personal data and/or sensitive personal data declared by its customers or natural and legal persons with whom it is in contact. Because this is not possible legally and in line with our working principles.

Being Up-To-Date Where Necessary: If there is a change in the personal data and/or sensitive personal data obtained in various ways, DIŞPATENT attaches importance to informing the company of the said change and updating the data if it is communicated.

Being Processed for Specified and Legitimate Purposes: DIŞPATENT processes the personal data and/or sensitive personal data without the explicit consent of the data owner or within the framework of exceptions stipulated by law. The purpose of processing each data is specific and personal data processing is not carried out for any illegitimate purpose.

Being Stored for the Period Laid Down by Relevant Legislation and/or Required for the Purpose for which the Personal Data Are Processed: DIŞPATENT stores the personal data and/or sensitive personal data it obtains for the periods required by the relevant laws and/or for the purpose for which they are processed. When the said purposes are over, it anonymizes, destructs or erases the data.

5. ERASURE, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

Your personal data and/or sensitive personal data will be erased, destroyed or anonymized when the statute of limitations and storage periods stipulated in the Law expires, the judicial processes are completed or other relevant requirements are terminated. The erasure, destruction and anonymization processes are carried out at the request of the relevant data owner or by DIŞPATENT ex officio (spontaneously).

6. PRINCIPLE OF PARSIMONY

The principle of parsimony is also known as the principle of maximum saving. Personal data and/or sensitive personal data obtained through various means are transferred to our company's system. In accordance with the said policy, the data is processed into the system as much as necessary. The data to be collected by DIŞPATENT are determined in accordance with the purpose and vary. In this regard, data are collected in accordance with the purpose and data that are not parallel to the purpose are not collected. Redundant data other than its purpose are not recorded in the company system, they are erased, destructed or anonymized. However, these data can be used for statistical purposes.

7. DATA PRIVACY AND SECURITY

We as DIŞPATENT attach importance to the privacy of your personal data and/or sensitive personal data. In this regard, your personal data and/or sensitive personal data transmitted to our Company by any means are confidential. DIŞPATENT respects the confidentiality of the said data at every stage of its commercial activity. In this context, Full compliance with this company privacy policy is ensured.

Necessary technical and administrative measures are taken to ensure that personal data and/or sensitive personal data collected through various means do not fall into the hands of unauthorized persons, that the rights of the data owner are not harmed, that they are not victims, and that the data is protected. In addition, data protection is requested from third parties with whom we share personal data and/or sensitive personal data in accordance with the law, where necessary. Again, our software programs are updated and constantly renewed. In order to provide a high level of protection, technological requirements are fulfilled and compliance with standards is ensured.

8. DATA UP-TO-DATENESS

The principle of up-to-dateness is essential within DIŞPATENT. Because personal data obtained through various ways and/or special quality personal data can be updated where necessary or upon request. Necessary measures regarding the update are also taken by DIŞPATENT.

9. ACCURACY OF DATA

The principle of accuracy of declared personal data and/or sensitive personal data has been adopted by DIŞPATENT. DIŞPATENT is not obliged to investigate the accuracy of personal data and/or sensitive personal data declared by its customers or natural and legal persons with whom it is in contact. Because this is not possible legally and in line with our working principles. In this regard, transactions are carried out on the basis that the declared data is correct.

10. PURPOSE OF PROCESSING THE PERSONAL DATA AND/OR SENSITIVE PERSONAL DATA

Processing the personal data and/or sensitive personal data is carried out in line with the purposes in the Clarification Texts of DIŞPATENT. The aforementioned Clarification Texts may vary according to the personal data and/or sensitive personal data processed. In parallel to the difference in the Clarification Texts, the purposes of processing personal data and/or sensitive personal data may also vary.

11. COLLECTION AND PROCESSING OF PERSONAL DATA AND/OR SENSITIVE PERSONAL DATA WITHIN THE CONTRACT RELATIONSHIP

If a contractual relationship is established with customers or prospective customers, personal data collected pursuant to the contract may be processed by DIŞPATENT without obtaining explicit consent. In cases where sensitive personal data is processed, data can be processed based on the express consent or legal reasons within the scope of Article 6 of the Law. The said data is used within the framework of the performance of the goods and/or services, the execution of the contract, the execution of the commercial activity. This data can be updated at any time by contacting the customers..

12. PERSONAL DATA AND/OR SENSITIVE PERSONAL DATA PROCESSED THROUGH AUTOMATIC SYSTEMS

Data acquired from the information obtained without the explicit consent of individuals through automated systems cannot be used against individuals. DIŞPATENT complies with the provisions of the relevant legislation in personal data and/or sensitive personal data processed through automatic systems.

13. PERSONAL DATA AND/OR SENSITIVE PERSONAL DATA OF DIŞPATENT'S EMPLOYEES

- **PROCESSING WITHIN THE FRAME OF LEGAL OBLIGATIONS:** Personal data belonging to the employees may be processed by DIŞPATENT without the express consent of the data controller in order to expressly contain a provision in the Law concerned on data processing or to fulfill the legal obligation of the data controller.
- **PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH THE EMPLOYMENT CONTRACT AND WORKING RELATIONSHIP:** The personal data of the employees can be processed without the express consent of the employees, within the framework of proportionality, as much as necessary to ensure the business relationship between the company and the employees. DIŞPATENT undertakes to protect and confidentiality of employee data under all circumstances and to take the necessary measures in this regard.
- **PROCESSING OF SENSITIVE PERSONAL DATA OF EMPLOYEES:** Pursuant to the Law No. 6698 on the Protection of Personal Data, for the processing of sensitive personal data, the explicit consent of the person whose data will be processed and additionally the necessary measures foreseen by the Board must be taken. DIŞPATENT, in frame of compliance with the Law No. 6698 and the principles of the Board, takes both the explicit consent of the person concerned and the necessary measures determined by the Board when processing the sensitive personal data. However, sensitive personal data may be processed in exceptional circumstances stipulated in the Law, without the explicit consent of the person concerned, provided that it is limited and measured.
- **PERSONAL DATA PROCESSED THROUGH AUTOMATED SYSTEMS:** Some personal data of employees can be processed in the automated systems. Said data are used in the performance evaluation of employees, keeping statistical data, promotions and scoring for the company. Employees have the right to object to the unfavorable results associated with them. The objection must be made in accordance with internal company rules and procedures. The objection in question is evaluated within the company.

➤ **PROCESSING PERSONAL DATA FOR THE BENEFIT OF EMPLOYEES:**

Personal data of employees can be processed by DIŞPATENT without obtaining explicit consent within the framework of the relationship provided by the employment contract for transactions related to the interests of the employee. Again, in disputes regarding the business relationship with DIŞPATENT, the Company may process the personal data of the employees.

➤ **TELECOMMUNICATION, INTERNET AND COMMUNICATION WITHIN COMPANY:**

In order to ensure the performance of the work more easily, DIŞPATENT can allocate computers, telephones, cars, applications, software and e-mail to the employees within the company. DIŞPATENT can control and inspect the personal data on the vehicles it has allocated within the scope of its obligation to inform.

The employee cannot use the means allocated to him/her for private purposes. It is obligatory to use it only for the purpose of ensuring the performance of the work. Again, the employee accepts, declares and undertakes that from the beginning of the working relationship with DIŞPATENT, the means allocated will not contain any data or information other than the work and the necessity of the work.

14. TRANSFER OF PERSONAL DATA AND/OR SENSITIVE PERSONAL DATA IN THE COUNTRY OR ABROAD

DIŞPATENT is able to transfer data in the country and abroad in accordance with the conditions stipulated in the Law on the Protection of Personal Data and within the frame of the principles determined by the Board, within the scope of compliance with the law or with the express consent of the person concerned. DIŞPATENT acts in accordance with Articles 8 and 9 of Law No. 6698 when transferring personal data and/or sensitive personal data.

15. AUDITING AND PROCESS SECURITY

Necessary technical and administrative measures are taken to ensure that personal data and/or sensitive personal data collected through various means do not fall into the hands of unauthorized persons, that the rights of the data owner are not harmed, that they are not

victims, and that the data is protected. In addition, data protection is requested from companies with which we share personal data and/or sensitive personal data within the frame of compliance with the law. Again, our software programs are updated, constantly renewed and developed. In order to provide a high level of protection, all technological requirements are fulfilled and compliance with standards is ensured. In parallel with all these, DIŞPATENT carries out all internal and external audits necessary for the protection of personal data and/or sensitive personal data.

16. NOTICE OF DATA BREACH

In the event of any data breach, DIŞPATENT takes immediate action to remedy the breaches reported to it. It takes the necessary measures to minimize the harm of the person concerned. You can apply for notification of breach according to the procedures specified on our company's website. In addition, if personal data and/or sensitive personal data are obtained from outside by unauthorized third parties, the company notifies the Personal Data Protection Board directly.

17. RIGHTS OF THE DATA OWNER AS PERSON CONCERNED REQUESTING INFORMATION

The rights of the data owner are stipulated in Article 11 of the Law No. 6698 on the Protection of Personal Data. DIŞPATENT accepts that, pursuant to the law, the data owner has the right to be informed before the data is processed and to obtain his explicit consent when necessary, to request information about the data of the data owner, to update, to erase, to destruct and to anonymize after the data is processed.

The persons concerned have the following rights from the link concerned on the web address <https://dispatent.com.tr/> through the "Information Request Form pursuant to the Law No. 6698 on Protection of Personal Data";

- a) Learning whether the personal data is processed,
- b) If the personal data has been processed, requesting information about it,
- c) Learning the purpose of processing the personal data and whether they are used in accordance with its purpose,
- ç) Knowing the third parties to whom personal data is transferred, in the country or abroad,

- d) Requesting the correction of personal data in case of incomplete or incorrect processing,
- e) Requesting the erasure or destruction of the personal data pursuant to the conditions stipulated in Article 7 of the Law titled “Erasure, destruction or anonymization of the personal data”,
- f) Requesting the notification to third parties to whom personal data is transferred about the information that incomplete or incorrectly processed data has been corrected or that the data has been erased or destroyed upon the request of the person concerned,
- g) Objecting to the emergence of a result against the person himself/herself by analyzing the processed data exclusively through automated systems,
- h) Requesting compensation for the damage in case of loss due to unlawful processing of personal data.

Information requests made on behalf of someone else will not be answered by the company. If it is determined by DISPATENT that the application made on behalf of someone else in the information request is made; DIŞPATENT reserves the right to sue and demand any kind of claim. It will be answered as soon as possible and within thirty days from the date the person concerned reaches DIŞPATENT. If DIŞPATENT deems necessary, it may request other information and documents from the applicant.

DIŞ PATENT MARKA TESCİL VE DANIŞMANLIK HİZMETLERİ LTD. ŞTİ.