

# PERSONAL DATA PROTECTION AND PROCESSING POLICY

## 1. INTRODUCTION

Pursuant to Law No. 6698 on the Protection of Personal Data, **İdeart Reklamcılık Tanıtım ve Organizasyon Hizmetleri San. ve Tic. Ltd. Şti.** (“İDEART”), as the “data controller,” pays great attention to the protection of personal data belonging to its customers, employees, and other real persons with whom it has relations, and to ensuring compliance with all applicable legislation in this regard.

### *1.1. Purpose and Scope*

This **Personal Data Protection and Processing Policy** (“Policy”) aims to ensure transparency regarding the systems adopted for processing and protecting personal data in accordance with the Constitution of the Republic of Turkey, international conventions, Law No. 6698 on the Protection of Personal Data (“Law” or “KVKK”), and other relevant regulations.

The principles and provisions herein apply to all kinds of operations performed on personal data that directly or indirectly identify a natural person—such as obtaining, recording, storing, preserving, modifying, rearranging, disclosing, transferring, taking over, making accessible, classifying, or preventing the use of such data—whether automated or non-automated, provided they form part of a data recording system.

All İDEART executives, employees, and third parties with authorized access to personal data are bound by this Policy. İDEART takes all necessary administrative and technical measures to ensure lawful protection and processing of personal data and performs or commissions the required audits within this scope.

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## 2. DEFINITIONS

- **Explicit consent:** Consent that is informed, specific, and freely given.
- **Data subject:** The real person whose personal data is processed.
- **Law:** Law No. 6698 on the Protection of Personal Data, published in the Official Gazette dated April 7, 2016.
- **Personal data:** Any information relating to an identified or identifiable natural person.
- **Processing of personal data:** Any operation performed on personal data, such as collection, recording, storage, alteration, disclosure, transfer, or prevention of use, whether automated or not.
- **Data controller:** The person or legal entity determining the purposes and means of processing and responsible for the establishment and management of the data recording system.
- **Data processor:** A person or legal entity that processes personal data on behalf of the data controller.
- **Data recording system:** The system in which personal data is processed according to specific criteria.

- **Recording medium:** Any environment where personal data is processed automatically or manually.
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### 3. PERSONAL DATA PROCESSING PRINCIPLES

IDEART processes personal data in accordance with Article 20 of the Constitution and Article 4 of the Law, observing the principles of:

- lawfulness and fairness,
  - accuracy and being kept up to date when necessary,
  - processing for specific, explicit, and legitimate purposes,
  - relevance, limitation, and proportionality to the purpose, and
  - retention only for the duration required by law or the purpose of processing.
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#### 3.1. CATEGORIES OF PERSONAL DATA

IDEART may process the following categories of personal data under Articles 5 and 6 of the Law:

- Identity (e.g., name, surname, ID number, marital status, date of birth)
  - Contact (e.g., address, e-mail, phone number)
  - Location
  - Personnel (e.g., payroll, employment records, disciplinary data)
  - Legal transaction data
  - Customer transaction data (e.g., invoices, orders, requests)
  - Physical security data (e.g., entry-exit logs, camera footage)
  - Transaction security (e.g., IP address, passwords)
  - Risk management, finance, professional experience, marketing, visual/audio records, and other related data.
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#### 3.2. CONDITIONS FOR PROCESSING PERSONAL DATA

Personal data may be processed with the explicit consent of the data subject or, without consent, if one of the following applies:

- Required by law,
- Necessary to protect life or bodily integrity where consent cannot be obtained,
- Necessary for the performance of a contract,
- Necessary to fulfill a legal obligation,
- Data made public by the data subject,
- Necessary for the establishment, exercise, or protection of a right,
- Necessary for the legitimate interests of the data controller, provided it does not harm the data subject's fundamental rights and freedoms.

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

Personal data may be processed for legitimate purposes such as:

- Planning and management of human resources processes,
  - Fulfillment of legal and contractual obligations,
  - Payroll and performance management, occupational health and safety,
  - Strategic planning and corporate management,
  - Finance, accounting, and auditing,
  - Logistics, sales, production, and operations,
  - Legal proceedings, communication, and risk management,
  - Customer relationship and satisfaction processes,
  - Marketing and analytics,
  - Security and visitor management,
  - Compliance with requests of authorized institutions.
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### **3.4. RETENTION PERIOD**

If the law specifies a retention period, personal data are stored for that duration.

If not, data are retained for as long as necessary for processing purposes and then securely deleted, destroyed, or anonymized.

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## **4. TRANSFER OF PERSONAL DATA**

Personal data may be transferred to third parties in compliance with Articles 8 and 9 of the Law, taking all necessary security measures.

Such third parties may include business partners, suppliers, consultants, auditors, legal representatives, certified public accountants, and legally authorized public institutions.

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## **5. RIGHTS OF THE DATA SUBJECT**

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

- Learn whether their personal data are processed,
- Request information about such processing,
- Learn the purpose of processing and whether data are used appropriately,
- Learn the third parties to whom data are transferred domestically or abroad,
- Request correction, deletion, or destruction of personal data,
- Object to results derived from automated processing,
- Request compensation for damages due to unlawful processing.

Requests may be submitted to İDEART in accordance with the “Communiqué on Application Procedures and Principles to the Data Controller.” Applications will be answered free of charge within 30 days, except where costs apply as determined by the Personal Data Protection Board.

This **Policy** enters into force on the date it is published on the website **ideart.com.tr**.