

## **Kolay IK Personal Data Protection and Processing User Privacy Notice**

This Personal Data Protection and Processing User Privacy Notice (“**Notice**”) regards the processing of personal data of employees of companies executing Human Resources and Personnel Management Program User Agreement (“**Company**”) who shall be benefiting from Human Resources and Personnel Management System (“**Platform**”) provided via www.kolayik.com web site (“**Site**”) belonging to Kolay Yazılım A.Ş. (“**Kolay IK**”) (“**User**”) in accordance with the Personal Data Protection Law No. 6698 (“**Law**”).

### **For Which Purposes Personal Data are Processed?**

In accordance with the conditions for processing personal data specified under Article 5 of the Law, Kolay IK processes personal data provided by the User for the purposes of enhancing Kolay IK products and services, communicating with the Company regarding the use of the Platform and conducting reporting and business development activities (“**Purposes**”).

If the User provides his/her explicit consent, User personal data shall be processed for the purposes of direct marketing and sending commercial electronic messages to provided contact address of the User.

### **From Which Channels Personal Data are Collected and Under Which Legal Grounds Personal Data are Processed?**

Personal data are collected in electronic media from the Company, via e-mail and Platform during the creation and use of the Platform by the User. User personal data are processed based on the legal ground of legitimate interest for the purposes of enhancing Kolay IK products and services, communicating with the Company regarding the use of the Platform and conducting reporting and business development activities. If the User provides his/her explicit consent, User personal data are processed based on such explicit consent for the

purposes of direct marketing and sending commercial electronic messages to provided contact address of the User.

### **To Whom Personal Data are Transferred?**

Kolay IK transfers User personal data to third party suppliers, legally authorized public institutions and legally authorized private persons within the scope of the conditions for processing personal data specified under Article 5 of the Law and in accordance with the conditions for transferring personal data specified under the Article 8 of the Law and within the framework of the Purposes. If the User provides his/her explicit consent, User personal data are shared with suppliers and business partners for the purposes of direct marketing and sending commercial electronic messages to provided contact address of the User.

### **Data Subject's Rights**

User may apply to Kolay IK and use his/her following rights within the scope of the Article 11 of the Law;

- To learn whether your personal data are being processed,
- To request information if your personal data have been processed,
- To learn the purpose of the processing of your personal data and whether they have been used accordingly,
- To learn which third parties domestic or abroad your personal data has been transferred to,
- To request rectification in case your personal data has been processed incompletely or inaccurately and to demand the operations in this regard be reported to third parties your personal data has been transferred to,
- To demand the erasure or destruction of your personal data in case the reasons necessitating the processing have disappeared even though it was processed in accordance with the Law and other relevant provisions

and to demand the operations in this regard be reported to third parties your personal data has been transferred to,

- To object the occurrence of any consequence that is to your detriment by means of analysis of personal data solely through automated systems,
- To demand compensation for the damages that you have suffered as a result of unlawful processing of your personal data.

User may present his/her application stated above in written to Nef 09 Plaza A Blok Kat 11 Sultan Selim Mh. Lalegül Sk. Kağıthane 34415 İstanbul or via other methods foreseen by the applicable legislation. Kolay IK shall present its response as soon as possible, within thirty (30) days at the latest via the relevant method; in written or via digital media. In principle, processes of application review are free of charge. However, if the process requires additional costs, a fee may be demanded according to the tariff determined by the Personal Data Protection Board in accordance with the Article 13 of the Law.