

ORDULU TECHNOLOGY INC. POLICY ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

Within the scope of Law No. 6698 on the Protection of Personal Data ("KVKK") and other relevant legislation, as Data Controller, ORDULU TECHNOLOGY INC. located at MUSTAFA KEMAL MAHALLESİ DÜMLUPINAR BULVAR NO: 274/7/214 ÇANKAYA ANKARA. (Mersis No: 0645 0588 0210 0001) (Kep address: ordulubilgi@hs01.kep.tr) ("ORDULU" or "Company") as "Data Controller" as defined in the Law, we process personal data within the framework described below:

1. PUPRPOSE OF THE POLICY

The main purpose of this Policy is to make explanations about the systems for the processing and protection of personal data in accordance with the law and the purpose of the Law, and to inform the persons whose personal data are processed by ORDULU in this context. In this way, it is aimed to ensure full compliance with the legislation in the processing and protection of personal data carried out by ORDULU and to protect all rights of personal data owners arising from the legislation on personal data

2. SCOPE OF THE POLICY AND PERSONAL DATA SUBJECTS

This Policy has been prepared for persons whose personal data are processed by ORDULU.

Shareholder from Ordu	Real persons who are shareholders
Shareholder, Officer, Employee of Ordu Business Partners	All real and legal persons (business partners, suppliers, etc.) with whom it has all kinds of business relations, including employees, shareholders and authorized persons.
Employee Candidate	People who have applied for a job to ORDULU in any way or who have submitted their CV information to ORDULU.
Intern	People whose information is received within the scope of the internship
Customer or Potential Customer Candidate from Ordu	Real persons who use, have used or request to use the products and services offered by ORDULU.
Visitor	Real persons who visit ORDULU campuses for any purpose.

3. PROCESSING AND TRANSFER OF PERSONAL DATA

3.1. General Principles for Processing Personal Data and Sensitive Personal Data

Personal Data is processed by ORDULU in accordance with the procedures and principles stipulated in the Law and this Policy. ORDULU acts in accordance with the principles listed in the Law when processing Personal Data.

3.2. Personal Data and Processing Conditions of Sensitive Personal Data

ORDULU processes Personal Data in accordance with the conditions specified in the Law. ORDULU takes the measures determined by the Personal Data Protection Authority

3.3. Conditions of Transfer of Personal Data

ORDULU acts in accordance with the conditions and principles stipulated in the Law regarding the transfer of Personal Data.

4. CATEGORIES OF PERSONAL DATA

Identification	Security of Process
Contact	Finances
Personnel File	Philosophical Beliefs, Religion, Sects and Other Beliefs
Customer Processing	Health Information
Security of Physical Space	Biometric Data

5. PURPOSES OF PROCESSING AND TRANSFERRING PERSONAL DATA

Execution of Information Security Processes

Execution of Employee Candidate / Intern / Student Selection and Placement Processes

Execution of Employee Candidate Application Processes

Execution of Employee Satisfaction and Loyalty Processes

Fulfillment of Obligations Arising from Employment Contract and Legislation for Employees

Execution of Fringe Benefits and Benefits Processes for Employees

Conducting Training Activities

Execution of Activities in Compliance with the Legislation

Execution of Finance and Accounting Affairs

Ensuring Physical Space Security

Planning Human Resources Processes

Execution of Occupational Health / Safety Activities

Execution of Goods / Service Procurement Processes
Execution of Goods / Service Sales Processes
Execution of Customer Relationship Management Processes
Execution of Activities for Customer Satisfaction
Execution of Performance Evaluation Processes
Ensuring the Security of Movable Property and Resources
Ensuring the Security of Data Controller Operations Creating
and Monitoring Visitor Records

6. PERSONS TO WHOM PERSONAL DATA WILL BE TRANSFERRED

Personal Data may be transferred by ORDULU to ORDULU Shareholders, Subsidiaries and Affiliates, Public Institutions and Organizations in accordance with the conditions and principles set forth in the Law.

7. METHODS OF COLLECTION OF PERSONAL DATA AND LEGAL GROUNDS

Personal Data is collected and processed by ORDULU through all kinds of verbal, written, electronic media and methods, mobile applications, in order to achieve the purposes set out in the Policy or in accordance with legal rights and responsibilities.

8. STORAGE PERIOD OF PERSONAL DATA

ORDULU retains Personal Data for the periods stipulated in the legal regulations or, in the absence of such a period, for the period it will determine in accordance with its activities. In case the period expires, these data shall be destroyed by ORDULU. The procedures and principles regarding the retention periods of Personal Data are set out in the Personal Data Retention and Destruction Policy.