

**CLARIFICATION
TEXT WITHIN
THE FRAMEWORK
OF THE PERSONAL
DATA PROTECTION
LAW**

As MB Tech Mühendislik Ve Danışmanlık Limited Şirketi, which is part of AKKA Group, (shall be referred to as “MB Tech” or “Company”), the data related to the customer, supplier, visitor and employee candidates may be processed by us. The Company takes the required technical and administrative measures within the frame of the related legal legislation, in order to provide the appropriate security level as the data controller, to process the personal data in compliance with the laws, to prevent illegal access to such data and to protect such personal data.

Within this frame, as the Company, we pay utmost attention to the security of your personal data. Based on this, we attach great importance to processing and protecting any and all types of personal data of the individuals submitted to us, in compliance with the Personal Data Protection Law no 6698 (“Law”). Within the scope of this clarification, we aim to keep you informed with respect to the processing of your personal data in compliance with the 10th article of the Law.

This Clarification Text is complementary to AKKA Group Privacy Policy and it aims to precise and cover personal data handled in accordance with the Law. As such, you may refer to AKKA Group Privacy Policy for processing of your personal data, irrespective of your country of residence. Furthermore, in cases where your personal data is transferred to other companies within AKKA Group, your personal data may be handled in accordance with the local legislation of such companies.

1. THE PURPOSES OF PROCESSING THE PERSONAL DATA

The names, surnames, contact information, financial information of the customers and the suppliers are processed for the purpose of establishing a commercial relation between the mentioned parties and the Company and for the performance of such commercial relation. Moreover, the mentioned data may also be processed for the performance of our legal obligations. If the visitors visit the website with the domain <https://www.akka-technologies.com/> (“Site”) and contact the Company, then the data of such visitors are processed so that the Company can return to them and the visitors can use the Site in an effective manner.

Since the servers of the Site are located in the European Union, AKKA Website Privacy Notice that can be found at <https://www.akka-technologies.com/privacy-policy/> is prepared in accordance with the General Data Protection Regulation 2016/679 (EU) and is also applicable for processing of your personal data, in addition to this Clarification Text.

The identity, contact information, professional experience, education of the employee candidates, the information shared during interviews or the other personal data contained in the candidate’s CV are processed in order to evaluate the suitability of the employee candidate for the position for which the application is made, to the extent that processing such data is required for exercising a right contained in the article 5/2 of the PDPL and processing such data is required for the legitimate interests of the data controller.

2. THE METHOD AND LEGAL GROUNDS OF COLLECTION OF DATA

As the Company, we benefit from the cookies in order to improve your experiences while you visit the Site. The cookies are small text files stored in your devices or network servers through the browsers of the websites you visit. The use of such technologies is performed in compliance with the legislation, which we are subject to, including the Law.

We may discontinue using the cookies which we use in the Site, we may change their types or functions or may add new cookies to the Site.

If you do not prefer the use of cookies, you may delete or block the cookies from the settings of your browser. However, we would like to remind you that this may influence your use of the Site. It shall be assumed as you accepted/ approved the use of cookies on the Website as long as you do not change the cookie settings over your browser.

The main purposes for using the cookies on the Site as based on the legal grounds of “processing data for the legitimate interests of the data controller is required, on condition not to damage the data subject’s fundamental rights and freedoms” are as follows:

1. To perform the basic functions required for the operation of the Site. For example, the ability for the logged-in members to visit the different pages on the Site without having to re-enter the password.
2. To determine the Site’s intensity at certain time intervals and whether the current servers and the bandwidth is sufficient and to improve the user-experiences of the visitors by performing the system acceleration settings as based on this, within the frame of analyzing the Site and increasing the Site’s performance.
3. To increase the site’s functionality and to provide ease of use. To store the user’s past activities and to remember the user name information or the search queries during the next visits based on this. To share in the third party social media channels which may attract the attention of the visitor according to the activities performed.
4. To provide the legal and commercial security of the Site, you and the Company.

The cookie types used in the Site are as follows:

■ **Session Cookies**

The session cookies are the temporary cookies used during the visitors’ visit of the Site, and which are deleted when the browser is closed.

The basic purpose of using such types of cookies is to provide the smooth operation of the Site during your visit. For example; filling the online forms, which are composed of more than one page, is enabled.

■ **Persistent Cookies**

The Persistent Cookies are the cookies which are used in order to increase the functionality of the Site, to offer faster and better service to our visitors.

Thanks to the Persistent Cookies, it is controlled whether there are cookies on your device, which are created by the Site, if you re-visit the Site with the same device; if there are such cookies, it is understood that you visited the site before and the content to be submitted to you is determined within this direction; accordingly, a better service is offered to you.

■ **Customization Cookies**

These are the cookies used in order to remind the visitors’ preferences when different pages of the different websites are visited. For example, reminding the language preferences you choose.

■ **Analytical Cookies**

Analytical cookies are the cookies that provide the production of the analytical results such as the number of the visitors visiting the website, the pages viewed on the website, the visiting hours of the website, scrolling movements on the website pages etc.

■ **Necessary Cookies**

The use of certain cookies is necessary for the correct operation of the Site. For example, the identity authentication cookies activated when you log-in to the Site provide the continuity of your active session when you pass from one page to another in the Site.

The data of our customers and suppliers may be collected via oral, written or electronic mediums such as agreements, e-mails, telephones etc. Such data can be processed based on the grounds that such data processing is required for the establishment or performance of an agreement, that such data processing is required for the performance of the legal obligations or that such data processing is required for the legitimate interests of the data controller.

The data of the employee candidates can be collected through the applications submitted to our Company over electronic and physical mediums, interviews and discussions carried out as face to face or over the electronic medium and the persons whose contact information are provided as reference.

3. WTHIRD PARTIES TO WHICH PERSONAL DATA ARE TRANSFERRED

The personal data of the customers and suppliers may be transferred to our business partners, other suppliers, the natural persons or legal entity companies from which we receive software and technical support from and to the legally authorized public institutions, to the extent that this is required for the performance of the agreement and the legal obligations. The personal data of the visitors on the other hand may be transferred to our business partners and suppliers, to the extent that this is required for satisfying the visitor's request. Moreover, the data of the customer, supplier, employee candidate and the visitor group can also be transferred to other companies within AKKA Group and servers of the Company abroad as based on the principle of explicit consent, since the Company is a global company and the servers are located abroad. Transfer of personal data to other companies within AKKA Group, that are located outside of Turkey, shall be based on a Processing and Transfer Agreement executed between the transferring and transferee companies. In cases of such transfer, you may refer to the AKKA Group Privacy Policy, which applies to processing of personal data by all the entities within AKKA Group.

4. WHAT ARE YOUR RIGHTS AS A DATA SUBJECT?

In compliance with the article 11 of the Law, you can exercise the following rights by applying to the Company;

1. To learn whether your personal data are processed or not,
2. To demand information as to if your personal data have been processed,
3. To learn the purpose of the processing of your personal data and whether these personal data are used in compliance with the purpose,
4. To know the third parties to whom your personal data are transferred in the country or abroad,
5. To request the rectification of the incomplete or inaccurate data, if the personal data are processed incompletely or inaccurately, and to request the notification of this transaction to the third parties to whom such personal data are transferred,
6. In case the purposes requiring processing of personal data no longer exist, to request deletion, erasure or anonymisation of such data, and to request the notification of this transaction to the third parties to whom such personal data are transferred,
7. To object to the occurrence of a result against you by analyzing the data processed solely through automated systems,
8. To claim compensation for the damage, if he/she suffers damage arising from the unlawful processing of his/her personal data.

You can exercise the above mentioned rights to the Company in the following manner:

- You may fill out the Application Form available at <https://www.akka-technologies.com> and deliver it to the following address of the Company: Akçaburgaz Mahallesi 3019. Sokak No: 1/2 Esenyurt/İstanbul; or,
- You may fill out the Application Form and send it to kvkk@akka.eu by e-mail.

On the other hand, as stated in the introduction of this Clarification Text, you may also refer to AKKA Group Privacy Policy, irrespective of your country of residence. In such case, may send your requests to data-privacy@akka.eu.

If the purposes of processing such personal data or the cookie applications change, then the Company may make changes in this text. In this case, the up to date text shall be applicable on the date it is published over the Site.