

1. Scope

This text relates to the processing activities of personal data of relevant groups such as Obsolix's customers, potential customers, visitors, users, job candidates, suppliers, and business partners under the Law on the Protection of Personal Data No. 6698 ("KVKK"). The scope includes website and online forms, our product and service platforms (e.g., security/monitoring dashboards, demo/sandbox), remote support/call channels, events/organizations, contract and invoicing processes, procurement/logistics, and recruitment activities.

2. Categories of Personal Data Processed

- **Identity/Contact:** Name–surname, title, company, email, phone, address, country. Sensitive personal data (health, biometric, etc.) is not requested. If provided by the data subject without request, it is processed only to the extent necessary for the requested application/process and with safeguards in accordance with KVKK Article 6.

3. Purposes of Data Processing

- **Customer Relations and Communication:** Satisfaction measurement.
- **Quality and R&D:** Product improvement, performance/telemetry analysis, error correction, testing–verification (anonymized/pseudonymized where possible).
- **Marketing/Events (with explicit consent):** Newsletter, campaign/event invitations, case studies/approved references.
- **Legal Obligations and Dispute Resolution.**

4. Methods of Data Collection and Legal Basis

Data is obtained automatically or manually via online forms, contracts and correspondence, call/remote support, product and service records, email/messaging, events, and field operations.

Under KVKK Article 5/2:

- a) Explicitly stipulated by law,
- c) Establishment/performance of a contract (e.g., offer, installation, support),
- ç) Legal obligation of the data controller,
- e) Establishment, use, or protection of a right,
- f) Legitimate interest (security, fraud prevention, quality improvement, logging/recording).

Processing requiring explicit consent (Article 5/1) is not conducted without consent. Sensitive personal data is processed in accordance with KVKK Article 6.

5. Data Transfers (Domestic/International)

Transfers may be made to the following recipients, limited to the purpose and with necessary technical and administrative measures:

- **Service providers/suppliers:** Hosting/cloud, email, ticketing/support, logging/monitoring, security, backup, consultancy.
- **Business partners and group companies (if any):** Integration, field/logistics, on-site services.
- **Authorized persons, institutions, and organizations:** Regulatory/inspection authorities, courts/enforcement offices.
- **Finance and legal consultants:** Audit, dispute management, collections.

International transfers: Obsolix's headquarters is in the UAE, and/or cloud-SaaS services used may be hosted abroad. Under KVKK Article 9, no transfer is made without explicit consent or an appropriate mechanism (adequacy countries determined by the Authority, binding corporate rules, etc.), and necessary disclosure/information is provided.

6. Retention Periods and Deletion

Personal data is retained for the period necessary for the purpose and the minimum–maximum periods in relevant legislation. Upon expiry, periodic deletion, destruction, or anonymization processes are applied. Examples: contract/commercial records according to legal periods, support/call and access logs for reasonable operational security, candidate data for reasonable evaluation period + maximum retention policy. Details are provided in the “Personal Data Retention and Destruction Policy.”

7. Security Measures

- **Technical:** Encryption (e.g., TLS 1.3 in transit, AES-256 at rest), access control/privilege limitation, multi-factor authentication (if any), secure software development, up-to-date vulnerability management, logging–audit trails, backup, network segmentation.
- **Administrative:** Information security/KVKK policies, confidentiality commitments, role-based authorization, awareness training, data protection clauses in supplier contracts, internal audit and breach notification procedures.

8. Data Subject Rights (KVKK Article 11)

You have the following rights:

- Learn whether your personal data is processed and request information,
- Learn the purposes of processing and its usage,
- Know domestic/international third-party recipients,
- Request correction of incomplete/incorrect data,
- Request deletion/destruction/anonymization under KVKK and relevant legislation,
- Request notification of these operations,
- Object to outcomes based solely on automated processing,

- Claim compensation in case of damages.

Application Procedure: Submit requests via appropriate channels verifying your identity to info@obsolix.com, by post to the data controller's address, or through the "Data Subject Application Form" (if any). Requests are concluded within 30 days; additional information/documents may be requested, and fees may apply under KVKK.

9. Automated Decision-Making and Profiling

Automatic analysis/scoring (e.g., anomaly/risk indicators) may be conducted on security/operational telemetry in our products and platforms; outputs are evaluated with human supervision for final decisions. You may object if solely automated processing results in an adverse outcome (Article 11).

10. Personal Data of Children

Our services are aimed at professional/corporate use. Marketing is not deliberately targeted at persons under 18. Any inadvertently provided data is deleted within a reasonable period; parental/guardian consent is requested if necessary.

11. Updates

This Notice may be revised in accordance with legislative changes and updates in business processes. The latest version is published on Obsolix channels and becomes effective immediately.