POL.13 · KVKK

Personal Data Protection and Processing Policy

English translation for information. In case of discrepancy the Turkish text prevails (Türkçe metin esastır).

1 Purpose

This policy sets out the principles and practices of TURKEYSMS BİLİŞİM VE İLETİŞİM HİZMETLERİ TİCARET LİMİTED ŞİRKETİ (the "Company") for the protection and processing of personal data.

2 Scope

This policy covers personal data processed in all of the Company's activities.

3 Core Principles

In processing personal data, the Company complies with the following principles set out in Law No. 6698 on the Protection of Personal Data (the "Law", KVKK):

Lawfulness and fairness
Personal data is processed lawfully and in good faith.

Accuracy
Personal data is kept accurate and, where necessary, up to date.

Purpose limitation
Personal data is processed for specified, explicit and legitimate purposes, in a manner relevant, limited and proportionate to those purposes.

Deletion or anonymisation when the purpose ends
Personal data is deleted, destroyed or anonymised once the reasons requiring its processing no longer exist.

A legal basis for every processing
Personal data is processed on one of the conditions listed in Articles 5 and 6 of the Law; where none of these conditions applies, the explicit consent of the data subject is obtained.

Protection of data subjects' rights
Data subjects have the rights listed in Article 11 of the Law.

4 Processing of Personal Data

The Company processes personal data only lawfully. Personal data may be processed for the following purposes:

- to carry out the Company's commercial activities,
- to provide the Company's services,
- to manage the Company's customer relations,
- to carry out the Company's human resources activities,
- to fulfil the Company's legal obligations,
- to protect the Company's interests.

The Company retains personal data for as long as necessary for the purpose for which it is processed. Retention periods are set out in the Personal Data Retention and Destruction Policy (POL.14).

For the phone numbers of the recipients to whom our customers send messages through the TurkeySMS infrastructure, and for the message contents, the Company acts as a data processor on the customer's instructions. The customer, as data controller, is responsible for obtaining this data lawfully and for obtaining the necessary permissions.

5 Transfer of Personal Data

The Company may transfer personal data to third parties only lawfully. Personal data may be transferred to third parties for the following purposes:

- to carry out the Company's commercial activities,
- to provide the Company's services,
- to manage the Company's customer relations,
- to carry out the Company's human resources activities,
- to fulfil the Company's legal obligations,
- to protect the Company's interests.

Personal data and message contents are stored only on our servers in Türkiye. Our website, customer panel and API are delivered over the Cloudflare network, encrypted, for protection against attacks and uninterrupted access. During this transmission the data may pass through Cloudflare data centres outside Türkiye; Cloudflare processes it only for transmission and security purposes and does not store its content. Analytics (Google Analytics) and marketing (Meta Pixel) cookies on our website run only with your explicit consent, which you can withdraw at any time through Cookie Preferences.

6 Protection of Personal Data

The Company takes the technical and administrative measures necessary to protect personal data. These measures include:

- applying access controls,
- ensuring data security,
- protecting the confidentiality of data,

- preventing unlawful processing of data.

Under the privacy and protection of personally identifiable information (POL.10), the Company, as data controller:

- takes all technical and administrative measures needed to ensure an appropriate level of security in order to prevent unlawful processing of and unlawful access to personal data and to ensure its safekeeping,
- is jointly responsible with any natural or legal person processing personal data on its behalf for taking these measures,
- carries out, or has carried out, the audits necessary to ensure that the provisions of the Law are applied.

Company employees and data processors may not disclose the personal data they learn to others in breach of the Law or use it for purposes other than processing. This obligation continues after they leave their position.

7 Rights of the Data Subject

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

- learn whether their personal data is processed,
- request information if their personal data has been processed,
- learn the purpose of processing and whether the data is used in line with that purpose,
- know the third parties in Türkiye or abroad to whom their personal data is transferred,
- request the correction of incomplete or inaccurate personal data,
- request the deletion or destruction of their personal data under the conditions in Article 7 of the Law,
- request that correction, deletion or destruction be notified to the third parties to whom the data was transferred,
- object to a result against them arising from the analysis of the data exclusively through automated systems,
- claim compensation for damage suffered due to unlawful processing of their personal data.

8 Applications

Data subjects may submit requests regarding these rights to the Company in writing or by other methods determined by the Personal Data Protection Board. The application methods and the information an application must contain are explained in the KVKK Information Notice. Applications are concluded free of charge as soon as possible according to the nature of the request, and within thirty days at the latest.

9 Amendments

The Company may amend this policy when necessary. Amendments are announced to the persons concerned by publication on the Company's website.

APPROVED BY	ISSUE DATE
TURKEYSMS BİLİŞİM VE İLETİŞİM HİZMETLERİ TİCARET LİMİTED ŞİRKETİ	**06.01.2026**
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