

01

Introduction

Purpose of Policy
Scope
Definitions
Enforcement of Policy

02

Information Regarding Personal Data Processing Activities Conducted by the Company

Data Owners
Purposes of Processing Personal Data
Personal Data Categories

03

Principles and Conditions Regarding the Processing of Personal Data

Principles Concerning the Processing of Personal Data
Conditions Regarding the Processing of Personal Data
Processing of Special Personal Data

04

Transfer of Personal Data

Transfer of personal data to third parties within the country
Transfer of personal data to third parties abroad
Third parties to whom personal data is transferred and the purposes for which they are transferred

05

Data Owner's Rights and Exercise of Related Rights

Rights of personal data owner
Situations where the personal data owner cannot assert his/her rights

06

Deletion, Destruction, Anonymization of Personal Data

1- INTRODUCTION

PURPOSE OF POLICY

As the company YUCHISOFT BİLİŞİM SİSTEM VE ÇÖZÜMLERİ SANAYİ VE TİCARET LİMİTED ŞİRKETİ (“Company” and “Company”), within the scope of the Personal Data Protection Law No. 6698 (“Law”), processing and protecting personal data in accordance with the law is among our most important priorities. We follow the same priority in all our planning and business activities. In this context, to enlighten you in accordance with Article 10 of the Law; We present this Personal Data Processing and Protection Policy ("Policy") to your information in order to inform you of all the administrative and technical measures we will implement within the scope of processing and protecting personal data.

SCOPE

This Policy determines the conditions for processing personal data and reveals the principles adopted by the Company in the processing of personal data. In this context, Politics; It covers all personal data processing activities within the scope of the Law carried out by the company, all personal data processed and the owners of this data.

DEFINITIONS

Explicit Consent	Consent regarding a specific issue, based on informed consent and expressed with free will.
Anonymization	Making data that was previously associated with a person impossible to associate it with an identified or identifiable real person in any way, even by matching it with other data.
Employee Candidate	Real persons who do not work within the company but have the status of candidate employees.
Personal Data	Any information regarding an identified or identifiable natural person.
Data Owner	The real person whose personal data is processed.
Processing of Personal Data	Obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or using personal data by fully or partially automatic or non-automatic means provided that it is part of any data recording system. Any action performed on data, such as blocking.
Law	Personal Data Protection Law No. 6698, published in the Official Gazette No. 29677 dated April 7, 2016.
Special Personal Data	Data regarding race, ethnic origin, political thought, philosophical belief, religion, sect or other beliefs, appearance, association, foundation or union membership, health, sexual life, criminal conviction and security measures, as well as biometric and genetic data.

Policy	Company Company Personal Data Processing and Protection Policy
Company/Firm	Company Company
Data Processor	It is a real or legal person who processes personal data on behalf of the data controller, based on the authority given by the data controller.
Data Controller	The person who determines the purposes and means of processing personal data and manages the place where the data is systematically kept.
Data Logging System	It is a recording system in which personal data is structured and processed according to certain criteria.
Business Partners	Persons with whom the Company has established partnerships within the scope of contractual relations within the framework of its commercial activities.

ENFORCEMENT OF POLICY

This Policy issued by the Company entered into force on 10.01.2023 and was made available to the public. In case of conflict between the current legislation, especially the Law, and the regulations contained in this Policy, the provisions of the legislation shall apply.

The Company reserves the right to make changes to the Policy in parallel with legal regulations. You can access the current version of the Policy on the Company's website (<https://www.yuchisoft.com>)

2- INFORMATION REGARDING PERSONAL DATA PROCESSING ACTIVITIES CONDUCTED BY THE COMPANY

DATA OWNERS

Data owners within the scope of the Policy are all natural persons, other than Company employees, whose personal data are processed by the Company. In general, data owners can be listed as follows:

DATA OWNER CATEGORIES	EXPLANATION
Customers	It refers to real people who benefit from the products and services offered by the Company and real people who show interest in the products and services offered by the Company and have the potential to become customers.
Employee	Working in the Company, Company Shareholder, Company Official, Group Company Employee/Shareholder/Officer/Board Members White collar, blue collar, Former Employee / Retired, Employee Candidate, Active Intern, Intern Candidate
Potential Customers	It refers to real people who show interest in the products and services offered by the Company and have the potential to become customers.
Employee Candidates	It refers to real persons who apply for a job by sending a CV to the Company or by other methods.
Visitors	It refers to people who visit the Company for any reason.
Third Parties	It refers to natural persons, excluding the data subject categories listed above and Company employees.

The data subject categories described in the table above are stated for general information sharing purposes. The fact that the data owner does not fall within the scope of any of these categories does not eliminate his/her status as a data owner as stated in the Law.

PURPOSES OF PROCESSING PERSONAL DATA

Carrying out the necessary work by the relevant units and carrying out the business processes in order to benefit the relevant people from the products and services offered by the Company:

1. Planning and executing sales processes of products and/or services,
2. Planning and/or execution of after-sales support services activities,
3. Planning and execution of customer relationship management processes,
4. Follow-up of contract processes and/or legal requests,
5. Follow-up of customer requests and/or complaints.

PLANNING AND EXECUTION OF COMPANY HUMAN RESOURCES POLICIES AND PROCESSES:

1. Planning and execution of talent-career development activities,
2. Fulfillment of obligations arising from employment contracts and/or legislation for company employees,
3. Planning and execution of fringe benefits and benefits for employees,
4. Planning and execution of in-company orientation activities,
5. Planning and execution of personnel exit procedures,
6. Salary Management
7. Planning human resources processes,
8. Managing personnel recruitment processes,
9. Planning and executing appointment-promotion and resignation processes for the company,
10. Planning and execution of employee performance evaluation processes,
11. Monitoring and/or supervision of employees' work activities,
12. Planning and/or execution of in-company training activities,
13. Planning and execution of employee satisfaction and/or loyalty processes,
14. Planning and executing the processes of receiving and evaluating employees' suggestions for improving work and/or production processes,
15. Planning and/or executing intern and/or student recruitment, placement and operation processes.

CARRYING OUT THE NECESSARY WORK BY THE RELEVANT BUSINESS UNITS AND CARRYING OUT THE RELATED BUSINESS PROCESSES IN ORDER TO REALIZE THE COMMERCIAL ACTIVITIES CARRIED OUT BY THE COMPANY:

1. Event management,
2. Planning and execution of business activities,
3. Planning and execution of corporate communication activities,
4. Planning and execution of supply chain management processes,
5. Planning and execution of production and/or operation processes,
6. Planning, auditing and execution of information security processes,
7. Establishing and managing information technology infrastructure,
8. Planning and execution of business partners' access to information authorizations,
9. Follow-up of finance and/or accounting affairs,
10. Planning and execution of corporate sustainability activities,
11. Planning and execution of corporate governance activities,
12. Planning and/or execution of business continuity activities,
13. Planning and execution of logistics activities.

PLANNING AND EXECUTING THE ACTIVITIES NECESSARY TO RECOMMEND AND PROMOTE THE PRODUCTS AND SERVICES OFFERED BY THE COMPANY TO RELEVANT PEOPLE BY CUSTOMIZING THEM ACCORDING TO THEIR TASTES, USAGE HABITS AND NEEDS:

1. Identification and/or evaluation of people to be subject to marketing activities in line with consumer behavior criteria,
2. Designing and/or executing personalized marketing and/or promotional activities,
3. Designing and/or executing advertising and/or promotion and/or marketing activities in digital and/or other media,
4. Designing and/or executing activities to be developed on customer acquisition and/or value creation for existing customers in digital and/or other channels,
5. Planning and/or performing data analytics studies for marketing purposes,
6. Planning and execution of marketing processes of products and/or services,
7. Planning and/or executing the processes of creating and/or increasing loyalty to the products and/or services offered by the company.

PLANNING AND EXECUTION OF THE COMPANY'S COMMERCIAL AND/OR BUSINESS STRATEGIES:

Managing relationships with business partners

ENSURING THE LEGAL, TECHNICAL AND COMMERCIAL OCCUPATIONAL SAFETY OF THE COMPANY AND THE RELEVANT PERSONS WHO HAVE A BUSINESS RELATIONSHIP WITH THE COMPANY:

1. Follow-up of legal affairs
2. Planning and executing necessary operational activities to ensure that company activities are carried out in accordance with company procedures and/or relevant legislation,
3. Providing information regarding legislation to authorized institutions,
4. Creating and tracking visitor records,
5. Planning and execution of emergency management processes,
6. Carrying out company and partnership law transactions,
7. Planning and execution of company audit activities,
8. Planning and/or execution of occupational health and/or safety processes,
9. Carrying out risk management of credit processes,
10. Ensuring the security of company campuses and/or facilities,
11. Ensuring the security of company operations,
12. Planning and/or execution of the company's financial risk processes,
13. Ensuring the security of company assets and/or resources.

PERSONAL DATA CATEGORIES

Personal data categorized as follows by the company is processed in accordance with the personal data processing conditions in the Law and relevant legislation:

DATA CATEGORY	EXPLANATION
Credentials	Information contained in documents such as driver's license, identity card, residence, passport, lawyer ID, marriage certificate.
Communication Information	Information used to contact the person (e.g. email address, telephone number, mobile number, address).
Location information	Information used to identify the location of the data subject (e.g. location information obtained while driving).
Customer Information	Information about customers who benefit from our products and services (e.g. customer number, professional information, etc.).
Customer Transaction Information	Information regarding all kinds of transactions carried out by customers who benefit from our products and services.

DATA CATEGORY	EXPLANATION
Physical Location Security Information	Personal data regarding records and documents such as camera recordings and fingerprint records taken upon entering the physical location and during the stay in the physical location.
Process Security Information	Personal data processed to ensure technical, administrative, legal and commercial security while conducting the Company's commercial activities.
Financial Information	Personal data processed regarding information, documents and records showing all kinds of financial results created according to the type of legal relationship the Company has established with the personal data owner.
Employee Candidate Information	Personal data processed regarding individuals who have applied to become employees of the Company or who have been evaluated as employee candidates in line with human resources needs in accordance with commercial practices and honesty rules, or who are in a working relationship with the Company.
Legal Action and Compliance Information	Personal data processed within the scope of determining and pursuing the company's legal receivables and rights, fulfilling its debts, and complying with its legal obligations and company policies.
Audit and Inspection Information	Personal data processed within the scope of the Company's legal obligations and compliance with company policies.
Special Quality Data	Data regarding people's race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures, as well as biometric and genetic data.
Marketing Information	Personal data processed for the marketing of the products and services offered by the Company by customizing them in line with the usage habits, tastes and needs of the personal data owner, and reports and evaluations created as a result of this processing.
Request/Complaint Management Information	Personal data regarding the receipt and evaluation of any requests or complaints directed to the Company.
Reputation Management Information	Information about the information collected for the purpose of protecting the commercial reputation of the company and the evaluation reports prepared regarding this and the actions taken.
Incident Management Information	Personal data processed to take the necessary legal, technical and administrative measures against events that occur in order to protect the commercial rights and interests of the Company and the rights and interests of its customers.

3- PRINCIPLES AND CONDITIONS REGARDING THE PROCESSING OF PERSONAL DATA

The Company, regarding the processing of personal data in accordance with Article 4 of the Law; It processes personal data in a limited and proportionate manner, in accordance with the law and the rules of honesty, in accordance with the law, in accordance with the rules of honesty, and when necessary, up-to-date, specific, clear and legitimate, in connection with the purpose. The company retains personal data for as long as required by law or required by the purpose of processing personal data.

PRINCIPLES CONCERNING THE PROCESSING OF PERSONAL DATA

The company aims to inform data owners in accordance with Article 10 of the Personal Data Protection Law and processes these personal data based on the principles set out below, by requesting consent from data owners in cases where consent is required.

PROCESSING OF DATA IN ACCORDANCE WITH THE LAW AND THE RULES OF HONESTY

The company acts in accordance with the principles introduced by legal regulations and the general rule of trust and honesty in the processing of personal data. In accordance with the principle of compliance with the rule of honesty, the Company takes into account the interests and reasonable expectations of the relevant persons while trying to achieve its goals in data processing.

ENSURING THAT PERSONAL DATA IS ACCURATE AND UP-TO-DATE WHEN NECESSARY

Keeping personal data accurate and up-to-date is necessary for the Company to protect the fundamental rights and freedoms of the person concerned. The Company has an active duty of care to ensure that personal data is accurate and up-to-date when necessary. For this reason, all communication channels are open to ensure that the information of the relevant person who is the data owner of the Company is kept accurate and up-to-date.

PROCESSING OF DATA FOR SPECIFIC, CLEAR AND LEGITIMATE PURPOSES

The company clearly and precisely determines the purpose of processing personal data, which is legitimate and lawful. It processes personal data in connection with and necessary for the commercial activities it carries out.

DATA MUST BE RELATED TO THE PURPOSE FOR WHICH THEY ARE PROCESSED, LIMITED AND PROPORTIONATE

Company; It processes personal data for purposes related to its field of activity and necessary for the execution of its business. For this reason, it processes personal data in a way that is suitable for achieving the specified purposes and avoids the processing of personal data that is not relevant or needed to achieve the purpose.

KEEPING DATA FOR THE PERIOD ENVISAGED IN THE RELEVANT LEGISLATION OR NECESSARY FOR THE PURPOSE FOR WHICH THEY ARE PROCESSED

The company retains personal data only for the period specified in the relevant legislation or necessary for the purpose for which they are processed. In this context; First of all, it determines whether the relevant legislation stipulates a period of time for the storage of personal data, if a period is determined, it acts in accordance with this period, and if a period is not determined, it stores personal data for the period necessary for the purpose for which they are processed. Personal data is deleted, destroyed or anonymized by the Company after the purpose of processing personal data ceases or upon expiry of the period stipulated in the legislation.

CONDITIONS REGARDING THE PROCESSING OF PERSONAL DATA

Your personal data is processed by the Company if at least one of the personal data processing conditions specified in Article 5 of the Law is met.

EXPLICIT CONSENT OF THE PERSONAL DATA OWNER

One of the conditions for processing personal data is the explicit consent of the owner. The express consent of the personal data owner must be expressed on a specific subject, based on informed consent and free will. In order to process personal data based on the explicit consent of the personal data owner, explicit consent is obtained from customers, potential customers and visitors by relevant methods.

PERSONAL DATA PROCESSING ACTIVITIES ARE CLEARLY PRESCRIBED BY LAW

Personal data of the data owner can be processed lawfully without the explicit consent of the data owner, if it is clearly provided for by law.

INABILITY TO OBTAIN THE PERSON'S EXPLICIT CONSENT DUE TO ACTUAL IMPOSSIBILITY

The personal data of the data owner may be processed if it is necessary to process the personal data of the person who is unable to express his/her consent due to actual impossibility or whose consent will not be recognized as valid in order to protect the life or physical integrity of himself or another person.

PERSONAL DATA IS DIRECTLY RELATED TO THE ESTABLISHMENT OR PERFORMANCE OF A CONTRACT

It is possible to process personal data if it is necessary to process personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract.

FULFILLMENT OF THE COMPANY'S LEGAL OBLIGATION

Personal data of the data owner may be processed if processing is necessary for the Company to fulfill its legal obligations as the data controller.

PUBLICIZATION OF PERSONAL DATA OF THE DATA OWNER

If the data owner has made his/her personal data public, the relevant personal data can be processed.

DATA PROCESSING IS MANDATORY FOR THE ESTABLISHMENT OR PROTECTION OF A RIGHT

If data processing is mandatory for the establishment, exercise or protection of a right, the personal data of the data owner may be processed.

DATA PROCESSING IS MANDATORY FOR THE LEGITIMATE INTEREST OF THE COMPANY

Personal data of the data owner may be processed if it is necessary to process data for the legitimate interests of the Company, provided that the fundamental rights and freedoms of the personal data owner are not harmed.

PROCESSING OF SPECIAL PERSONAL DATA

In the processing of personal data determined as "special nature" by the GDPR Law, the company strictly complies with the regulations stipulated in the GDPR Law.

By the company; Special personal data are processed in the following cases, provided that adequate measures are taken to be determined by the GPDR Board:

- If the personal data owner has explicit consent or
- If there is no explicit consent of the personal data owner;
- Special categories of personal data, other than the health and sexual life of the personal data owner, in cases stipulated by law,
- Special personal data regarding the health and sexual life of the personal data owner can only be used by persons or authorized institutions and organizations under the obligation of confidentiality for the purpose of protecting public health, carrying out preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and their financing. is processed by.

4- TRANSFER OF PERSONAL DATA

The company can transfer the data owner's personal data and sensitive personal data to third parties at home or abroad by taking the necessary security measures in line with the legal personal data processing purposes. In this regard, the company acts in accordance with the regulations stipulated in Article 8 of the GPDR Law.

TRANSFER OF PERSONAL DATA TO THIRD PARTIES WITHIN THE COUNTRY

Your personal data can be transferred by the Company if at least one of the data processing conditions specified in Articles 5 and 6 of the Law and explained under Title 3 of this Policy is met and provided that the basic principles regarding data processing conditions are complied with.

TRANSFER OF PERSONAL DATA TO THIRD PARTIES ABROAD

The company may transfer the personal data and sensitive personal data of the personal data owner to third parties abroad, provided that at least one of the data processing conditions described under Title 3 of this Policy is met and by taking the necessary security measures. Personal data by the company; To foreign countries that have been declared to have adequate protection by the GPDR Board (“Foreign Country with Adequate Protection”) or, in case there is no sufficient protection, to foreign countries where the data controllers in Turkey and the relevant foreign country have committed in writing to adequate protection and have the permission of the GPDR Board. (“Foreign Country Where the Data Controller Committed to Adequate Protection is Located”) is transferred. In this regard, the company acts in accordance with the regulations stipulated in Article 9 of the GPDR Law.

THIRD PARTIES TO WHOM PERSONAL DATA IS TRANSFERRED AND THE PURPOSES FOR WHICH THEY ARE TRANSFERRED

Within the general principles of the law and the data processing conditions in Articles 8 and 9, the Company can transfer data to the parties categorized in the table below:

PERSONS TO WHOM DATA CAN BE TRANSFERRED	DEFINITION	PURPOSE
Business Partner	Parties with which the Company establishes business partnerships while carrying out its commercial activities	Limited sharing of personal data in order to ensure that the purposes of establishing the business partnership are fulfilled.
Shareholders	Shareholders who are authorized to design strategies and audit activities regarding the Company's commercial activities in accordance with the relevant legislation.	Sharing of personal data limited to the design of strategies regarding the Company's commercial activities and audit purposes
Company Officials	Board members and other authorized persons	Designing strategies regarding the Company's commercial activities, ensuring their management at the highest level and sharing personal data limited to audit purposes
Legally Authorized Public Institutions and Organizations	Public institutions and organizations legally authorized to receive information and documents from the Company	Personal data sharing limited to the purpose of requesting information from relevant public institutions and organizations
Legally Authorized Private Legal Persons	Private legal persons who are legally authorized to receive information and documents from the Company	Sharing of data limited to the purpose requested by the relevant private law persons within their legal authority

5- DATA OWNER'S RIGHTS AND EXERCISE OF RELATED RIGHTS

RIGHTS OF PERSONAL DATA OWNER:

1. Learning whether personal data is being processed or not,
2. Requesting information if personal data has been processed,
3. Learning the purpose of processing personal data and whether they are used for their intended purpose,
4. Knowing third parties to whom personal data is transferred domestically or abroad,
5. Requesting correction of personal data in case of incomplete or incorrect processing and requesting that the action taken in this context be notified to third parties to whom personal data has been transferred,
6. Requesting the deletion or destruction of personal data in case the reasons requiring processing are eliminated, even though it has been processed in accordance with the provisions of the GDPR Law and other relevant laws, and requesting that the transaction carried out in this context be notified to third parties to whom personal data has been transferred,
7. Objecting to a result that is unfavorable to the person by analyzing the processed data exclusively through automatic systems,
8. Requesting compensation for damage in case of damage due to illegal processing of personal data.

If personal data is not obtained directly from the data owner; The company will: (1) within a reasonable time after obtaining personal data, (2) if the personal data will be used for communication purposes with the data owners, during the first communication, (3) if the personal data will be transferred, at the latest, for the first time Activities are carried out to inform data owners during the transfer.

SITUATIONS WHERE THE PERSONAL DATA OWNER CANNOT ASSERT HIS/HER RIGHTS

Personal data owners cannot assert their rights listed in 5.1 on these issues, as the following situations are excluded from the scope of the GPDR Law in accordance with Article 28 of the GPDR Law:

1. Processing of personal data by natural persons within the scope of activities related to themselves or their family members living in the same residence, provided that they are not given to third parties and obligations regarding data security are complied with,
2. Processing of personal data for purposes such as research, planning and statistics by anonymizing them with official statistics,
3. Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defence, national security, public security, public order, economic security, privacy of private life or personal rights or constitute a crime,
4. Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defence, national security, public safety, public order or economic security,
5. Processing of personal data by judicial authorities or enforcement authorities regarding investigation, prosecution, trial or enforcement proceedings.

28.2 of the GPDR Law. In accordance with the article; In the cases listed below, personal data owners cannot assert their other rights listed in 5.1, except for the right to demand compensation for damage:

1. Processing of personal data is necessary for the prevention of crime or criminal investigation,
2. Processing of personal data made public by the personal data owner,
3. Processing of personal data is necessary for the execution of auditing or regulatory duties and disciplinary investigation or prosecution by public institutions and organizations and professional organizations that are public institutions, based on the authority granted by the law,
4. Processing of personal data is necessary to protect the economic and financial interests of the State regarding budget, tax and financial matters.

6- DELETION, DESTRUCTION, ANONYMIZATION OF PERSONAL DATA

Even though it has been processed in accordance with the provisions of the relevant law, as regulated in Article 138 of the Turkish Penal Code and Article 7 of the GPDR Law, personal data will be deleted and destroyed based on the decision of the Company or upon the request of the personal data owner, in case the reasons requiring processing are eliminated. or made anonymous. In this context, the Company takes the necessary technical and administrative measures within the Company in order to fulfill its relevant obligations; It has developed the necessary operating mechanisms in this regard; It trains, assigns and raises awareness of relevant business units to comply with these obligations.

Contact Us

Contact us to convey all your questions and opinions about the Personal Data Protection Policy!