

ARKSOFT BİLİŞİM TEKNOLOJİ TİC. SAN. A.Ş.
PRIVACY NOTICE

Version 1.0 — Effective Date: 26.08.2026

1. IDENTITY OF THE DATA CONTROLLER

This Privacy Notice has been prepared by ARKSOFT BİLİŞİM TEKNOLOJİ TİC. SAN. A.Ş. ("ARKSOFT", the "Company") in its capacity as data controller, pursuant to Article 10 of the Turkish Personal Data Protection Law No. 6698 (the "Law" or "KVKK") and the Communiqué on the Procedures and Principles to be Followed in Fulfilling the Obligation to Inform.

- **Legal name:** ARKSOFT BİLİŞİM TEKNOLOJİ TİC. SAN. A.Ş.
- **Address:** Üniversiteler Mahallesi 1596. Cadde Teknokent Kuluçka Merkez Binası C Blok Kat 9 No 74 Çankaya / Ankara, Türkiye
- **MERSİS No:** 0079041681000001 — Tax No: 0790416810
- **Telephone:** +90 312 502 21 21 — E-mail: info@arksoft.com.tr
- **Websites:** <https://www.arksoft.com.tr> — <https://www.storionx.com/>

United Kingdom representative

In respect of ARKSOFT's activities directed at data subjects located in the United Kingdom, the representative appointed pursuant to Article 27 of the UK GDPR is set out below. Data subjects located in the United Kingdom may address their requests either directly to the Company or to the representative.

- **Representative:** Tahir Emre ESİRGİN
- **Address:** First Floor, 31-33 High Holborn, London, WC1V 6AX, United Kingdom
- **E-mail:** info@arksoft.com.tr

Matters outside the scope of this Notice

In respect of personal data held within the information systems of corporate customers using StorionX and ARKSOFT's other products, ARKSOFT acts as a data processor and not as a data controller. The rights and obligations arising in that context are governed by the Data Processing Agreement concluded between the customer and ARKSOFT and fall outside the scope of this Privacy Notice. Employees and users of our customers should address requests concerning their own data to their own organisation, which acts as the data controller.

2. SCOPE

This Privacy Notice covers the following activities carried out by ARKSOFT in its capacity as data controller. The Notice applies to all of the Company's websites; the cookies and tracking technologies actually used on each website are set out separately in the Cookie Notice published on that website.

- Visits to our websites and the processing of data through cookies;
- Receipt of contact, information and demonstration requests;
- Receipt of technical support and customer service requests;
- Newsletter subscriptions and the sending of commercial electronic messages;
- Registrations for events, webinars and training sessions;
- Commercial communications conducted with suppliers, business partners and customer representatives.

In respect of data subjects located in the United Kingdom, the provisions of the UK GDPR and the Privacy and Electronic Communications Regulations (PECR) apply in addition to the KVKK. The additional rights afforded to such persons are set out in Article 10 of this Notice.

3. PERSONAL DATA PROCESSED, PURPOSES OF PROCESSING AND LEGAL BASES

3.1. Visits to our websites

Personal data processed: IP address, browser and device information, operating system, pages visited, date and time of visit, referring address, cookie identifiers, cookie preference records.

Purposes: Operation of the website and provision of its core functions, ensuring information and system security, error detection, remembering preferences, compilation of visit statistics and the conduct of promotional activities.

Legal bases: In respect of strictly necessary cookies, Article 5/2-(ç) of the KVKK (compliance with a legal obligation) and Article 5/2-(f) (legitimate interests, namely ensuring the secure operation of the website); in respect of functional, analytics and advertising/marketing cookies, Article 5/1 of the KVKK (explicit consent). Under the UK GDPR, Article 6(1)(f) legitimate interests and Article 6(1)(a) consent respectively; under PECR, consent is required for all non-essential cookies.

3.2. Contact, information and demonstration requests

Personal data processed: Name, surname, corporate e-mail address, telephone number, company name, role/department information, content of the request and correspondence records.

Purposes: Receipt and response to the request, provision of information about products and services, conduct of demonstration and quotation processes, management of pre-contractual discussions.

Legal bases: Article 5/2-(c) of the KVKK (directly related to the conclusion or performance of a contract) and Article 5/2-(f) (legitimate interests, namely the conduct of commercial activities). UK GDPR Articles 6(1)(b) and 6(1)(f).

3.3. Technical support and customer service requests

Personal data processed: Name, surname, corporate contact details, organisation represented, content of the support ticket, technical logs and screenshots, correspondence records.

Purposes: Recording and resolution of support requests, measurement of service quality, fulfilment of contractual obligations, evidentiary purposes in the event of a dispute.

Legal bases: Article 5/2-(c) of the KVKK (performance of a contract), Article 5/2-(e) (establishment and protection of a right) and Article 5/2-(f) (legitimate interests). UK GDPR Articles 6(1)(b), 6(1)(c) and 6(1)(f).

3.4. Newsletter subscriptions and commercial electronic messages

Personal data processed: Name, surname, e-mail address, telephone number, company and role information, message delivery and engagement records, consent records.

Purposes: Delivery of product announcements, sector content and event invitations; conduct of promotional and marketing activities.

Legal basis: Article 5/1 of the KVKK (explicit consent); UK GDPR Article 6(1)(a) consent. In addition, consent obtained pursuant to the Turkish Law No. 6563 on the Regulation of Electronic Commerce is recorded through the Message Management System (İYS). Consent may be withdrawn at any time and an opt-out facility is provided in every message.

3.5. Events, webinars and training registrations

Personal data processed: Name, surname, corporate contact details, organisation and role information, attendance records; where the event is recorded, audio and video recordings.

Purposes: Management of registration and attendance processes, provision of information before and after the event, issuance of attendance certificates.

Legal bases: Articles 5/2-(c) and 5/2-(f) of the KVKK; in respect of audio and video recordings and the use of such recordings for promotional purposes, Article 5/1 (explicit consent). UK GDPR Articles 6(1)(b), 6(1)(f) and 6(1)(a).

3.6. Commercial communications with suppliers, business partners and customer representatives

Personal data processed: Name, surname, role, corporate contact details, signature and authorisation documents, information relating to invoicing and payment processes, correspondence records.

Purposes: Establishment and conduct of the commercial relationship, management of contractual processes, fulfilment of financial and legal obligations.

Legal bases: Article 5/2-(a) of the KVKK (expressly provided for by law), Article 5/2-(c) (performance of a contract), Article 5/2-(ç) (compliance with a legal obligation) and Article 5/2-(f) (legitimate interests). UK GDPR Articles 6(1)(b), 6(1)(c) and 6(1)(f).

4. METHOD OF COLLECTION

Personal data are collected by wholly or partly automated means, and by non-automated means, through website forms, e-mail, telephone, cookies and similar tracking technologies, event registration platforms, recruitment websites and documents submitted directly.

5. TRANSFERS OF PERSONAL DATA

Your personal data may be transferred to the following categories of recipient, in accordance with the conditions set out in Articles 8 and 9 of the KVKK and limited to the purposes specified in Article 3 of this Notice:

- **Suppliers and service providers:** Website hosting, e-mail, cloud and information technology infrastructure providers;
- **Software and platform providers:** Customer relationship management (CRM), support ticketing, event management and newsletter distribution platforms;
- **Analytics and advertising service providers:** For the measurement of website usage and the conduct of promotional activities, only where explicit consent has been given;
- **Professional advisers:** Financial advisers, independent auditors and legal counsel;
- **Competent authorities:** Competent public authorities and judicial bodies, upon request and as required by law.

The transfers set out above are based on the following legal grounds: express provision by law; the transfer being directly related to the conclusion or performance of a contract; the necessity of processing for the Company to fulfil its legal obligations; the necessity of processing for the establishment, exercise or protection of a right; and the legitimate interests of the Company. Where none of these legal grounds applies, transfers are carried out solely on the basis of your explicit consent.

Within the Company, your personal data may be accessed only by authorised employees whose duties require such access; such access does not constitute a transfer within the meaning of the Law.

6. TRANSFERS OF PERSONAL DATA ABROAD

The Company's websites and related systems are hosted on the Microsoft Azure cloud infrastructure, in the West Europe (Netherlands) region. Accordingly, personal data collected within the scope of this Notice are transferred abroad within the meaning of the KVKK.

In addition, the analytics and advertising/marketing tools used on our websites, together with certain cloud-based software services, are provided by suppliers whose servers are located abroad. Non-essential cookies and tracking technologies are not activated unless explicit consent has been given, and no additional transfer takes place in the absence of such consent.

Transfers abroad are carried out within the framework of the conditions set out in Article 9 of the KVKK, namely transfers to countries in respect of which the Turkish Personal Data Protection Board has issued an adequacy decision, or subject to the provision of appropriate safeguards such as a standard contract, an undertaking or binding corporate rules. Where standard contracts are concluded, notification is made to the Turkish Data Protection Authority within the period prescribed by law. Should you request a copy of the safeguards applied, this will be provided to you with any commercially confidential information redacted.

7. RETENTION PERIODS

Personal data are retained for as long as required by the purpose of processing, taking into account the limitation and retention periods prescribed by law. Where the purpose ceases to exist, or where consent is withdrawn, the data are erased, destroyed or anonymised. Erasure and destruction are carried out within the applicable periodic erasure intervals.

Category of data	Retention period
Cookie data	Varies by cookie type; periods are set out in the Cookie Notice
Cookie preference (consent) records	6 months
System log records	6 months
Security log records	1 year
Records evidencing that the privacy notice was read	3 years
Contact, demonstration and quotation records	1 year where no commercial relationship is established
Support records and contractual documentation	10 years from termination of the contractual relationship
Commercial electronic message consent and delivery records	1 year from the date on which the consent ceased to be valid
Event and webinar records	1 year

8. AUTOMATED DECISION-MAKING

No decision based solely on automated processing that produces legal effects concerning a data subject or significantly affects a data subject is taken in the activities covered by this Notice. Interest-based grouping carried out in connection with advertising and marketing cookies does not constitute such a decision.

9. YOUR RIGHTS UNDER THE KVKK

Pursuant to Article 11 of the KVKK, you have the right to:

- Learn whether your personal data are being processed;
- Request information if your personal data have been processed;
- Learn the purpose of processing and whether the data are used in accordance with that purpose;
- Know the third parties, in Türkiye or abroad, to whom your personal data have been transferred;
- Request the rectification of incomplete or inaccurately processed data;
- Request the erasure or destruction of your personal data within the conditions set out in the Law;

- Request that rectification, erasure and destruction be notified to the third parties to whom the data have been transferred;
- Object where a result adverse to you arises from processing carried out solely by automated means;
- Claim compensation for damage suffered as a result of unlawful processing.

10. ADDITIONAL RIGHTS OF DATA SUBJECTS LOCATED IN THE UNITED KINGDOM

If you are located in the United Kingdom, you have the following additional rights under the UK GDPR:

- The right to request restriction of processing (Article 18);
- The right to data portability (Article 20);
- The right to object to processing based on legitimate interests (Article 21);
- The right to object at any time, and without any condition, to processing for direct marketing purposes (Article 21(2));
- In respect of processing based on consent, the right to withdraw your consent at any time; withdrawal does not affect the lawfulness of processing carried out before the withdrawal;
- The right to lodge a complaint with the supervisory authority, the Information Commissioner's Office (ICO).

To exercise these rights you may contact the Company or the United Kingdom representative identified in Article 1. Requests are, as a rule, responded to free of charge within one month.

11. HOW TO SUBMIT A REQUEST

Pursuant to the Communiqué on the Procedures and Principles of Application to the Data Controller, you may submit your requests in writing to the Company's address by signed letter, by secure electronic signature or mobile signature, or from an e-mail address previously registered in the Company's systems to info@arksoft.com.tr. You may, if you wish, use the Data Subject Request Form available on our website; use of the form is not mandatory.

Your request must state your name and surname, your signature, your Turkish Republic identity number (for foreign nationals, nationality and passport number), your address for service, your e-mail address and telephone number if applicable, and the subject matter of your request. Requests are concluded free of charge as soon as possible and in any event within thirty (30) days of receipt by the Company. Where the process entails an additional cost, a fee may be charged in accordance with the tariff determined by the Turkish Personal Data Protection Board.

Requests submitted through a representative must be accompanied by a power of attorney containing specific authority. Identity verification may be carried out in order to conclude the request.

Should your request be refused, should the response be considered insufficient, or should no response be provided within the applicable period, you may lodge a complaint with the Turkish Personal Data Protection Board within thirty (30) days of becoming aware of the response and in any event within sixty (60) days of the date of your request. Data subjects located in the United Kingdom may also lodge a complaint with the ICO.

12. UPDATES

This Privacy Notice may be updated in line with changes in applicable legislation and in the Company's data processing activities. The current version is published on our websites together with its version number and effective date.