

	<b>CUSTOMER DISCLOSURE TEXT</b>	Document No:	KVK.F010
		Effective Date:	01.10.2021
		Revision No:	03
		Revision Date:	02.01.2025
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This Disclosure Text has been prepared by VBT Yazılım A.Ş. (“Our Company”), the Data Controller located at QUICK TOWER, İçerenköy Mh. Umut Sk. No:10-12 K:13 D:57-60 PK:34752 Ataşehir/İstanbul, in order to inform our customers and to fulfil the disclosure obligation within the scope of the Personal Data Protection Law No. 6698 (KVKK) and other relevant legislation.

Our Company's Policies and Disclosure Texts regarding the Protection of Personal data are available at [VBT Software - Ethical Principles and Policies](#)

### 1. PERSONAL DATA COLLECTION METHODS AND LEGAL REASONS

Your personal data is collected in accordance with the relevant legislation through the following methods;

- By e-mail,
- Through cameras,
- Through the call centre,
- By phone,
- By official documents,
- Electronic form (in-company application screen),
- In writing,
- Written form (company printed forms),
- Physically (in person),
- Through company applications,
- From other activities,
- Through seminars, Product Launches, events, etc.
- From other units,
- Through cargo,
- From Plaza Information centre,
- Through e-Invoice System,
- Through accounting software

and processed for the following legal reasons;

Legal Reason	Data Category
It is mandatory for the data controller to fulfil its legal obligations.	Identity, Finance, Communication
The processing of personal data of the parties to a contract is necessary, provided that it is directly related to the establishment or performance of a contract.	Identity, Finance, Communication, Customer Transaction, Visual and Audio Records, Transaction Security
Data processing is necessary for the establishment, exercise or protection of a right.	Physical Space Security, Identity, Communication
Explicit consent (If you give your explicit consent for your photo or video to be taken and shared at events)	Visual and Audio Recordings

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Legal Reason	Data Category
Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the relevant person.	Identity, Customer Transaction, Communication

## 2. PERSONAL DATA PROCESSING PURPOSES

Your personal data will be processed by the Company for the following purposes within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the “KVKK”:

Processing Purpose	Data Category
Execution of activities in accordance with legislation	Identity, Finance, Communication, Customer Transaction
Execution of finance and accounting activities	Identity, Finance, Communication, Visual and Audio Records, Customer Transactions
Execution of storage and archive activities	Identity, Finance, Communication, Physical Space Security, Visual and Audio Records, Transaction Security
Providing the security of data controller operations	Physical Space Security
Providing the security of movable assets and resources	Physical Space Security
Execution of risk management processes	Physical Space Security
Providing physical space security	Physical Space Security
Execution of communication activities	Identity, Customer Transaction, Communication, Visual and Audio Records, Finance
Receiving and evaluating suggestions for improving business processes	Identity, Customer Transaction, Communication
Following up requests/complaints	Identity, Customer Transaction, Communication
Execution and auditing business activities	Identity, Communication, Customer Transaction, Transaction Security
Execution of contract processes	Identity, Communication, Visual and Audio Records, Finance, Customer Transaction, Transaction Security
Execution of information security processes	Identity, Communication, Transaction Security
Execution of marketing processes	Identity, Communication, Visual and Audio Records
Organization and event management	Identity, Communication, Visual and Audio Records
Execution of Customer Loyalty Processes	Identity, Communication, Visual and Audio Records

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Processing Purpose	Data Category
Execution of customer relationship management processes	Identity, Communication, Visual and Audio Records, Customer Transactions
Execution of Sales processes	Identity, Communication, Visual and Audio Records, Finance, Customer Transactions
Execution of Goods / Services Production and Operation Processes	Identity, Communication, Visual and Audio Records, Customer Transactions
Execution of After Sales Support activities	Identity, Contact, Customer Transaction
Carrying out activities for customer satisfaction	Identity, Contact, Customer Transaction
Execution of Access Authorizations	Transaction Security

### 3. TO WHOM AND FOR WHAT PURPOSE CAN YOUR PERSONAL DATA BE TRANSFERRED

Your personal data may be transferred to the third parties listed below for the specified purposes, within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the “KVKK”:

3rd Party	Data Category	Transfer Purpose
Authorized Public Institutions and Organizations	Physical Space Security, Identity, Communication, Finance, Customer Transactions, Visual and Audio Records	Providing information to authorized persons, institutions and organizations, following up and carrying out legal affairs, carrying out activities in accordance with the legislation.
Related Suppliers	Identity, Communication, Transaction Security, Customer Transaction	Conducting and Auditing Business Activities
Independent Audit Company	Identity, Communication, Finance, Customer Transaction	Conducting and Auditing Business Activities
YMM (Certified Public Accountant CPA), SMM (CPA Freelance Financial Advisor)	Identity, Communication, Finance	Conducting Finance and Accounting Affairs
Related Customers	Identity, Communication, Finance, Visual and Audio Records	Execution of Contract Processes
Contracted Cargo Company	Identity, Communication	Execution of Communication Processes
On Public Social Media Accounts	Visual and Audio Records	Execution of Company / Product / Service Loyalty Processes, Organization and Event Management.

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#### 4. YOUR RIGHTS AS A PERSONAL DATA OWNER

Within the scope of Article 11 of the Personal Data Protection Law No. 6698 (“KVKK”), persons whose Personal Data is collected have the right to apply to our Company for the following matters:

- To learn whether their personal data has been processed,
- To request information about their personal data if it has been processed,
- To learn the purpose of processing their personal data and whether it is used in accordance with its purpose,
- To know the third parties to whom their personal data has been transferred domestically or abroad,
- To request correction of their personal data if it has been processed incompletely or incorrectly,
- To request the deletion or destruction of their personal data within the framework of the conditions stipulated in Article 7 of the Law,
- To request that the transactions made pursuant to subparagraphs (d) and (e) of Article 11 of the Law be notified to third parties to whom their personal data has been transferred,
- To object to the emergence of a result against the person by analysing the processed data exclusively through automated systems,
- To request compensation for the damages incurred due to the processing of their personal data in violation of the “KVKK”.

**As the relevant Person, you can submit your applications regarding your rights listed above**

by filling out the Application Form on our website [VBT Software - Ethical Principles and Policies](#) by using the methods specified in the application form.

Depending on the nature of your request, your applications will be finalized free of charge as soon as possible and within thirty days at the latest; however, if the transaction requires an additional cost, you may be charged a fee according to the tariff determined by the Personal Data Protection Board.