

	SUPPLIER DISCLOSURE TEXT	Document No:	KVK.F014
		Effective Date:	01.10.2021
		Revision No:	03
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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 suppliers 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 specified below is collected in accordance with the relevant legislation through the following methods;

- By e-mail,
- By official documents,
- Verbal,
- In writing,
- Physically (in person),
- Through company applications,
- Through E-Government and Public Applications,
- Through cargo,
- From Plaza Information centre,
- Through e-Invoice System,
- Through accounting software

and processed for the following legal reasons;

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, Communication, Audio visual Records, Finance, Legal Proceedings
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, Communication, Finance

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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
Providing Information to Authorized Persons, Institutions and Organizations	Identity, Communication, Audio Visual Records, Finance, Legal Proceedings
Monitoring and Execution of Legal Affairs	Identity, Communication, Audio Visual Records, Finance, Legal Proceedings
Execution of activities in accordance with legislation	Identity, Communication, Audio Visual Records, Finance, Legal Proceedings
Execution of contract processes	Identity, Finance, Communication
Execution and Auditing of business activities	Identity, Finance, Communication
Execution of Communication activities	Identity, Finance, Communication
Executing Purchasing Processes	Identity, Finance, Communication
Conducting Business Continuity Activities	Identity, Finance, Communication
Execution of finance and accounting activities	Identity, Finance, Communication
Execution of storage and archive activities	Identity, Finance, Communication
Execution of risk management processes	Identity, Finance, Communication
Execution of Sales processes,	Identity, Finance, Communication
Execution of After Sales Support activities	Identity, Finance, Communication
Execution of product development processes	Identity, Finance, Communication

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	Identity, Communication, Audio Visual Records, Finance, Legal Proceedings	Providing information to authorized persons, institutions and organizations
Courts, Lawyers	Identity, Communication, Audio Visual Records, Finance, Legal Proceedings	Monitoring and Execution of Legal Affairs, Carrying out activities in accordance with legislation
Independent Audit Company	Identity, Communication, Audio Visual Records, Finance, Legal Proceedings	Execution and Auditing of business activities

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3rd Party	Data Category	Transfer Purpose
YMM (Certified Public Accountant CPA), SMM (CPA Freelance Financial Advisor)	Identity, Communication, Finance	Conducting Finance and Accounting Affairs
Banks	Identity, Communication, Finance	Conducting Finance and Accounting Affairs
Contracted Cargo Company	Identity, Communication	Execution of Communication Processes

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.