

HİTİT BİLGİSAYAR HİZMETLERİ ANONİM ŞİRKETİ
NEWSLETTER SUBSCRIPTION
PRIVACY NOTICE

a) Data Controller

Your personal data may be processed by Hitit Bilgisayar Hizmetleri Anonim Şirketi (“**Company**” or “**Hitit**”) as the data controller in accordance with the Personal Data Protection Law No. 6698 (“**Law**”) within the scope specified below.

b) Your Personal Data Collected

Your personal data listed below may be processed within the scope of the conduct of our Company’s activities.

Personal Data Category	Specific Personal Data
Identity Information	Full name
Contact Information	mobile phone number, e-mail address

c) Purposes and Legal Grounds for Processing Personal Data

The collected personal data may be processed for the following purposes (“**Purposes**”) and legal grounds and within the scope of the personal data processing conditions and purposes specified in Articles 5 of the Law.

Personal Data Categories	Purposes of Personal Data Processing	Legal Grounds
<ul style="list-style-type: none">• Identity Information• Contact Information	<ul style="list-style-type: none">• Fulfilling the requests of official authorities,• Providing information to the competent official authorities pursuant to the legislation,• Ensuring compliance with the retention obligations stipulated in the legislation,• Responding to data subject requests in accordance with the legislation and taking necessary actions	<i>Based on the legal reason that it is clearly stipulated by law and is mandatory for the data controller to fulfill its legal obligation</i>
<ul style="list-style-type: none">• Identity Information• Contact Information	<ul style="list-style-type: none">• Enabling your subscription to our newsletter through completing the newsletter subscription form during your visit to the Company’s website and carrying out the necessary operational processes by the Company,• Carrying out information security processes	<i>Based on the legal ground that processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject</i>
<ul style="list-style-type: none">• Identity Information• Contact Information	<ul style="list-style-type: none">• Sending commercial electronic messages such as advertisements, promotions and informational	<i>Based on your explicit consent</i>

	communications within the scope of the newsletter.	
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d) Recipient Parties and Purposes for Transferring Personal Data

Your personal data may be transferred within the scope of the data processing conditions set out in Article 5 of the Law, in compliance with the rules regarding the transfer of personal data specified in Article 8 of the Law.

Recipients / Recipient Groups	Legal Ground and Purpose of Transfer
<ul style="list-style-type: none"> Our suppliers from whom we receive services (refers to all third-party service providers from whom goods and services are procured for the provision of our services and the conduct of our activities) 	<p>Based on the legal grounds underlying the above-mentioned Purposes, within the scope of the fulfillment of such Purposes</p> <ul style="list-style-type: none"> The procurement by our Company of consultancy, information security, archiving, and support services for the fulfillment of the above-mentioned Purposes
<ul style="list-style-type: none"> Our business partners (refers to the parties with whom we have a cooperation or business partnership relationship) 	<p>Based on the legal ground that processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject</p> <ul style="list-style-type: none"> Conduct of our business activities, Follow-up and conduct of legal processes
<ul style="list-style-type: none"> Legally authorized public institutions and legally authorized private organizations (refers to private and public institutions and organizations authorized to request information and documents due to the relevant legal regulations or legal processes, private and public institutions and organizations to which the transfer of information is mandatory pursuant to legal regulations, and private and public institutions and organizations with which we verify information in order to ensure the security of legal transactions) 	<p>Based on the legal reason that it is clearly stipulated by law and is mandatory for the data controller to fulfill its legal obligation</p> <ul style="list-style-type: none"> Fulfillment of legal reporting and information requests, Conduct of legal audit activities, Execution of legal processes, Fulfillment of our obligations arising from legislation
<ul style="list-style-type: none"> To third parties from whom services are obtained for the purpose of conducting communication and promotional activities 	<p>Based on the standard contractual clauses published by the Personal Data Protection Board</p> <ul style="list-style-type: none"> Conducting communication and promotional activities

e) Method for the Collection of Personal Data

Your personal data are collected in electronic form through the website, e-mail, and the Company's internal systems within the scope of the fulfillment of the above-mentioned Purposes.

f) Data Subject's Rights Specified under Article 11 of the Law

If as the data subject you submit your requests regarding your rights listed under article 11 of the Law to our Company through the methods set out below, our Company will finalize such requests free of charge as soon as possible and, in any event, within thirty (30) days, depending on the nature of the request. However, if the transaction requires an additional cost, the fee set out in the tariff determined by the Personal Data Protection Board shall be charged by our Company. In this context, pursuant to Article 13(1) of the Law, you may submit your request regarding the exercise of your rights specified above to our Company in writing or through other methods to be determined by the Personal Data Protection Board in the future. Within this framework, the channels and procedures through which you may submit your applications to our Company in writing pursuant to Article 11 of the Law are explained below.

In order to exercise your rights specified above, a sample of which is available at <https://hitit.com/themes/hitit/documents/2026-02/ilgili-kisi-basvuru-formu.pdf> :

- the wet-signed copy of the Data Subject Application Form may be submitted to Hitit by sending it to “Hitit Bilgisayar Hizmetleri A.Ş. Reşitpaşa Mah. Katar Cad. No:4/1 Arı Teknokent 2 Inner Door No:601 Maslak 34469 Sarıyer İstanbul” via a notary public or in writing, by using a registered electronic mail (KEP) address, secure electronic signature, mobile signature, or the electronic mail address previously notified by the data subject to the data controller and registered in the data controller’s system to Hitit.