

PERSONAL DATA PROTECTION NOTICE

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This English version is provided for information purposes. In the event of any discrepancy between the Turkish and English versions, the Turkish version shall prevail.

1. Data Controller

1.1 Pursuant to Turkish Law No. 6698 on the Protection of Personal Data ("KVKK"), your personal data are processed, within the scope described in this Notice, by Berke FİNCANCI – AnkSOFT Bilişim ve Telekomünikasyon Hizmetleri ("AnkSOFT"), residing at Büyükesat Mah. Çiçekdağ Sk. Cam Apt. No:12 İç Kapı No:4 Çankaya/Ankara, with tax identification number 3880464628 at Cumhuriyet Tax Office, in its capacity as data controller.

1.2 This Notice applies to AnkSOFT customers, prospective customers, visitors to www.anksoft.net and persons who contact AnkSOFT.

2. Categories of Personal Data Processed

2.1 Depending on the nature of the service provided, the following categories of personal data may be processed by AnkSOFT:

- Identity: first name, surname, Turkish identity number, image of identity document (where identity verification is requested);
- Contact: e-mail address, telephone number, full address, community and messaging platform username;
- Customer Transaction: order, service, invoice and payment records, support tickets and correspondence, customer feedback and reviews;
- Financial: tax office, tax number, company name, billing information, payment transaction records (card details are neither seen nor stored by AnkSOFT);
- Transaction Security: IP address, session and access logs, browser and device information, approximate location information based on IP address, security verification records;
- Marketing: communication preferences, cookie data, response to "How did you hear about us?".

2.2 You are kindly requested to redact special categories of personal data, such as blood group, from identity documents submitted for identity verification purposes. Where such data are nevertheless submitted, they shall not be processed for any purpose.

2.3 The Customer is the data controller in respect of data hosted by the Customer on the server, hosting and game server services it rents; AnkSOFT acts solely as a technical infrastructure provider in respect of such data.

3. Purposes of Processing Personal Data

3.1 Your personal data are processed for the following purposes:

- the conclusion and performance of the service agreement, the receipt of orders, and the set-up and delivery of services;
- the conduct of invoicing, payment and collection processes;
- the provision of customer support services, and responding to requests and complaints;

- identity and account verification; the prevention of payment fraud, fake accounts and abuse;
- ensuring information and infrastructure security, and detecting and preventing cyber attacks;
- fulfilling obligations arising under Tax Procedure Law No. 213, Law No. 5651 and related legislation; responding to requests from competent public institutions and organisations;
- measuring and improving service quality, and conducting statistical analyses;
- where you have given your explicit consent, sending campaign, promotional and informational messages;
- the establishment, exercise and protection of rights in legal disputes.

4. Method and Legal Basis of Collecting Personal Data

4.1 Your personal data are collected in electronic form, by partially or fully automated means, through forms on www.anksoft.net and the Customer Panel, order and payment screens, support tickets, live support, e-mail, telephone and instant messaging channels, and cookies.

4.2 Your personal data are processed on the basis of the following legal grounds set out in paragraph 2 of Article 5 of the KVKK:

- processing is directly related to the conclusion or performance of a contract (sub-paragraph (c));
- processing is necessary for the data controller to fulfil its legal obligations (sub-paragraph (ç));
- processing is expressly provided for by law (sub-paragraph (a));
- processing is necessary for the establishment, exercise or protection of a right (sub-paragraph (e));
- processing is necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject (sub-paragraph (f)).

4.3 With respect to marketing communications and occasional transfers abroad within the scope of Clause 7.3, your personal data are processed on the basis of your explicit consent pursuant to paragraph 1 of Article 5 of the KVKK. You may withdraw your explicit consent at any time.

4.4 Data obtained through cookies used for the operation and security of the website, the generation of usage statistics and the provision of the live support service are processed on the legal grounds of performance of a contract and legitimate interest set out in Clause 4.2. You may delete or block cookies at any time through your browser settings; in that case some features of the website may not work as expected.

5. Processing by Artificial Intelligence and Automated Systems

5.1 AnkSOFT may make use of artificial intelligence and automated data processing systems for the purposes of classifying support tickets, preparing draft responses and responding to tickets, assessing the priority of requests and customer satisfaction, detecting spam, fraud and abuse, and analysing service quality, limited to the purposes set out in Clause 3.

5.2 Within this scope, support tickets, correspondence and the customer transaction data necessary for assessing a request may be processed. Such processing is carried out primarily by systems running on AnkSOFT's own infrastructure; where third-party artificial intelligence service providers are used, data are transferred in accordance with the provisions of Clause 7 and limited to what is necessary for the purpose.

5.3 Decisions producing legal effects, such as the suspension of a service, the termination of an agreement or the rejection of refund requests, are not taken solely by automated systems; such decisions are reviewed by authorised AnkSOFT personnel. Your right to object to any outcome adverse to you arising from the analysis of your personal data exclusively by means of automated systems is reserved.

5.4 Bearing in mind that responses prepared by artificial intelligence systems may contain errors, you may request confirmation from authorised AnkSOFT personnel on matters producing legal or financial consequences.

6. Transfer of Personal Data Within Türkiye

6.1 Your personal data may be transferred, for the purposes set out in Clause 3 and in accordance with Article 8 of the KVKK, to the following groups of recipients:

- payment institutions and banks (for the purpose of carrying out payment and collection transactions);
- e-invoice and e-archive service providers, financial advisers and accounting service providers;
- domain name registries and, for domain names with the ".tr" extension, TRABİS;
- data centre, communications infrastructure, SMS and telephone service providers;
- legal advisers and lawyers;
- competent public institutions and organisations, and judicial and administrative authorities, upon their request.

7. Transfer of Personal Data Abroad

7.1 As some of the services offered by AnkSOFT are performed through infrastructure and service providers located abroad, your personal data may be processed abroad and may be transferred abroad, in accordance with Article 9 of the KVKK, to the following recipients and for the following purposes:

- data centres and server rental, hosting and infrastructure service providers located abroad (for the purpose of hosting and operating the website, the Customer Panel and AnkSOFT's other information systems and backups, and of performing dedicated server, game server and other services provided at locations abroad);
- domain name registries, registrars and international domain name authorities established abroad (for the purpose of performing domain name registration, renewal and transfer operations);
- web analytics and third-party sign-in service providers (for the purpose of generating website usage statistics and providing the third-party account sign-in feature);
- live support service providers (for the purpose of providing the live support service);
- internal team communication and notification platforms (for the purpose of relaying internal team notifications relating to support tickets and orders);
- cloud, e-mail and artificial intelligence service providers (for the purpose of the processing operations within the scope of Clause 5 and the provision of services).

7.2 Personal data hosted on servers located abroad that AnkSOFT owns or rents remain under AnkSOFT's exclusive management and access control. Data centre and server rental service providers are not granted logical access to such data; the data are protected by appropriate technical and organisational measures, including encryption, and are not disclosed to third parties in this context. AnkSOFT continues to process such data abroad in accordance with this Notice and the provisions of the KVKK.

7.3 Transfers of personal data to third parties located abroad are carried out pursuant to Article 9 of the KVKK: where an adequacy decision or appropriate safeguards exist, on that basis; otherwise, pursuant to paragraph 6 of that Article, on the grounds that the transfer is necessary for the performance of the contract between you and AnkSOFT (such as your choice of a service at a foreign location or the registration of a domain name), that it is necessary for the implementation of pre-contractual measures taken at your request, or on your explicit consent given after being informed of the possible risks (such as third-party account sign-in).

7.4 Please note that personal data transferred abroad will be subject to the legislation of the country to which they are transferred, and that the level of protection in that country may not be the same as in Türkiye.

7.5 AnkSOFT may host, store and process all of its information systems, including its website, Customer Panel, databases, e-mail, backup and support systems, together with all personal data processed in those systems, including personal data relating to its customers, on servers and infrastructure that it owns or rents,

whether located in Türkiye or abroad, within the limits of the purposes set out in Clause 3. The provisions of this Clause and the safeguards provided for in Article 9 of the KVKK shall also apply to the processing and hosting of personal data abroad.

8. Retention Period of Personal Data

8.1 Your personal data are retained for the period required by the purpose of processing and for the periods prescribed by the relevant legislation. In this context, the principal retention periods are as follows:

- invoice, accounting and commercial records: 10 (ten) years pursuant to Tax Procedure Law No. 213 and Turkish Commercial Code No. 6102;
- contract and customer transaction records: 10 (ten) years from the termination of the contract, being the general limitation period;
- traffic and access logs: for the period prescribed by Law No. 5651 and the related regulations;
- images of identity documents: from the completion of the verification process, for the period necessary for potential dispute and fraud investigations.

8.2 Personal data whose retention period has expired are erased, destroyed or anonymised in accordance with the Regulation on the Erasure, Destruction or Anonymisation of Personal Data.

9. Data Security

9.1 Pursuant to Article 12 of the KVKK, AnkSOFT takes the necessary technical and administrative measures to ensure an appropriate level of security in order to prevent the unlawful processing of and access to personal data and to ensure their safekeeping. These measures include encrypted connections (TLS), access authorisation, multi-factor authentication for administrator access, storage of passwords in irreversible form, and the keeping of access logs.

9.2 Should the personal data processed be obtained by others through unlawful means, AnkSOFT shall notify the data subject and the Personal Data Protection Board of the situation as soon as possible.

10. Your Rights as a Data Subject

10.1 Pursuant to Article 11 of the KVKK, by applying to AnkSOFT, you may:

- learn whether your personal data are being processed;
- request information in this regard if your personal data have been processed;
- learn the purpose of processing your personal data and whether they are used in accordance with that purpose;
- know the third parties, within Türkiye or abroad, to whom your personal data are transferred;
- request the rectification of your personal data if they have been processed incompletely or inaccurately;
- request the erasure or destruction of your personal data within the framework of the conditions set out in Article 7 of the KVKK;
- request that the rectification, erasure and destruction operations be notified to third parties to whom your personal data have been transferred;
- object to any outcome adverse to you arising from the analysis of the processed data exclusively by means of automated systems;
- claim compensation for damage in the event that you suffer damage due to the unlawful processing of your personal data.

Accordingly, you have the rights listed above.

11. Method of Application

11.1 In accordance with the Communiqué on the Procedures and Principles of Application to the Data Controller, you may submit, using the application form available at www.anksoft.net/sozlesme/anksoft-kvkk-application-form-en.pdf, your requests concerning your rights, together with information identifying you, in writing to the address specified in Clause 1.1, or send them to hukuk@anksoft.net from the e-mail address registered in AnkSOFT's systems, via a registered electronic mail (KEP) address, or with a secure electronic signature or mobile signature.

11.2 Your applications shall be concluded free of charge as soon as possible, depending on the nature of the request, and within 30 (thirty) days at the latest. Where the process requires an additional cost, the fee set out in the tariff determined by the Personal Data Protection Board may be charged.

11.3 In the event that your application is rejected, the response given is found insufficient, or no response is given in due time, your right to lodge a complaint with the Personal Data Protection Board pursuant to Article 14 of the KVKK is reserved.

12. Updates

12.1 AnkSOFT may update this Notice in line with changes in legislation and changes in its data processing activities. The current version is published at www.anksoft.net and enters into force on the date of publication.