

PRIVACY POLICY AND PERSONAL DATA POLICY

Update Date: May 2022

This Privacy Policy and Personal Data (**Policy**), has been prepared in order to clarify and inform the visitors about the terms and conditions regarding the use of data obtained and/or to be obtained from online visitors in any way through the website operating under the domain name www.ilab.com.tr owned by iLab Holding Anonim Şirketi (**iLab or Company**) and the general personal data processing policies and principles of iLab Holding.

1. Definitions and General Explanations

Each term referred to in this Policy shall have the meanings assigned next to them:

Website: The website with the domain name www.ilab.com.tr managed by iLab and its extensions.

Visitor(s): The natural person who uses the Website without making any registration.

Data Subjects(s): Natural persons whose personal data are processed.

Law: Personal Data Protection Law No. 6698.

Policy: This Privacy Policy and Personal Data Text.

Capitalized terms not defined in this Policy shall have the meanings in the Law.

iLab adopts this Policy in respect of privacy, use and other related issues of the information regarding visitors accessing the Website. iLab places importance on the confidentiality of data and takes care to be transparent about data retention. This Policy is the privacy policy that includes information about what kind of data is collected, how this data is used, with whom this data is shared if necessary, the rights regarding personal data and how these rights can be used, and the principles adopted by iLab regarding confidentiality.

Personal data are processed in line with the below mentioned basic principles as regulated in the Law:

- Being in accordance with law and good faith,
- Being accurate and up-to-date when necessary,
- Being processed for specific, explicit and legitimate purposes,
- Being connected, limited and prudent to the purpose for which they are processed; and
- Being stored for the period stipulated in the relevant legislation or the period required for the purpose for which they are processed.

Personal data refers to any information regarding an identified or identifiable natural person. Thus, the regulations regarding the personal data contained in this text shall apply if the relevant information belongs to a natural person. If the relevant information belongs to legal persons, provisions excluding those regarding personal data in this Policy shall apply.

Website may contain links to other websites whose content is not created and controlled by iLab. These linked websites may contain different terms and conditions than the texts of iLab. iLab shall not bear responsibility for the use or disclosure of information that these websites process. Likewise, iLab shall not bear any responsibility when a link is provided to Website belonging to iLab from other websites.

2. Enlightening and Informing Data Subject

iLab is obliged to enlighten/inform Data Subjects whose data will be processed during the acquisition of personal data pursuant to Article 10 of the Law. The scope of this clarification obligation is as follows:

- The identity of the data controller and of its representative, if any,
- The purpose of processing of personal data,
- To whom and for which purposes the processed personal data may be transferred,
- The method and legal basis of collection of personal data,
- Rights of the data subject,

With this Policy, iLab aims to provide the necessary information for the Website Visitors and to explain the general data processing principles and values of iLab.

3. Collection of Personal Data, Collection Method and Legal Reasons

The information that Data Subject send, share and/or provide in accessible form to iLab while accessing the Website, or that are collected through the Website by automatic means, may be included in the scope of personal data. If you use the services offered by iLab or access the Website, we may collect the following information about you:

Usage data: Every time you use our services or access the Website without making use of it, usage data related to you is collected. Your visit of the Website, what you click on, when you perform these actions, etc. may be included in this. It also includes data on the nature of each access, such as source IP addresses, internet service providers, files displayed on the Website (e.g. HTML pages, graphics, etc.), operating system versions and timestamps.

Device data: Data such as your IP address, operating system version, device type, system and performance information, and browser type are collected from the devices and applications you use to access our services.

a) Data Categories and Data Types

The Personal Data of our Website visitors that can be processed are Process Security data. In this context, we can process process security data, such as PC/device information, internet traffic data (network movements, IP address, visit data, time and date information), data collected through cookies and general location information, and information about the website to which the visitor is directed, if any.

b) Legal Reasons and Purposes of Processing

Your above-mentioned personal data shall be processed in accordance with the conditions and principles in Article 4 of the Law and data processing conditions in Article 5 and 6 of the Law. In this context, we process process security data of our visitors when processing is expressly stipulated by the law and processing is necessary for our legitimate interests, provided that the fundamental rights and freedoms of data subjects are not harmed.

In addition, we process your personal data for the following purposes:

- Conducting information security processes
- Conducting supervision / ethical activities

- Conducting access authorization
- Conducting / audit of business activities
- Conducting business continuity activities
- Informing authorized persons, authorities, and organizations

4. Administrative and Technical Measures Taken for Protection of Personal Data

iLab's main mission is to take all necessary administrative and technical measures and to show due diligence in order to ensure the confidentiality, integrity and security of your personal data. In this context, it takes the necessary measures to prevent unlawful processing of personal data, unauthorized access to personal data, unlawful disclosure, modification, or destruction of personal data.

5. Transfer of Personal Data

Your collected personal data may be transferred, processed, and stored to servers of our third-party suppliers for the purposes of storing or for the legal purposes stipulated in this text. In this context, process security data may be shared with authorized institutions upon request and stored in suppliers' system from which server services are provided for carrying out storage and archiving activities.

iLab undertakes to make every effort to comply with the obligations stipulated in the relevant legislation while performing this operation.

6. Cookies

Cookies are very small text files, that we store on the device you use to access our services so that we can recognize regular users.

iLab has a separate cookie policy regarding the cookie files that can be stored on the devices of the Website visitors. For cookies that iLab can use on the Website and detailed information about them, please review the [Cookie Policy](#).

7. Rights of Data Subject

You have the following rights, in accordance with the personal data protection legislation:

- to learn whether your personal data is processed,
- to request information on the processing of your personal data,
- to learn the purpose of the processing of your personal data and whether it is used within the intended purposes,
- to know the third parties to whom your personal data is transferred in domestic or abroad,
- to request the rectification of the incomplete or inaccurate data, if any,
- to request the erasure or destruction of your personal data under the conditions stipulated in Law,
- to request notifying third parties to whom the personal data has been transferred, that your personal data that has been processed incompletely or incorrectly has been corrected or that your personal data has been deleted or destroyed,
- to object to the processing, exclusively by automatic systems, of your personal data, which leads to an unfavorable consequence for you,
- to request compensation for the damage arising from the unlawful processing of your personal data.

As Data Subjects, in order to submit your requests regarding your rights and to exercise your rights over your personal data; you can file your request in a way that meets the minimum application conditions in the Communique on The Principles And Procedures For The Request To Data Controller and take actions such as making necessary changes, updates and/or deletion and related requests by sending an e-mail to iLab's e-mail address or by sending to iLab's physical address stated below.

The application you will submit to use the rights you have as data subject that contain your explanations regarding the right you want to use must be clear and understandable, the subject you request should be related to yourself or if you are acting on behalf of someone else, you must be specifically authorized in this regard and document your authority, and the application must meet the minimum application requirements specified in the Communique on The Principles And Procedures For The Request To Data Controller regulations.

If you submit your requests to us through the specified methods, iLab will conclude the request free of charge as soon as possible and within thirty days at the latest, depending on the nature of your request. However, if the transaction requires an additional cost, the fee determined by Personal Data Protection Board will be charged by iLab.

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