https://www.akumsan.com.tr/

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA BY MEANS OF COOKIES THROUGH THE WEBSITE

1. THE PERSON PROCESSING YOUR DATA (DATA CONTROLLER)

As AKÜMSAN AKÜ MALZEMELERİ VE ARAÇ DÖNÜŞÜM TEKNOLOJİLERİ ANONİM ŞİRKETİ ***("Akümsan" or the "Company")***, we attach the utmost importance to ensuring the security of your personal data. Accordingly, in the processing of your personal data and its transfer to third parties pursuant to the Personal Data Protection Law No. 6698 ***(the "KVK Law")***, we take the measures necessary to ensure an appropriate level of security in order to prevent the unlawful processing of and unlawful access to your personal data and to ensure its safekeeping. Mindful of this responsibility, we process your personal data in our capacity as Data Controller under the KVK Law and the related legislation, within the framework set out below.

2. YOUR PERSONAL DATA PROCESSED

Within the framework described above, the types of cookies running on our website https://www.akumsan.com.tr/ and your personal data processed by means of cookies are listed below:

Digital Data	Strictly Necessary Cookies, Functional Cookies, Performance / Analytics Cookies, Advertising / Marketing Cookies, IP address, Browser and Device Information, Cookie Preference Records

More detailed information on this cookie data is available in the "Cookie Information List" in the final section of this notice.

3. METHOD OF COLLECTION OF YOUR PERSONAL DATA

In line with the KVK Law and secondary legislation, your personal data is collected within the scope of the activities carried out through the website https://www.akumsan.com.tr/ operated by our Company, **by automated means** and **by means of cookie technologies**.

The relevant cookies operate for purposes such as understanding visitors' browsing behaviour on the website, managing sessions, performing statistical measurement and personalising the user experience; all cookies other than strictly necessary cookies are activated only **on the basis of your explicit consent**.

Accordingly, your personal data is collected and processed by the methods set out below:

- Through the cookies used on the website via your browser,
- By recording the preferences made through the CerezGo Cookie Management Panel,
- By collecting log data such as IP address, session duration and pages viewed.

The data collected is processed, within the framework of the legal bases set out in Articles 5 and 6 of the KVK Law, solely for the purposes of providing the services falling within the Company's field of activity, operating the website in a secure and functional manner and improving the user experience.

4. PROCESSING PURPOSES AND LEGAL BASES OF YOUR PERSONAL DATA

Your personal data set out above is processed by our Company for the following purposes and on the following legal bases:

A. Strictly Necessary Cookies

Purpose:

- Ensuring that the website operates securely,
- Managing user sessions and performing form security code (captcha) verification,
- Preventing system errors and meeting technical requirements that directly affect the user experience,
- Maintaining basic functions by remembering the user's language preference and cookie preferences.

Legal Basis:

- KVK Law Art. 5/2-c: "Processing of personal data belonging to the parties to a contract is necessary, provided that it is directly related to the establishment or performance of that contract"
- KVK Law Art. 5/2-f: "Processing is necessary for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the data subject are not harmed"

B. Performance, Analytics and Functional Cookies

Purpose:

- Analysing visitor behaviour,
- Measuring the performance of the website,
- Detecting errors and properly conducting improvement and development processes,
- Reporting user habits based on page view and session information,
- Running embedded content on the website such as Google Maps and improving the user experience.

Legal Basis:

- KVK Law Art. 5/1: "The explicit consent of the data subject"

Note: Such cookies are used only upon obtaining the explicit consent of the data subject and are not run in any way if consent is not given.

C. Advertising and Marketing Cookies

Purpose:

- Displaying content and advertisements tailored to the user's interests,
- Measuring the effectiveness of advertising campaigns,
- Carrying out targeted promotion in line with user preferences,
- Providing data to the third-party provider's advertising personalisation processes through embedded third-party content (Google Maps).

Legal Basis:

- KVK Law Art. 5/1: "The explicit consent of the data subject"

Note: Such cookies are likewise never activated without explicit consent, and consent may be withdrawn by the user at any time.

In addition, this data of yours is processed for the purposes of:

- The Company's need for your personal data, such as your IP address, in order to fulfil its legal and contractual obligations, in particular those arising from Law No. 5651 on the Regulation of Publications on the Internet and Combating Crimes Committed by Means of

Such Publications and the Regulation on the Procedures and Principles for the Regulation of Publications on the Internet,

- Ensuring the security of the Company's and visitors' network traffic,
- Conducting activities in compliance with the legislation, following up and conducting legal affairs, conducting / auditing business activities, obtaining and evaluating suggestions for the improvement of business processes, conducting business continuity activities, ensuring the security of data controller operations, providing information to authorised persons, institutions and organisations, conducting management activities, and creating and monitoring visitor records.

and on the corresponding legal bases, limited to these purposes.

For cookies used on our website other than strictly necessary cookies, the explicit consent of users is obtained and users are given the opportunity to change their consent at any time. Through the cookie management panel, users can view the types of cookies used on our website and set their preferences using the "on" or "off" options for all cookies other than strictly necessary cookies. Users can likewise change their preferences at any time through this panel.

Your personal data set out above is kept with great care and in compliance with the provisions of the legislation, by taking all administrative and technical measures to ensure an appropriate level of security.

5. SHARING OF YOUR PERSONAL DATA

Your personal data obtained through non-essential cookies may be shared, solely for the processing purposes set out above and on the basis of your explicit consent, with the domestic and foreign technology suppliers from whom we receive services, analytics and advertising service providers (Google LLC / Google Ireland Limited in connection with the Google Analytics and Google Maps services, and CerezGo in connection with the cookie management service) and the business partners from whom we receive hosting/infrastructure services.

In addition, your personal data may be shared for the purpose of responding to duly made requests for information from authorised public institutions and organisations and within the scope of fulfilling our obligations arising from the legislation.

During data transfers, compliance with the conditions set out in Articles 8 and 9 of the KVK Law is ensured; cross-border transfers are carried out, pursuant to Article 9 of the KVK Law, where there is an adequacy decision, where one of the appropriate safeguards listed in the Law (such as a standard contract) is provided, or, in the case of incidental transfers, where the explicit consent of the data subject has been obtained.

6. DESTRUCTION OF YOUR PERSONAL DATA

Our Company retains your personal data only for as long as is necessary for the data processing purposes and limited to the retention periods prescribed in the relevant legislation. Personal data whose retention period has expired or whose processing purpose has ceased to exist is erased, destroyed or anonymised in accordance with Article 7 of the KVK Law and the provisions of the Regulation on the Erasure, Destruction or Anonymisation of Personal Data, in line with periodic destruction processes.

Your personal data obtained through cookies is also deactivated if you change your preferences through your browser settings or the cookie management panel, and the data on servers under our Company's control is erased or rendered non-functional by means of the relevant technical tools.

However, the destruction of persistent cookies placed by third-party providers (e.g. Google), over which our Company has no direct means of intervention, is subject to the data policies of the relevant third parties. Accordingly, users must direct their requests concerning third-party cookies to the relevant provider directly.

7. YOUR RIGHTS RELATING TO THE PROCESSING OF YOUR PERSONAL DATA

Under Article 11 of the KVK Law, you may submit the following requests to us by applying to our Company:

a) To learn whether your personal data is being processed and, if so, to request information in that regard,
b) To learn the purpose of the processing of your personal data and whether it is used in accordance with that purpose,
c) To know the third parties to whom your personal data is transferred, domestically or abroad,
d) To request the rectification of personal data that is incomplete or inaccurately processed,
e) To request the erasure, destruction or anonymisation of your personal data where the reasons requiring its processing have ceased to exist, within the scope of Article 7 of the KVK Law,
f) To request that the operations carried out pursuant to subparagraphs (d) and (e) be notified to the third parties to whom your personal data has been transferred,
g) To object to the occurrence of a result against you through the analysis of the processed data exclusively by means of automated systems,
h) To claim compensation for damage suffered as a result of the unlawful processing of your personal data.

You may exercise the rights listed above in accordance with the KVK Law, the Communiqué on the Procedures and Principles for Applications to the Data Controller published on 10.03.2018 and the relevant current legislation, by using the "Application Form Pursuant to the Personal Data Protection Law" available at https://www.akumsan.com.tr/images/files/akumsan_kvkk_kisisel_veri_sahibi_basvuru_formu.pdf and:

- Osmangazi Mahallesi Gazi Cadde No:19 Esenyurt/İSTANBUL by delivering it in person to this address, or by sending it through a notary public or by registered mail with return receipt,
- webcerez@akumsan.com.tr by sending it to this address from your e-mail address registered in our system,
- akumsan@hs02.kep.tr by sending it to this address via Registered Electronic Mail (KEP), signed with a secure electronic signature or mobile signature.

For a person other than the data subject to submit a request, a notarised special power of attorney issued by the data subject on the matter in the name of the person who will make the application must be provided.

Your requests duly submitted to our Company in this context will be concluded within thirty days at the latest. Where concluding such requests entails an additional cost, our Company will charge the applicant the fee set out in the tariff determined by the Personal Data Protection Board ***(the "Board")***. Where our Company responds to your application on a recording medium such as a CD or flash drive, a fee not exceeding the cost of the recording medium may be requested.

Our Company may request information from the data subject in order to determine whether the applicant is the owner of the personal data, and may address questions to the data subject regarding the application in order to clarify the matters stated therein.

Pursuant to Article 14 of the KVK Law, where the application is rejected, the response given is found insufficient or no response is given within the prescribed period, the data subject may lodge a complaint with the Board within thirty days from the date on which they learn of our Company's response and, in any event, within sixty days from the date of application.

8. COOKIE INFORMATION LIST

Strictly Necessary Cookies

These cookies are required for the website to function properly and enable the provision of basic services such as users' privacy preferences and session management.

Cookie Name	Provider	Description	Type	Retention Period
ASPSESSIONID*	Akümsan	Manages the visitor session on the server side; used for security code verification in contact, application and request forms.	First-Party	For the duration of the session
akumsan	Akümsan	Remembers the site language selected by the visitor (Turkish/English).	First-Party	14 days
cerezgo::local-storage::consent (local storage)	CerezGo	Stores the visitor's cookie preferences and consent record.	First-Party	Until the preference is changed or browser data is cleared

Performance and Analytics Cookies

Used to analyse visits to the website, understand user behaviour and produce statistical reports.

Cookie Name	Provider	Description	Type	Retention Period
_ga	Google Analytics	Assigns a unique identifier to distinguish visitors from one another.	Third-Party	13 months
_ga_0GF39PJNHQ	Google Analytics	Stores the session state and visit count for the Google Analytics 4 property.	Third-Party	13 months

Cookie Name	Provider	Description	Type	Retention Period
_gid	Google Analytics	Used to distinguish visitors over a 24-hour period.	Third-Party	1 day
_gat	Google Analytics	Limits the number of requests sent to the Google Analytics server.	Third-Party	1 minute

Functional Cookies

Enable embedded content on the website, such as Google Maps, to function and user preferences to be remembered.

Cookie Name	Provider	Description	Type	Retention Period
AEC	Google	Verifies that requests in a browsing session are made by the user; prevents malicious sites from acting on the user's behalf.	Third-Party	6 months
SEARCH_SAMESITE	Google	Protects against cross-site information leakage by restricting the cookie from being sent with cross-site requests.	Third-Party	6 months

Advertising and Marketing Cookies

Placed by Google through the embedded Google Maps content on the website; used for advertising personalisation and conversion measurement.

Cookie Name	Provider	Description	Type	Retention Period
NID	Google	Stores user preferences; used for advertising personalisation and statistics in Google services.	Third-Party	6 months
SNID	Google	Used for statistics, conversion measurement and advertising personalisation relating to Google services.	Third-Party	Period determined by the provider