

ecm

AN ERGUVAN PLATFORM

PRIVACY NOTICE

erguvan

PRIVACY NOTICE

Erguvan Karbon Denkleştirme Çözümleri Ticaret Anonim Şirketi ["Erguvan"] publishes a website for users who wish to use the Ecm services ["Services"] via <https://www.erguvan.co/>. Ecm is controlled by Erguvan, located in İstanbul, Türkiye, and operates in the scope of our Services under this Privacy Notice. Erguvan is the "data controller" of your personal data unless otherwise stated below.

This Privacy Notice applies whenever your personal data is processed as part of our Services, which means our services are operated by Erguvan who processes personal data. It describes how we process your personal data when providing these Services to you, and your rights and choices concerning your personal data. The Privacy Notice's sections are listed above.

1. Which of Your Personal Data is Processed, and What are the Purposes of Processing Your Personal Data?

A. Information About You That You Share with Us Directly

When you use Erguvan's Services as an employee/representative of our legal entity customer, you may give us personal data directly (for example, when creating an account on our Services), and we will store that personal data on our systems and process it for the purposes described in this Privacy Notice.

Depending on the Services, the personal data that we obtain will be relevant to providing those Services and include the following:

Personal Data	Legal Basis	Purposes of Processing Your Personal Data
<ul style="list-style-type: none"> Identification data (<i>first name and surname, ID number, or Taxpayer ID number</i>) Communication data (<i>e-mail address, telephone number, country, address</i>) Other (<i>company or organization name, sector, information on tax liability status, tax office affiliation information relating to request and complaint</i>) 	<ul style="list-style-type: none"> Necessary for the establishment or performance of the contract 	<ul style="list-style-type: none"> Providing and creating accounts in the Services, Execution of communication activities with the users for any request and complaint, Ensuring the information security of data controller operations, Execution of Erguvan's business activities and the Services, Execution of the Service operation processes.
<ul style="list-style-type: none"> Identification data (<i>first name and surname, ID number, or Taxpayer ID number</i>) Communication data (<i>e-mail address, telephone number, country, address</i>) 	<ul style="list-style-type: none"> The fulfillment of the data controller's legal obligations 	<ul style="list-style-type: none"> Protecting Erguvan's Rights, including compliance with applicable legal obligations, resolving any disputes we may have, and administering

<ul style="list-style-type: none"> • Other (<i>company or organization name, sector, information on tax liability status, tax office affiliation information relating to request and complaint</i>) 		<p>Erguvan's agreements with third parties,</p> <ul style="list-style-type: none"> • Ensuring the information security of the data controller's operations, • For security purposes to prevent potentially illegal activities, and to enforce the applicable Terms of Service.
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B. Information You Generate Using Erguvan's Services

When you choose to use communication features in Erguvan's Services to communicate, comment, or share information with other users in your team, then we will obtain personal data on what is commented or shared. This includes:

Personal Data	Legal Basis	Purposes of Processing Your Personal Data
<ul style="list-style-type: none"> • Your participation and comments in user comment boards 	<ul style="list-style-type: none"> • Necessary for the performance of the contract 	<ul style="list-style-type: none"> • Managing users' communications • Conducting business activities
	<ul style="list-style-type: none"> • Erguvan's legitimate interest in improving its Services and its website 	<ul style="list-style-type: none"> • Execution of activities for user satisfaction with Erguvan's Services, • Execution of activities to ensure business continuity.
	<ul style="list-style-type: none"> • Erguvan's legal obligations, in particular relating to security 	<ul style="list-style-type: none"> • Protecting Erguvan's rights, including compliance with applicable legal obligations, resolving any disputes we may have, and administering Erguvan's agreements with third parties, • Cooperating with public authorities and law enforcement where lawfully permitted or required.

At Ecm, you may benefit from various Services depending on the package you prefer, we may process your personal data in relation to you being Erguvan's customer. This includes:

Personal Data	Legal Basis	Purposes of Processing Your Personal Data
<ul style="list-style-type: none"> Customer data (<i>information related to the Service utilized by the customers, amount of expense, and package information</i>) 	<ul style="list-style-type: none"> Necessary for the establishment or performance of the contract 	<ul style="list-style-type: none"> Execution of Erguvan's business activities and the Services, Performance of the Terms of Service.
	<ul style="list-style-type: none"> The fulfillment of the data controller's legal obligations 	<ul style="list-style-type: none"> Protecting Erguvan's Rights, including compliance with applicable legal obligations, resolving any disputes we may have, and administering Erguvan's agreements with third parties, Ensuring the information security of the data controller's operations, For security purposes to prevent potentially illegal activities, and to enforce the applicable Terms of Service.

C. Cookies

We use necessary cookies to recognize you and/or your device(s) across Erguvan's Services. We explain why we do this, and how to control cookies in the applicable <https://ecm.erguvan.co/cookie-policy>.

We use necessary cookies to process personal data, including:

Personal Data	Legal Basis	Purposes of Processing Your Personal Data
<ul style="list-style-type: none"> IP address the type of device you are using your operating system version 	<ul style="list-style-type: none"> Necessary for the performance of the contract 	<ul style="list-style-type: none"> Conducting business activities Ensuring the security of data controller operations For security purposes and to prevent fraud or potentially illegal activities

<ul style="list-style-type: none"> • your mobile device's identifiers, like your MAC Address, • your browser type and language • referring and exiting pages and URLs • domain names • landing pages • pages viewed and the order of those pages 	<ul style="list-style-type: none"> • Erguvan's legal obligations, in particular relating to security, fraud detection and management 	<ul style="list-style-type: none"> • For security purposes and to prevent fraud or potentially illegal activities
	<ul style="list-style-type: none"> • Erguvan's legitimate interest in improving its Services and its website 	<ul style="list-style-type: none"> • Improving and optimizing Erguvan's Services and our users' experiences

2. Do We Transfer Your Personal Data to a Third-Party?

Your personal data may be transferred to

- Cloud service providers located in Frankfurt / London for the purposes of having hosting services, conducting business activities, carrying out information security processes, ensuring information management,
- Authorized persons, institutions, and organizations on the legal basis that the data controller can fulfill its legal obligation for the purposes of carrying out the activities in compliance with the legislation, providing information to authorized persons, institutions, and organizations, and following up and executing legal affairs.

3. Your Rights

Regarding your personal data, you have the right to:

- Request information on whether your personal data is processed or not,
- Request information regarding the processing of your personal data if it has been processed,
- Receive information on the purposes of processing your personal data and whether your personal data is used in compliance with these purposes of processing,
- Know the third parties in the country or abroad to whom your personal data is transferred.
- Rectification of your personal data in the event of incomplete or inaccurate processing of your personal data,
- Demand the erasure or destruction of your personal data under the conditions stipulated in the applicable Personal Data Protection Law.
- Request a notification to the third-parties to whom your personal data was transferred in cases when you demand the rectification, erasure, or destruction of your incomplete or inaccurate personal data,
- Claim compensation for the damage arising from the unlawful processing of your personal data,

4. How to Exercise Your Rights

If you wish you can deliver your requests and appeals regarding the processing of your personal data with a <https://ecm.erguvan.co/data-subject-application-form> ;

- By applying to Erguvan with a valid identity card directly,
- By sending the application form to the Erguvan address “*Orjin Maslak İş Merkezi, Eski Büyükdere Cad. No:27, Zemin Kat Sarıyer, İstanbul, Türkiye*” together with wet signature and ID photocopy,
- By sending the application form signed by secure e-signature or mobile signature to the e-mail address support@erguvan.co that belongs to Erguvan,
- By sending the signed application form via your registered electronic mail (REM) to the registered electronic address erguvankarbon@hs01.kep.tr that belongs to Erguvan.

The application of the Data Subject must contain the name, surname, signature if the application is in writing, identification number, (passport number if the applicant is a foreigner), residence or business address for notifications, e-mail address for notification, telephone number, and fax number, if any, and information on the subject of the request.

The Data Subject must express clearly and understandably what is requested in the application, which will be made to exercise the rights mentioned above and include explanations regarding the right he/she requests to exercise. Information and documents related to the application must be attached to the application.

Although the subject of the request must be related to the applicant's self, if acting on behalf of someone else, the applicant must be specially authorized in this regard and this authorization must be authenticated (special power of attorney). In addition, the application must include identity and address information, and documents confirming the identity must be attached to the application. Requests made by unauthorized third parties on behalf of someone else will not be valid and taken into consideration.

5. How Long It Takes to Respond to Your Requests Regarding the Processing of Your Personal Data?

Your requests regarding your demand for the right to your personal data are evaluated and responded to within 30 days at the latest from the date of receipt. If your application is evaluated adversely, grounded reasons for rejection will be sent to the address you indicated in your application by e-mail or postal mail, or by one of the methods selected in the <https://ecm.erguvan.co/privacy-policy>, which you can also access on Erguvan's website.

6. Security of Your Information

We implement reasonable and appropriate security measures in order to preserve the security, integrity, and confidentiality of your personal data, and, in particular, to protect such personal data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to it in accordance with this Privacy Notice.

7. How Long We Keep Your Information

Erguvan undertakes not to keep your personal data beyond the period strictly necessary for the purposes for which it was collected, and in accordance with the applicable regulations, as well as any laws and regulations, including taxing and accounting.

Erguvan undertakes to anonymize or delete your personal data as soon as the purpose and/or the duration of their established retention expires.

After having served its main purpose, personal data may be archived for auxiliary purposes, such as of researching, investigating, and prosecuting criminal offenses, litigation, or accounting and tax purposes. Archiving implies that this personal data will be subject to limited access restrictions.

8. Changes to Erguvan's Privacy Policy

We may update Erguvan's Privacy Notice from time to time. When we do, we will revise the "last updated" date at the top of the policy. If we make changes that we deem material, we will use reasonable efforts to notify you (such as by placing a notice on the Erguvan website, or by sending you a notice to the e-mail address you have registered with us, if any). We encourage you to periodically check the Erguvan website and this Privacy Notice for updates. If you would like a copy of earlier policies, please get in touch using the Contact Us information above.