The illumination Text in Accordance with the Law on the Protection of Personal Data (KVKK)

*As **IKARUS Management**, we would like to inform you about the processing of your personal data in accordance with the Law on the Protection of Personal Data (KVKK), keeping our sensitivity to the protection of your personal data at the forefront.*

*As **IKARUS Management,** we are the data controller responsible for the processing of your personal data. For contact and detailed information, you can use our contact information below:*

IKARUS Management:

***Address:** Alacaatli Mahallesi 3306/1 Sokak No:9 06810 Çankaya-ANKARA*

***Phone:** +90 312 511 83 00 +90 552 5805524*

***E-mail**: investikarus@gmail.com info@investikarus.com*

Your personal data will be processed based on the legal reasons specified in the KVKK and with explicit consent. Your processed personal data will be processed for specific, clear and legitimate purposes in accordance with the law and honesty rules.

Do not hesitate to contact us to exercise your rights under the KVKK and to get information about any issue related to your personal data.

We may update the illumination text from time to time. These changes take effect as soon as they are published on our website. If you have any questions or concerns about this illumination text, please do not hesitate to contact us.

Please read carefully the 'Advisory Service The İllumination Text on the Protection and Processing of Personal Data' below.

CONSULTANCY SERVICE THE ILLUMINATION TEXT ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

1. Purpose

Ikarus Management Investment Education Consultancy Tic. Ltd. Şti. ('IKARUS' or the "Company") *aims to process personal data belonging to real person suppliers in accordance with the provisions of the Personal Data Protection Law No. 6698 (the "KVK Law") and other legislation.*

Since you are our business partner who receives real person/legal person consultancy services of our Company, your personal data that you have reported/will notify to our Company and/or obtained by our Company through any external means will be processed by our Company in the capacity of "Data Controller";

- Your personal data in accordance with the law and within the framework of a specific purpose; in connection with this purpose, in a limited and measured format,

- By protecting the accuracy and the most up-to-date version of the personal data that you have notified to our Company or as reported,

- We inform you that this personal data will be saved, stored, stored, reorganized, shared with the institutions authorized to request it by law, and may be transferred, transferred, classified and processed to domestic or international third parties in other ways listed in the KVK Law and may be subject to other transactions listed in the KVK Law under the conditions stipulated by the KVK Law.

With The İllumination Text, it has been adopted to maintain and develop the activities carried out by ***IKARUS*** *in accordance with the principles set out in the KVK Law.*

2. Collection of Personal Data of Real Person/Legal Entity Consulting Service Recipients and Procedure

Our Company will process your personal data in accordance with the purposes specified in this The İllumination Text. In case there is any change in the purpose of processing your personal data, you will be informed and permission will be obtained if deemed necessary.

Our Company collects all kinds of information, documents, physical or electronic media obtained from public institutions and organizations for reasons stipulated in the laws, and cameras placed in Company buildings to fulfill its legal obligations, both before the establishment of the contractual relationship with your company and/or with you, both after the establishment of the contractual relationship and during the continuation of it, and obtained from third parties, physical or electronic media obtained from public institutions and organizations for reasons stipulated in the laws.

The personal data collected and used by our company, belonging to suppliers, are especially as follows:

	Content of Personal Data
Identity Data	*Name-surname, T.C. identification number, tax identification number, nationality information, mother's name-father's name, place of birth, date of birth, gender, documents such as identity card, driver's license, signature /initialization information.*
Contact Data	*The person's title, phone number, public address information, fax, country, city, e-mail address, etc.*
Financial Data	*Personal data processed related to information, documents and records showing all kinds of financial results created according to the type of legal relationship the company has established with the personal data owner, bank account number, IBAN number, credit card number, etc. informations*
Other Data	*The data contained on the workplace permit form (Name of the office, name of the work to be done, date, tax office and number, service offer data such as)*
Physical Space Security Data	*Personal data related to the records and documents obtained at the entrance to the physical space, during the stay in the physical space; entry – exit records, camera records and records taken at the security point, etc*

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3. Collection and Processing of Personal Data of a Special Nature

Your Special Personal Data; blood information and religious information contained on the old ID or driver's license are collected and processed by our Company in order to carry out the purchase processes of goods and services.

4. Purposes of Processing of Personal Data and Legal Reasons

Your Personal Data may be processed by our Company for the purposes specified below, but without being limited to these. For the purpose of establishing and fulfilling the contract, in particular;

- Execution of assignment processes,

- Execution of the contract processes and collection of the necessary documents for the contract,

- Recording of the interviews made

- Execution of communication processes,

- Execution of tender processes

Your personal data will be stored for a reasonable period specified in the relevant legislation or until the termination of the purpose of processing, and probably until the legal statute of limitations.

5. Ensuring the Security and Confidentiality of Personal Data

In accordance with Article 12 of the KVK Law, our company takes all necessary technical and administrative measures to prevent unlawful processing of personal data and unlawful access to personal data, and to ensure the appropriate level of security to ensure the preservation of personal data.

Technical Measures Taken to Ensure the Lawful Processing of Personal Data and to Prevent Unlawful Access to Personal Data

- Taking technical measures to the extent possible by technology,

- Employment of people who are experts in technical issues,

- Conducting an audit on the implementation of measures taken at regular intervals December,

- Creation of the necessary infrastructure to ensure security,

- Using a backup program in accordance with the law to ensure that personal data is stored securely,

- Using software containing virus protection systems.

Our company has taken all kinds of technical and technological security measures in order to protect your personal data and has protected your personal data against possible risks.

Administrative Measures Taken to Ensure the Lawful Processing of Personal Data and to Prevent Unlawful Access to Personal Data

- Training and raising awareness of the company's employees regarding the KVK Law,

- In cases of personal data transfer, ensuring that a record is added to the contracts concluded with the persons to whom the personal data is transferred that the party to whom the personal data is transferred will fulfill the data security,

- Determination of the requirements to be fulfilled for compliance with the KVK Law and preparation of internal policies for their implementation,

Measures to be Taken in Case of Disclosure of Personal Data by Unlawful Means

Personal data processed by unlawful means 3. if it is obtained by individuals, our Company will notify this situation to the relevant data owner and the Personal Data Protection Board as soon as possible.

6. Deletion, Destruction and Anonymization of Personal Data

7 Of the KVK Law. in accordance with the article, although the personal data has been processed in accordance with the relevant legislation, if the reasons requiring its processing disappear, the personal data will be deleted, destroyed or anonymized by our Company on your own or at the request of the personal data owner.

Methods of Deletion and Destruction of Personal Data

- It refers to the process of making personal data inaccessible and unusable again for the relevant users in any way.

- Example: Different methods can be used, such as physical destruction, secure deletion from software, secure deletion by an expert.

Methods of Anonymization of Personal Data

- It refers to making personal data such that it cannot be associated with an identified or identifiable real person under any circumstances, even by matching it with other data.

- Example: Different methods such as masking, data derivation, data hashing, aggregation can be used.

7. The Rights of Our Business Partners to whom We Provide Consulting Services

11 Of the KVK Law. in accordance with the article, you can make requests regarding the following issues about your personal data by applying to our Company:

- To learn whether your personal data has been processed or not,

- If personal data has been processed, requesting information about it,

- To learn the purpose of the processing of your personal data and whether they are used in accordance with your purpose,

- To learn about the third parties to whom your personal data are transferred domestically or abroad,

- To request correction of your personal data in case of incomplete or incorrect processing and to request notification of the transaction made in this context to the third parties to whom the personal data are transferred,

- To request the deletion, destruction or anonymization of your personal data if the reasons requiring the processing of your personal data disappear, and to request that the transaction made in this context be notified to the third parties to whom the personal data are transferred,

- To object to the occurrence of a result against the data owner by analyzing the processed your personal data exclusively through automated systems,

- To request compensation of the damage in case of suffering damage due to the unlawful processing of your personal data.

28 Of the KVK Law. according to the article, the provisions of the law are not applied in the following cases:

- The processing of personal data by natural persons within the scope of activities related to themselves or their family members living in the same housing, provided that they are not given to third parties and that the obligations related to data security are complied with.

- Processing of your personal data for purposes such as research, planning and statistics by anonymizing them with official statistics.

- Processing of your personal data for art, history, literature or scientific purposes or within the scope of freedom of expression, provided that they do not violate national defense, national security, public security, public order, economic security, privacy of private life or personal rights or do not constitute a crime.

- Processing of your personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations assigned duties and authority by law in order to ensure national defense, national security, public security, public order or economic security.

- Processing of your personal data by judicial authorities or execution authorities in relation to investigation, prosecution, trial or execution procedures

The 10th article regulating the obligation of the data controller to inform, provided that it is in accordance with and proportionate to the purpose and basic principles of this Law, the 11th article regulating the rights of the data subject, except for the right to request compensation for damage, and the 16th article regulating the obligation to register in the Data Controllers Registry are not applied in the following cases:

- The fact that the processing of personal data is necessary for the prevention of the commission of a crime or for the investigation of a crime.

- Processing of personal data made public by the data subject himself.

- Personal data processing is necessary for the execution of supervisory or regulatory duties and disciplinary investigation or prosecution by authorized and authorized public institutions and organizations, as well as professional organizations that are public institutions, based on the authority granted by law.

- Personal data processing is necessary for the protection of the economic and financial interests of the State in relation to budgetary, tax and financial issues.

The applicant will fulfill the requests arising from the KVK Law through the "Personal Data Owner Application Form". Our company, requests for applications, KVK Law 13. in accordance with the article, it will be concluded free of charge according to the nature of the request and no later than 30 (thirty) days, and if the response process also requires a cost, a fee may be requested in accordance with the relevant legislation. If the request is rejected, the reason / reasons for the rejection will be notified to you in writing or electronically for their reasons.

This the illumination text may be revised by our Company if deemed necessary. In cases where revision is in question, you will be informed about this issue.