



PRIVACY POLICY

Who We Are?

Puki® Technology ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Puki Yazilim Teknoloji A.S.'s registered office is at Maslak Mah. Maslak Meydan Sok. Beybi Giz Plaza A Blok No:1/55 Sarıyer / İSTANBUL and we are a company registered in Türkiye under company number (Ticaret Sicil) 310860-5. We define us as the data controller when processing your data. Our designated Data Protection Officer/Appointed Person is Omer Kilinc, who can be contacted at compliance@pukisoft.com

Information That We Collect

Puki® Technology processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data that we collect from is: -

- User Identity Data (Name, surname, Duty/Title)
- Contact Data (E-mail, Phone number)
- Process Security (Password, IP Address)

We collect information in the below ways: -

- Online web forms,
- Website activities
- Webinar activities
- E-mail (Communication)

How We Use Your Personal Data (Legal Basis for Processing)

Puki® Technology takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. **The purposes and reasons for processing your personal data are detailed below: -**

- Execution of Goods / Service After Sales Support Services,
- Execution of Access Authorisations,
- Execution of Finance and Accounting Affairs,
- Execution of Communication Activities,
- Execution/Supervision of Business Activities,
- Receiving and Evaluating Suggestions for Improvement of Business Processes,
- Execution of Training Activities,
- Execution of Business Continuity Ensuring Activities,
- Execution of Logistics Activities,



- Execution of Goods / Services After Sales Support Services,
- Execution of Goods / Service Sales Processes,
- Execution of Goods / Service Production and Operation Processes,
- Execution of Customer Relationship Management Processes,
- Execution of Activities for Customer Satisfaction,
- Organisation and Event Management,
- Execution of Risk Management Processes,
- Execution of Contract Processes,
- Business Activities Execution
- Evaluation of Requests,
- Execution of Information Security Processes,
- Execution of Analysis Studies

Your Rights

You have the right to access any personal information that **Puki® Technology** processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. **Puki® Technology** uses third-parties to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

Hubspot CRM – ([Privacy Policy](#))

Your Name, Surname, Title, E-Mail, Telephone number, IP Address data are processed on CRM in order to carry out customer acquisition, marketing activities, analyses of website activities.



Amazon AWS – ([Privacy Policy](#))

Puki application is offered as SaaS using AWS technologies. When you use Puki Systems stored on AWS London datacentre, your data is processed within the scope of the purposes of use of the application.

Safeguarding Measures

Puki® Technology takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including: -

SSL, TLS, encryptions, pseudonymisation, restricted access, IT authentication, firewalls, anti-virus/malware etc.

Transfers Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data.

Puki® Technology does not transfer or store any personal data outside the EU.

Consequences of Not Providing Your Data

You are not obligated to provide your personal information to **Puki® Technology**, however, as this information is required for us to provide you with our services/deliver your products/legitimate interests, we will not be able to offer all our services without it.

Legitimate Interests

As noted in the 'How We Use Your Personal Data' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We use the legitimate interests' legal basis for processing Identity and communication data and have identified that our interests are

- Provided that it is directly related to the establishment or performance of a contract,
- it is necessary to process personal data belonging to the parties to the contract,
- provided that it is not prejudicial to the fundamental rights and freedoms of the data subject,
- it is mandatory to process data for the legitimate interests of the data controller, and
- it is mandatory to process data for the establishment, exercise or protection of a right.

How Long We Keep Your Data

Puki® Technology only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your



basic personal data (name, address, contact details) for a minimum of 6 years after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Lodging A Complaint

Puki® Technology only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Puki Yazılım Teknoloji A.Ş.

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