

Confidentiality Statement for ODE Website

Confidentiality policy

This confidentiality statement explains the way in which we, ODE Yalitim Sanayi ve Ticaret. A.Ş. ("**ODE**") collect, store, and use information pertaining to individuals who visit this website. BY USING THIS WEBSITE, YOU PERMIT THE COLLECTION AND USE OF INFORMATION STATED IN THIS CONFIDENTIALITY POLICY. YOU ALSO ACKNOWLEDGE THAT ODE MAY CHANGE, AMDEND, MAKE ADDITIONS TO, OR REMOVE SOME PARTS OF, OR UPDATE THIS CONFIDENTIALITY POLICY AT ITS OWN DISCRETION, WITHOUT PRIOR NOTIFICATION, AND ON A PERIODICAL BASIS. However, your personal information will always be treated in accordance with the confidentiality policy that is in effect at the time of the reception of the information, and with Law Number 6698 on the Protection of Personal Data ("KVKK"). We aim to announce the changes we have made to our confidentiality policy on this website to ensure that you are fully informed of the types of information we collect, how we use this information, and the conditions under your information may be disclosed. Our confidentiality policy is found on our home page as well as on any page where personal data are requested. More information regarding the purpose of use of the data may be provided at these data collection points when needed.

Pledge of confidentiality

The term "Personal Data" that is used in the confidentiality policy means information that can be used to identify you such as your name, date of birth, e-mail address, mail address, or telephone number. In general, your personal data will only be processed in ways that are specified in this confidentiality policy. However, we reserve the right to carry out additional transactions to the effect permitted or required by the law, or with the purpose of providing support to legal or criminal investigations.

Processing of personal data

We, ODE, state that your personal data which we have requested as data controllers in a manner limited, and deliberate manner that is related with the purpose for processing data, which you have shared with us, and which may include specific personal data may be recorded, stored, kept, reorganized, shared with organizations who have the legal authority to request this personal data, conveyed or transferred to domestic or foreign third parties, classified and processed in other ways that are listed in the KVKK, also within the scope of the purpose requiring their processing.

ODE's purposes and legal reasons for processing your personal data are: to carry out all of our legal obligations including our obligations that fall within the scope of legislations; to organize all records and documents on an electronic or paper medium in accordance with the purpose for processing of data; to follow provisions regarding storage, reporting, notification obligations stipulated by relevant regulatory bodies; and all manner of other reasons written in laws. Within this framework, an investigation of any violations or suspected violations of company codes and of Laws, carrying out of proceedings pertaining to these, and in the scope of such, inspection of communications carried out over hardware and software provided by the Company and/or within the scope of work associated with the Company are also included within the definition of processing your data for legitimate purposes.

While we process personal data, we take all requisite steps to ensure the accuracy and currency of your data in accordance with the purpose for their collection.

By sending an e-mail to the address kvkk@ode.com.tr you have the right to

- (a) Learn whether your personal data has been processed,
- (b) If your data has been processed, to request information,

- (c) To learn the purpose for which your data was processed, and whether your data was used for the intended purpose,
- (d) To know the domestic/foreign third parties to which your data was transferred,
- (e) To request a correction if your data were processed in an incomplete/incorrect way,
- (f) To request its deletion/destruction within the provision stipulated in article 7 of the KVKK,
- (g) In accordance with subparagraphs (d) and (e) of the above mentioned article of law, to request notification of any transactions to third parties to which your data were transferred,
- (h) To protest any conclusions to your detriment that have resulted from an analysis of your personal data exclusively by automatic systems,
- (i) And to claim damages in the event of any loss you have suffered as a result of unlawful processing of your personal data.

Requests for deletion of personal data shall be subject to legal and ethical obligations for reporting, document filing, or storage, which we are bound to follow.

Security and confidentiality

Among other measures, we use data networks that are protected by industry standard firewalls and password protection to ensure the security and confidentiality of the personal data we collect online. During the processing of personal data, we reasonably designed measures to protect this information against being misplacement, abuse, unauthorized access, disclosure, alteration, or deletion.

Transfer of data overseas

We are in possession of databases that are operated by ODE companies residing in various countries as well as those operated by third parties overseas on behalf of ODE. We may transfer your data to one of these overseas databases within this scope. These countries may include those which do not require an adequate level of protection as compared to your own country.

Cookies and web beacons

We may collect and process information pertaining to your visit to this page such as the pages you have visited, which internet site you came from, and some searches you carried out. We use this information to help improve our website content and to compile mass statistics pertaining to individuals who use our website, for the purposes of market research. While doing this, we may use "Cookies" which gather information regarding your user domain, Internet Service Provider, operating system, date and hour of access. Cookies are small bits of information that are sent to your browser and are stored in your computer's hard disk. Cookies do not harm your computer. You can set your browser to warn you anytime you receive a cookie. This will enable you to decide whether or not you will accept the cookie. If you do not want us to use cookies, please send an e-mail to the address kvkk@ode.com.tr. However, you may not be able to use all functions of your browser if you do not accept this. We may obtain services from third persons to aid us in the collection and processing of information discussed in this section.

From time to time, we may also use web beacons (also known as process beacons, single pixel GIF's, transparent GIF's, invisible GIF's, and 1x1 GIF's) on this website, and place these beacons/cookies via a third party advertising partner or web analytics service partner located overseas and stores the related information (including your IP address) in this overseas country. The beacons/cookies in question may be placed in online advertisements which direct users to this site, as well as on various pages of this website. We use this technology to measure visitor's reactions to our website, the degree to which our advertising campaigns are effective (including the number of times a page was viewed, and which information was accessed), and to evaluate how you use this website.

Our third party business partner or web analytics service partner may use these web beacons/cookies to collect data regarding people who visit our website and other websites; may compile reports regarding the effectiveness of the website on our behalf, and provide other services associated with Internet use. If required

by law or if they have assigned other persons to process this information on their behalf, these entities may give the information in their possession to said persons.

Links to other sites

This confidentiality policy applies to this website alone, and does not apply to websites owned by third parties. We may provide links to other websites we believe may be interesting to our visitors. We aim to make sure these websites are those of the highest standards. However, due to the nature of the Internet, we can not guarantee confidentiality standards of websites to which we link, or be responsible for the content of websites other than this one. This confidentiality policy also does not apply to any linked website that does not belong to ODE.

Contact us

If you have any questions or complaints regarding our compliance with this confidentiality policy, or should you have any recommendation or comments to improve the quality of our confidentiality policy, please inform us by e-mailing us at kvkk@ode.com.tr.

This confidentiality policy was last updated on [06.13.2018] We aim to constantly improve the tools which you can use to manage the data you provide to us. Please visit this page from time to time to examine these and other new features.