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Document Name	Personal Data Protection and Privacy Notice		

Etisan Proje A.Ş., within the scope of the services it provides, carries out personal data processing activities on behalf of the institutions it serves and the users affiliated with these institutions, and such data processing activities are conducted in accordance with the Personal Data Protection Law No. 6698 (“KVKK”) and the applicable legislation.

1. Data Controller

In accordance with the Personal Data Protection Law No. 6698 (“KVKK”), your personal data is processed by Etisan Proje A.Ş. acting as the data controller.

2. Processed Personal Data

Within the scope of the services provided by our company, the following personal data may be processed:

- **Identity Information:** Name, surname, Turkish ID number
- **Contact Information:** Phone number, email address
- **User and System Information:** Card ID, user ID, student/personnel number
- **Financial Information:** Transaction approval data obtained from relevant banking systems for the purpose of accessing cafeteria services
- **Access and Location Data:** Turnstile entry-exit records for reporting purposes
- **Transaction Security Data:** IP address, user activity records, and system access logs processed for ensuring system security and audit processes
- **Usage Data:** System usage activities and reporting data

3. Purposes of Processing Personal Data

Your personal data is processed for the following purposes:

- Execution of access control and authorization processes to enable users to benefit from cafeteria services
- Management of turnstile access and identity verification processes
- Recording and reporting of user transactions
- Ensuring system security and prevention of misuse
- Execution of customer support and request management processes
- Improving service quality and conducting analysis activities
- Fulfillment of legal obligations in accordance with applicable legislation

4. Legal Grounds for Processing Personal Data

Your personal data is processed based on the following legal grounds specified in Articles 5 and 6 of the KVKK:

- Being directly related to the establishment or performance of a contract
- Fulfillment of the legal obligations of the data controller
- Legitimate interests of the data controller, provided that fundamental rights and freedoms of the data subject are not harmed
- Explicit consent (where required)

5. Methods of Collecting Personal Data

Your personal data is collected through the following channels:

- POS devices
- Turnstile systems
- Kiosk devices
- Web and mobile applications

- Integrated institutional systems

via automated or semi-automated methods

6. Transfer of Personal Data

Your personal data may be transferred to the following parties in accordance with Articles 8 and 9 of the KVKK:

- Universities and institutions receiving services
- Authorized public institutions and organizations

Where necessary, your data may be processed on domestic servers as part of the service infrastructure.

7. Data Security

Our company takes the following technical and administrative measures to ensure the security of personal data:

- Role-based authorization and access control
- Data encryption and secure data transmission
- Logging and system monitoring mechanisms
- Network security and firewall implementations
- Regular security tests and controls

8. Retention Period of Personal Data

Personal data is retained as follows:

- Financial records: for the duration specified in the relevant legislation
- System log records: for a limited period based on operational needs



- User data: for the duration of the service relationship At the end of the retention period, data is deleted, destroyed, or anonymized.

9. Rights of the Data Subject

Pursuant to Article 11 of the KVKK, data subjects have the right to:

- Learn whether their personal data is processed
- Request information if their data has been processed
- Request correction of incomplete or inaccurate data
- Request deletion or destruction of personal data
- Object to processing

10. Application Method

Data subjects may submit their requests via the following communication channels:

- **E-mail:** talep@etisan.com
- **Written application:** Etisan Proje A.Ş.

Applications will be concluded within 30 days in accordance with the KVKK.