

PRIVACY POLICY

Updated on: 15.10.2020

We are aware how important it is for you to ensure the security of your data. In this respect, it is also very critical for us to ensure the safe protection and Privacy of your data. Makrev Makina Mühendislik San. ve Tic. Ltd. Şti, a limited liability company organized pursuant to Turkish law and acting as the Data Controller (hereinafter referred to as “Makrev” or “we”) hereby undertake to respect to your personal data and other confidential information and to take all reasonable measures to ensure the security of such data and to employ such security measures that may be required under the applicable law.

Therefore **Makrev** Privacy Policy is intended to give you information about purposes why **Makrev** shall use your personal data in what way and about third parties that we may share it.

This Privacy Policy shall be only applicable to services provided at and over the domain name <http://www.makrev.com> (hereinafter referred to as the “**Site**” or “**Web Site**”). In the event that **Makrev** processes your personal data via our web site, these data shall be used in line with our Privacy Policy.

YOUR USE OF THE WEB SITE SHALL MEAN YOUR ACKNOWLEDGMENT OF THE PRIVACY POLICY AND APPLICABLE TERMS OF USE.

We recommend you to view our Privacy Policy every time you visit our Web Site because this Privacy Policy may be from time to time updated by **Makrev** for any reason whatsoever. When you use our Web Site, you shall be deemed to have read the latest version of our Privacy Policy and to have accepted amended terms and conditions as well. Amendments to the Privacy Policy shall automatically become effective upon its publication at the Site. Every updated new version shall be applicable to data that has been already collected.

All updates to the Privacy Policy shall be published in the home page at <http://www.makrev.com/>, on the Privacy notice page and in any other convenient place, and you will be duly informed about how your personal data are collected, used or share.

Processing Your Data and Personal Data

Data means information related to all numerical data such as age, height and weight as well as categorized facts such as brand name, channel, country and city that may be collected and analyzed for interpretation and presentation purposes.

Personal data means all kinds of data of an identified or identifiable individual, including his name, address, e-mail address, phone number, birth date and IP address. Your this kind of data shall be processed in full compliance with the Personal Data Protection Law in addition to the present Privacy Policy. In case of any discrepancy between this Privacy Policy and applicable legislation, applicable legislation shall prevail.

Makrev and our contracted service providers shall use your data in order to respond your communication requests, to inquire into and reply your complaints, questions and opinions in your messages, to do the most suitable thing to meet your needs, to offer you better services, to make the use of our web site more convenient, to share our advertisement and marketing works with you, to consult you for your opinions and to customize campaigns, services or offers for you.

Certain sections in the web site may make it mandatory for you to disclose your specific personal data. In this respect, you may be required to provide your personal data only for the performance of services and activities in that specific section, It will be purely at your discretion to provide us with your personal data in such a case, and in the case you wish not to provide them, you may not be making use of our services or activities in question.

Makrev shall process your personal data which you will be providing and disclosing at your discretion, and may also process them in line with general data in the case there are certain processing conditions in the applicable legislation that should be fulfilled.

We do not hold it obligatory to provide your personal data to log in our web site. Data asked from you are at a reasonable level and do not require you to disclose any data more than necessary. You will see a small red asterisk (“*”) next to the information that you are required to strictly provide to use our services. Any data without that sign may be optionally provided.

In **Makrev**, we may collect, use and process:

* your name, surname, e-mail address, phone number and address details provided by you on the contact form to submit your opinions, suggestions and wishes and to send your communication requests,

* your data that we may collect during various researches that we carry out in respect of you under services and activities set out in those sections;

* your service preferences or your past experience;

* your data about invoicing and payment instruments. We can also transfer them to our contracted service providers, business partners, suppliers and participants that help us pursue our operations, authorized administrative agencies and, subject to legal requirements, other applicable individuals and entities.

Makrev shall process all your non-sensitive personal data in line with Article 5 of the Personal Data Protection Law without the need to get your consent on the condition:

- that it is expressly required under the applicable laws;
- In the case it is necessary to protect the life or bodily integrity of a person himself or a third party who is not in any position to inform his consent due to actual impossibility or whose consent is legally invalid and incompetent;
- If it is directly related to the execution or performance of a contract, if processing the personal data of the contract parties is necessary
- If it is obligatory for the data controller to perform its legal obligations,
- If the data are publicized by the data subject himself,
- Where data processing is mandatory to vest in, use or protect a right
- Where data processing is required for legitimate interests of the data controller, that that it shall not cause any harm to fundamental rights and freedoms of the data subject.

Your sensitive personal data (including race, ethnic origin, political thoughts, philosophical belief, religion, sect or other beliefs, clothing and appearance, membership to associations, foundations or

unions, criminal conviction, data related to security measures and biometric and genetic data) may be processed only under such circumstances defined in the applicable laws. For the purposes of processing sensitive personal data, such sufficient measures as defined by the Committee are duly adopted.

Your sensitive personal data about your health and sexual life may only be processed by those persons who are subject to Privacy obligation or competent bodies and entities with the intention to protect public health, to provide preventive medicine, medical diagnosis, treatment and care services and to plan and administer healthcare services and their financing. They shall not be processed for any other reason without your explicit consent.

Makrev shall in any case process your personal data to comply with rules of good faith and law, to keep them correct, and where necessary, current, to process them for specific, explicit and legitimate purposes in a manner related, limited and proportionate to the purpose they are processed, provided that such data shall be stored for such duration as defined in the applicable laws or as required for the purpose they are processed for.

We have drafted individual privacy notices for each area where your personal data collected as well as for cookies used in the Web Site in connection with the processing of your personal data by **Makrev**. You can find these privacy notices in the said sections or may have access to them by clicking on [The Clarification Text For Contact Section](#) and [The Clarification Text For Cookies](#).

Moreover, we can also collect your personal data by employing the following methods:

*- Web site server automatically collects such data that helps us to track user movements and find out user trends in the application, such as your Internet protocol (IP) address, type and language of your browser, application log-in date and time.

* One or more than one cookie (identification info) may be assigned (sent) to your devices to make it more easier for you to have access to the Site and to personalize your online experience. The Site shall use “cookies” to carefully track certain data that you provide when you visit or use the Site. “Cookies” are tiny files that are available in your computer for recording purposes so that records are kept and you will be identified by the Site this way. Cookies are commonly used in many web sites and are not linked or related to personal data of users. If settings of your browser are configured to reject all cookies, then the Web Site may not function smoothly. Please click [here](#) to read more detailed information about cookies.

* **Makrev** and third parties who define its advertisement and marketing strategies, such as its consultants and assistants may use standard Internet tools such as pixel tags (web beacons) which track your use of the Site and which allow us to customize our services provided and advertisements published by us. Pixel tags (also known as “clear gifs”, “web beacons” or “web bugs”) are tiny forms and shapes with unique identifying signs and that function like cookies and are used to track online movements of an Internet user or to have access to cookies. Unlike cookies saved in the user’s hard disc, pixel tags are invisibly embedded in the web site or in the e-mail, and they are nearly in the size of dots placed at the end of this sentence. Pixel tags may be also used to deliver or communicate with cookies to count the number of users visiting certain web sites and to understand the way they are used. The Site may also use pixel tags to understand if promotional (or other) e-mails or bulletins sent by it are opened or any action has been on them. Moreover, if you are directed to <http://www.makrev.com> by clicking on an ad you have seen in another web site, the Site shall receive an anonymous ID number.

Purpose of Processing Your Personal Data

Makrev may process personal data to offer full and complete services provided by it, to improve these services and to provide new ones, or if certain conditions set out in Paragraph 2 of Article 5 of the Personal Data Protection Law and Paragraph 3 of Article 6 thereof do exist.

Makrev shall process your personal data for the purposes below:

- To inquire into and reply your complaints, questions and opinions set out in your messages;
- To draft offers and services customized for you in line with your requests and to transit our such offers;
- To fulfil our obligations for the performance of our services;
- To create database, to do listing, reporting, verification, analysis and assessments, to generate statistical data, and where necessary and subject to compliance with Privacy conditions, to share such data with experts in these fields;
- To analyse your use of our Web site and other communication channels, and to customize our communication channels specific for you to provide better services;
- To customize advertisements you see in the Site and their contents and to make it easier for you to use the Site.
- To investigate and improve our services and your personal optional means in respect to them;
- To find out any abuse of the Site and any fraudulent transaction and to ensure protection against them;

- To contact you for market researches by using communication channels that you have shared with us directly or via business partners that serve us for this purpose;
- To find out those services that best suit your needs and to offer you better services;
- To share our advertisement and marketing works with you, to consult you; to design campaigns, services or offers customized for you;
- To promote our services to you and to maintain promotion-like commercial communication about new services, special offers or other matters or services that in our opinion you may be interested in.

Data Integrity

It is highly important for **Makrev** that collected data must be correct, full, current and suitable for purpose of use, and Makrev constantly works hard in this respect in line with ongoing development principle.

Sharing your Personal Data

We are aware of the fact that it is a statutory obligation not to disclose your personal data to third parties without your consent or other than exceptions set out in the personal data protection legislation.

Makrev reserves its right to disclose personal data of users collected over the Site to third parties in circumstances required under the applicable law, or to ensure compliance with applicable laws, court orders and procedures, summons and subpoenas or other legal formalities, or to prevent any prejudice to its own interests and to protect the security, rights and legitimate interests of its employees, representatives and Site users.

Makrev may disclose your personal data to our employees, contracted service providers, third parties involved in the production of our products and services, our business partners, and suppliers and participants that help us sustain our operations, or to competent administrative authorities, or subject to legal requirements, to other related third party individuals and entities based in Turkey or abroad.

While these entities to whom we disclose your data are subject to the applicable law in force, they are also under the obligation to protect the Privacy of data disclosed by us to them. Notwithstanding the foregoing, **Makrev** does not assume any liability for any unlawful acts committed by these third parties.

Our service providers are those companies that we have to work with or that may be useful to provide or improve our services offered to you and that in any event we do business strictly subject to full Privacy agreements, and they include data analysers, advertising agencies, server providers, data storage providers, IT and virtual security companies, SMS or e-mail infrastructure service providers or customer care services.

Commercial Transfer

In the case of a potential merger, acquisition and/s or transfer of Makrev so that its assets are transferred and/ or a change of control over it, personal data of the Site users may be disclosed to the relevant third parties.

Data Transfer to Abroad

Data transfer to **Makrev** and/ or third parties (which may involve personal data as well) subject to a permission may also entail the transfer of such data from one jurisdiction to another one.

Your personal data shall be transferred only on the condition that there shall be an adequate level of protection in the jurisdiction to which data shall be transferred, or unless there is such adequate protection, data controllers in Turkey and/ or in the relevant foreign jurisdiction shall make a written commitment for ensuring an adequate protection and upon the permission by the Committee.

Other Terms

* All **Makrev** employees agree and represent that they are familiar, and are obliged to comply, with this Privacy Policy. **Makrev** agrees and undertakes to consider all complaints about a potential breach of the Privacy Policy and to initiate required proceedings in case of a discovery of a breach.

* Links to third party web sites that **Makrev** do not own (including, but not limited to, advertisers) may be provided in the Site and in this case, **Makrev** shall be in no event responsible for the contents of those other web sites, accuracy of such data provided there or the web site functions.

Links are provided in good faith and **Makrev** may not be held responsible for any subsequent change to these other web sites. Provision of a link to other web sites shall not mean an endorsement by **Makrev** for those sites. A user shall be fully responsible in case he participates in lotteries or promotional campaigns organized by sponsors or clicks on advertisements for which a link is provided in the Site or for his individual or commercial relations with these web sites (including all personal

data to these advertisers and sponsors at your sole discretions, including delivery and payment of these services or products, or any rules, conditions and contractual statements that you promise to obey).

User agrees and undertakes that **Makrev** shall in no event be liable for any loss or aggrievement that may arise from this kind of relations, data disclosure to advertisers and sponsors or the provision of link to these persons in the Site. We recommend you to get familiar with and carefully read all legal and Privacy notices available at all other Internet sites that you visit.

* **Makrev** may permit third parties who are its advertising partners ad networks to display ads on the web site. These companies or nets may use tracking tools such as cookies in order to collect data about computers used to view or interact with these ads. **Makrev** shall not transfer any personal data to these companies or networks.

* **Makrev** is the owner of all intellectual and industrial property rights in all data and contents posted at the web site, their editing and their partial and/ or full use.

* Please remember that this Privacy Policy is applicable to online data collection and distribution in connection with the Site only and shall not be applicable to any of our offline applications.

Your rights regarding your Personal Data

You will have the following rights in connection with your personal data processed by **Makrev** by applying to **Makrev** (and specifically to data controller in circumstances where **Makrev** is the data processor):

- a) To inquire into whether your personal data are processed;
- b) To ask for information in case your personal data are processed;
- c) To inquire into the purpose underlying the process of your personal data, and whether or not such data are used in line with that purpose;
- ç) To know about third parties to in Turkey or abroad to whom your personal data are transferred;
- d) To demand that any incompletely or incorrectly processed personal data should be corrected;
- e) To demand that your personal data should be erased or destroyed in line with conditions set out in Article 7 of the Personal Data Protection Law;
- f) To ask that actions taken in line with subparagraphs (d) and (e) are notified to third parties to whom your personal data have been transferred;
- g) To object to any result that may work against you and that arises upon an analysis of your processed personal data exclusively by automated means;

ğ) To claim damages in case you sustain a loss due to the unlawful process of your personal data.

Options/Waiver

A user has the right to make a choice and/ or change his preferences by following the following methods:

- You may refuse to share our personal data, which is optional for the use of services and activities that we provide over the Site.
- You may choose no to disclose your personal data with the knowledge and acknowledgment that you shall not be able to have access to certain services and/ or you will not be able to use certain features of the Site.
- You may ask that your personal data disclosed by you in certain sections at the Web Site should be updated or erased, or your requests in those sections should be cancelled.
- In the event that you do not want to receive Site-related bulletins or promotional e-mails, you can opt out of your subscription to bulletins and promotions by clicking the “Cancel the Subscription” link at the bottom of e-mails sent to you. Moreover, whenever you wish to make a change in your SMS communication permissions, you can apply this change free of charge by following REJECT directive in SMS that we send to you.
- You may configure your browser settings for the erasure and/ or rejection of cookies with the understanding and acceptance that you may have some problems in your access to certain services and/ or the use of some Site features.

Updates and Corrections to your Personal Data

If you wish to get a copy of your data disclosed by you to **Makrev** or you notice that a data posted about you is wrong and want it to be corrected or erased, please contact us by sending an e-mail to makrev@makrev.com.

In order to comply with your such wish, before taking any action over data to be added and/ or erased, our IT Department staff may ask you to verify your ID info and other details, including your personally identifying data.

Following the evaluation of your request in light of proportionality, data quality and proportionality principles, these data may be edited or corrected or wrong data may be erased. In this respect, we will try to fulfil all requests you send to the Site within the most suitable time frame and in the best manner that suits your request.

You can use our PDPL Application Form that we have designed for you so that your requests will be fulfilled faster and we will help you in a better way.

Security of Your Personal Data

Makrev considers it important to protect the Privacy of your data. **Makrev** employs appropriate security systems to prevent the loss, modification or use of data under its control for different purposes. Moreover, our forms through which you send your data are protected by 128 Byte SSL (Secure Socket Layer), an encrypted communication channel during the transmission as an additional security application as it encrypts data entries.

When said data are received by **Makrev**, they are protected in line with our security and Privacy standards. In order to make use of SSL, your Internet browser should support SSL and SSL options in your browser should be activated.

Moreover, we also take all administrative measures that we believe are necessary to protect and safeguard your personal data. Access to your personal data is only available to our authorized employees for the purpose of performing their tasks in relation to our services. Accordingly, our staff members take necessary training courses and start their duties following the necessary briefing process.

However, as it is the case in every online data transfer, and by the very nature of information technologies industry, **Makrev's** security level that meets standards may not block an unauthorized access.

Therefore, **Makrev** shall not be liable for any damage and/ or loss that is attributable to security incidents or technical issues and that occur as described herein. **Makrev** shall not be responsible for any loss that may arise from data disclosure attributable to unwanted and/ or unforeseen reasons.

At this point, **Makrev's** commitment is to provide a data security policy that is defined by the Personal Data Protection Committee which shall not be less than a generally accepted security level and, in any event, that is acceptable and appropriate. This is not any preventive guarantee committee.

If you have reasons to believe that the Site's security has been breached, please contact us by sending an e-mail to makrev@makrev.com.

Cookies

Makrev may use cookies at its web site to improve your experience. No data shall be collected from your system and/ or hard disc by means of cookies used by us. You will not be identified with your name and e-mail address at our web site; but a number and directories shall be assigned at your first log-in.

Cookies are tiny data files that are embedded in your computer by means of the Internet network server through your browser. Whenever a connection is established between your browser and the server, the Site shall know you thanks to cookies. The purpose of using cookies is to provide convenience to the Web Site visitors. There are four types of cookies depending on the purpose of their use: Session Cookies, Performance Cookies, Functional Cookies and Advertisement and Third Party Cookies

Makrev may use session cookies, performance cookies, functional cookies and advertising and third party cookies in its own web site. Session cookies are temporary ones stored in the browser until the user leaves the website. Other cookies are those ones that stay in the user's browser unless and until they are erased by the user. Life of cookies may vary depending on browser settings set by the user.

You have the option to accept or refuse cookies by changing your Internet browser settings. Please check your browser's directions to learn how to change your settings or how to erase cookies. Please note that if cookies are deactivated, some features of the Site shall not be available to you.

You can read Makrev Cookie Applications Policy to get more detailed information.

By visiting the following web sites, you can learn how to block third party cookies.

[Mozilla Firefox](#)

[Internet Explorer](#)

[Google Chrome](#)

Opera

Safari

Contact

You can send your opinions and questions about this Privacy Policy and/ or **Makrev**'s general Privacy practices to us by using the following means of communication:

E-mail: makrev@makrev.com

or

Mail: Selahaddin Eyyubi Mah. 1624 Sokak No: 13 D:11 Esenyurt/ Istanbul/ Turkey

MERSIS: 061102543680017

Re: Privacy Policies

Contract Integrity

Site users agree and undertake that if any provision hereof is declared as invalid by any competent court, the provision in place which is the most appropriate for the regulation in that invalid one and which creates such effect that is closest to the true intentions of the parties shall be valid, and that this shall not affect the validity and effects of other provisions herein.

Dispute Settlement

Our corporate policy for any potential dispute that may arise between site users and **Makrev** is to ensure that these disputes shall be amicably settled between the Parties and that user satisfaction is guaranteed. You can send your complaints and requests to us about any matter by using the relevant section at the web site.

Moreover, if you wish, you can apply to mediation institution to settle your disputes. Your right to apply mediation shall in no event prevent you from using other legal remedies.

Accordingly, for your legal matters, you may apply to Courts of Commerce of First Instance in the provision or district where you live depending on the nature of the application, or unless there are such Courts in that provision or district, then to Civil Courts of First Instance.