

Privacy Policy

This Privacy Policy has been prepared by Namli&Kayum&Demir Attorney Partnership (“NKD”) in accordance with Article 10 titled “*Data Controller’s Obligation to Inform*” and Article 11 titled “*Rights of the Data Subject*” of the Law No. 6698 on the Protection of Personal Data (“KVKK”) and other applicable legislation, in order to inform you about the methods of collection, purposes of processing, transfer, and destruction of your personal data.

NKD may process your personal data in compliance with the personal data processing conditions set forth under the KVKK, including:

- In accordance with the law and principles of good faith,
- Accurately and, where necessary, kept up to date,
- For specific, explicit, and legitimate purposes,
- In a manner that is relevant, limited, and proportionate to the purposes for which they are processed,
- For a period stipulated by the relevant legislation or required for the purposes for which the data are processed.

I. Collection of Personal Data

Your personal data are collected during your visit to the website <https://www.kayumdemir.av.tr/> (“Website”) and directly from you. The data are securely stored in NKD’s user database.

1. Types of Personal Data Collected

- **Identity and contact information (Basic data):** Name, surname, phone number, postal address, e-mail address, and other contact details.
- **Registration data:** Information such as newsletter subscriptions, registrations for events, conferences, webinars, and seminars. These records may include your visual and audio data.
- **Client service data:** Personal data shared by clients regarding their customers, employees, or other individuals, as well as invoice details, payment history, and client feedback.
- **Job applicant data:** Data provided by job applicants or regarding job opportunities via our Website or other offline channels such as e-mail.

II. Purpose and Legal Grounds for Processing Your Personal Data

Your personal data are collected and processed for the purposes outlined below and based on the corresponding legal grounds.

Provision of legal consultancy services: Basic data, registration data, client service data, and device data are processed in order to fulfill our obligations under the contracts concluded with

our clients. These data are processed based on the following legal grounds, provided that the processing does not harm the fundamental rights and freedoms of the data subject:

- It is necessary for the legitimate interests of the data controller,
- It is directly related to the establishment or performance of a contract,
- The data have been made public by the data subject.

Management of recruitment and service provider processes and related development activities: Job applicant data and compliance data are processed for the purposes of managing recruitment processes and ensuring compliance with NKD's legal obligations. These data are processed in cases where they have been made public by the data subject and where processing is necessary for the fulfilment of NKD's legal obligations or for the purposes of legitimate interests, provided that it does not violate the fundamental rights and freedoms of the data subject.

III. Transfer of Personal Data to Third Parties

Sharing of Personal Data Pursuant to Article 8/2(a) of the KVKK

NKD may transfer your personal data to third parties without requiring your explicit consent, based on the legal grounds listed below:

i. For the performance of obligations arising from service relationships and/or for the fulfilment of legal responsibilities: To the extent strictly necessary and proportionate for the relevant purpose, your personal data may be shared with NKD's internal technical support teams, e-mail service providers, banks, audit firms, attorneys and law offices, financial advisors, event/seminar organizers, and other third-party service providers.

ii. For compliance with legal obligations: Your personal data may be shared with law enforcement agencies, judicial authorities, relevant ministries and directorates, and other public institutions authorized by law.

The transfer of personal data is carried out pursuant to Article 8/2(a) of the KVKK and based on the following legal grounds:

Article 5/2(a): where it is explicitly provided for by law,

Article 5/2(c): where it is necessary for the establishment or performance of a contract,

Article 5/2(ç): where it is necessary for compliance with a legal obligation,

Article 5/2(e): where it is necessary for the establishment, exercise, or protection of a right.

We may also be required to disclose your personal data in order to comply with legal or regulatory requirements. Unless legally restricted from doing so, NKD will make reasonable efforts to notify you prior to such disclosure.

IV. Use of Cookies

In order to understand and improve the experience of visitors using our Website, NKD uses strictly necessary first-party cookies that are essential for the operation of the Website.

V. Your Rights

As a data subject, you have the following rights under the applicable legislation:

- i. To learn whether your personal data are being processed and, if so, to request information about such processing (KVKK Art. 11/a and b),
- ii. To learn the purpose of the processing and whether your personal data are being used in accordance with that purpose (KVKK Art. 11/c),
- iii. To learn the third parties to whom your personal data are transferred (KVKK Art. 11/ç),
- iv. To request the correction of incomplete or inaccurate personal data (KVKK Art. 11/d),
- v. To request the deletion or destruction of your personal data where the reasons requiring their processing no longer exist (KVKK Art. 7 and Art. 11/e),
- vi. To request notification to third parties to whom your personal data have been transferred regarding any corrections or deletions (KVKK Art. 11/f),
- vii. To object to the results of analysis of your personal data processed exclusively through automated systems (KVKK Art. 11/g),
- viii. To request the restriction of the processing of your personal data (KVKK Art. 7), and
- ix. To request compensation if you suffer damage due to unlawful processing of your personal data (KVKK Art. 11/ğ).

Please note that these rights are subject to limitations as specified in the relevant provisions of the KVKK, and may only be fulfilled under certain conditions.

You may submit your requests regarding these rights by sending an e-mail to **info@kayumdemir.av.tr**. NKD will process your request as soon as possible and in any case within a maximum of thirty (30) days following receipt of your request and the necessary documentation.

Namlı&Kayum&Demir Attorney Partnership

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Telephone: 0 212 291 10 02

Website: <https://www.kayumdemir.av.tr/>

E-mail: info@kayumdemir.av.tr

You may exercise your right to lodge a complaint with the Board using the contact information below:

Board: Personal Data Protection Board (Kişisel Verilerin Korunması Kurulu)

Address: Nasuh Akar Mah. Ziyabey Cad. 1407. Sok. No: 4, Balgat, Çankaya, Ankara 06520

Phone: 0 312 216 50 00

Website: <http://www.kvkk.gov.tr>