

# Information Notice

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## Information Notice on Protection of Personal Data

As Pacovis Gıda Sanayi ve Ticaret A.Ş. (hereinafter referred to as "Pacovis" or "Company"), also regarded as the Data Controller, we proudly announce that we exercise due diligence in the security and protection of your personal data you share with us.

Therefore, all necessary administrative and technical measures are taken in the capacity of Data Controller in order to process and protect personal data of individuals related to our company in accordance with the Personal Data Protection Law (Law No. 6698, "PDPL") and General Data Protection Regulation (GDPR No: 2016/679) and also your personal data is processed within the limits set forth in the conditions and legislations described below pursuant to PDPL and GDPR.

The personal information recorded during the visit of our website is processed in accordance with the legislation regarding the protection of personal data. Check out our [Privacy Policy](#), which you can find on our website. However, it is important to note that there is no guarantee of data security on other websites, given links on the Pacovis website. In this regard, the policy of the relevant page regarding data security should be carefully examined.

### 1. Legal Character and Scope

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It is stipulated in Article 10 the Personal Data Protection Law No. 6698 ("PDPL") that those whose data have been processed should be informed while obtaining their approval. The title of the article is "The Information Obligation of the Data Controller".

According to the provisions of PDP, the Company is "Data Controller". In this context, with the information obligation, the obligation to inform the data subjects about their rights set out in Article 11 of PDPL, such as the identity of the data controller, personal data processing purposes, persons to whom personal data are transferred and the purposes for transfer, legal reasons for the collection of personal data, to whom personal data can be transferred and methods, update, deletion or anonymization that the data subject will direct to the data controller, have been introduced.

Pacovis, in the capacity of the Data Controller, informs and enlightens the data subjects that it processes your personal data within the limits and conditions stipulated in the legislation, in accordance with the provision of the Article 10 of the PDPL and the Information Obligation on the Processing of Personal Data.

### 2. Identity of the Data Controller

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According to subparagraph of the 1st paragraph of Article 3 of the PDPL, "(1) "Data Controller" means the natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data filing system. Within this framework, the data controller is Pacovis Gıda Sanayi ve Ticaret A.Ş. and contact details are given below.

Address:

Kemalpaşa OSB Mahallesi  
Sanayi Caddesi Dış Kapı No: 8

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### 3. Data Processor

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According to Article 3 of PDPL “Data Processor” means the natural or legal person who processes personal data on behalf of the data controller upon its authorization.

### 4. Purposes and Legal Basis of Processing Personal Data

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The Company processes personal data in compliance with data protection laws, in particular the General Data Protection Regulation (GDPR) and the Personal Data Protection Law, No: 6698 (PDPL) or other applicable local legislation.

a.) Within the framework of the performance of a contract or in order to take steps prior to entering into a contract (Art. 6(1)(b) GDPR) and (Art. 5/2-c of PDPL No:6698)

Pacovis processes personal data primarily to fulfill contractual obligations and to provide the related services, in particular the provision of our software solutions, or within the framework of a corresponding contract initiation (e.g. contract negotiations, preparation of quotations). The specific purposes are determined by the respective service or product that form the basis of the business relationship or contract initiation.

b.) Within the framework of the compliance with a legal obligation (Art. 6(1)(c) GDPR, (Art. 5/2-ç of PDPL No:6698)

In many situations, we are legally obliged to collect certain personal data and to forward it to, usually public, authorities or to make it available to them.

For example, we provide the tax authorities with the personal data that is required for tax calculation purposes in accordance with the relevant legal requirements.

c.) Within the framework of legitimate interests (Art. 6(1)(f) GDPR and Art. 5/2-f of PDPL No:6698)

We also collect and process personal data to pursue legitimate interests in the following situations:

- ✓ Processing of general requests for our products and services
- ✓ Purpose of planning HR Management and increasing employee loyalty (e.g. beneficial socioeconomic activities like birthday celebration)
- ✓ Advertising or market research
- ✓ Assertion of legal claims and defence in legal disputes
- ✓ Ensuring IT operations and IT security
- ✓ **Measures for building and system security (e.g. access authorizations)**
- ✓ **Measures to improve our internal business processes and product optimization**

d.) Within the framework of a consent (Art. 6(1)(a) GDPR) and (Art. 5/1, 6/2 of PDPL No:6698)

In some situations, the processing of your personal data is not absolutely necessary and only permitted with your consent. In such cases, we inform you about this circumstance and in particular about the fact that giving your consent is voluntary and revocable at any time with effect for the future.

This is the case, for example,

- especially before processing your special category personal data such as, health, biometric and genetic personal data,
- with some data processing via our website (see Privacy Policy on our website)
- in some situations of advertising (existence of an advertising consent, if required by law)

## 5. Our Principles for Processing Personal Data

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As a company; we have adopted the following rules as a principle when processing your personal data.

- a) To process in accordance with law and principle of good faith,
- b) To strive to ensure correct and up-to-date,
- c) To process for specific, explicit and legitimate purposes,
- c) To be connected, limited and restrained for the purpose for which they are processed,
- d) To store for the period stipulated in the relevant legislation or required for the purpose for which they are processed.

## 6. Ways of Processing Personal Data

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Your data is kept and processed by Pacovis only in the presence of your consent or one of the lawfulness conditions such as

- if It is expressly provided for by the laws
- Transactions directly related to the establishment or performance of a contract
- It is compulsory for the data controller to fulfil his legal obligation
- Processing of data is compulsory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject

Etc.

## 7. To whom and for what purpose the processed personal data can be transferred

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Your personal data, collected and processed in accordance with the PDP Law in our company, only for the purpose of doing the work and in company with confidentiality agreements; can be transferred to solution partners and companies in the position of assistant performance.

## 8. Method and Legal Reason of Collecting Your Personal Data

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Your personal data can be collected, updated, and processed verbally, in writing or electronically, in accordance with Articles 4, 5 and 6 of the PDPL, by automated or non-automated methods, by offices, call center, website, social media channels, mobile applications and similar means although it may vary depending on the service, product or commercial activity provided by our company.

Your personal data is obtained in any verbal, written or electronic environment, in order to be able to present the products and/or services we offer by the Company in accordance with the above-mentioned purposes within the legal framework determined and in this context, to fulfill our Company's contractual and legal obligations completely and accurately. Your personal data collected for this legal reason can also be processed and transferred within the scope of the personal data processing conditions and purposes specified in articles 5 and 6 of the PDPL, within the scope of the purposes specified in this Information Obligation.

## 9. How Do We Protect Your Personal Data?

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All necessary technical and administrative measures are taken to protect the personal data collected by the Pacovis and to prevent unauthorized access and to prevent our customers and potential customers from being suffered. In this context, the software is ensured to be in compliance with the standards, to select the third parties carefully and to obey our Privacy **Policy** within the company.

## 10. Rights of the Data Subject and Application to Data Controller

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As data subjects, if you submit your requests regarding your rights listed in Article 11 of the PDPL to our Company by the methods set out below in this Information Obligation, our company will conclude the request free of charge within thirty days at the latest, depending on its nature. However, if a fee is stipulated by the Personal Data Protection Authority, the fee in the tariff determined will be charged by our Company. In addition, as per the legislation in force, applications regarding personal data must be made by the data subject himself, only the part of your applications related to you shall be answered, and an application about your spouse, relative or friend shall not be accepted.

In this context, as the data subjects, you have the following rights regarding yourself by applying to our official announced by the Company on our website.

- a) to learn whether his/her personal data are processed or not,,
- b) to demand for information as to if his/her personal data have been processed,
- c) to learn the purpose of the processing of his/her personal data and whether these personal data are used in compliance with the purpose,
- d) to know the third parties to whom his personal data are transferred in country or abroad,
- e) to request the rectification of the incomplete or inaccurate data, if any, and to request notification of the transaction in this context to third parties to whom personal data is transferred,
- f) Although it has been processed in accordance with the provisions of PDPL and other relevant laws, to request the deletion or destruction of personal data if the reasons requiring its processing disappear and to request notification of the transaction in this context to third parties to whom personal data is transferred,
- g) to object to the occurrence of a result against the person himself/herself by analyzing the data processed solely through automated systems,,
- h) to claim compensation for the damage arising from the unlawful processing of his/her personal data.

## 11. Submission of the Application

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Pursuant to paragraph 1 of Article 13 of the PDPL, you can send your request for exercising your rights specified in article 11 of the same Law, to [\[info@pacovis.com\]](mailto:info@pacovis.com) by using the registered e-mail (REM) address or the e-mail address that you have previously notified to our company and registered in our system, or to our company's contact address in writing in person, through a notary or return receipt requested. You can reach the [application form](#) from the link with the necessary explanations.