

PRIVACY POLICY

1.ABOUT US

Trade Name : SKYMOD TEKNOLOJİ BİLİŞİM VE DANIŞMANLIK SANAYİ TİCARET ANONİM ŞİRKETİ

Tax Identification Number: 7721634467

Address : İTOB OSB MAH. 10032 SK. NO: 2 MENDERES / İZMİR

Phone : []

E-Mail : []

2.INTRODUCTION

SKYMOD TEKNOLOJİ BİLİŞİM VE DANIŞMANLIK SANAYİ TİCARET ANONİM ŞİRKETİ (hereinafter referred to as “We, us, SKYMOD”) prioritizes the protection of your personal data and aims to provide a secure and seamless experience when you access our websites or use our products and services (the “Services”).

Within the scope of this Policy:

- “**Customer**” refers to the natural and/or legal person who directly interacts with SKYMOD,
- “**Customer End Users**” refers to those who indirectly access SKYMOD Services by using customer platforms.

This Privacy Policy (the “**Policy**”) explains the information we collect, process, use, and protect regarding Customers and Customer End Users, as well as their rights to access, rectify, and disclose such information. By using our websites or Services or by sharing your personal information, you consent to the practices and data processing methods described in this Policy.

SKYMOD will process your personal information only in accordance with this Policy when requested. The Policy may be updated from time to time; to stay informed of changes, we recommend regularly checking our page or subscribing to our email list for updates.

If you have any questions or concerns, you can contact our customer support team at: []

3. COLLECTED PERSONAL DATA AND METHODS OF COLLECTION

As SKYMOD, we collect various types of data to provide and improve our Services.

Personal data means any information relating to an identified or identifiable natural person, either alone or in combination with other information.

Your personal data may be provided directly by you through the following means:

- Using our websites, products, or Services,
- Contacting us for support or information requests,

- Sharing via surveys, registration forms, or other interaction tools.

In addition to that, we employ indirect data collection methods through our websites and Services, such as:

- Recording usage data through cookies and similar technologies,
- Collecting interaction and usage information via software or applications running on your device.

To the extent permitted by law, we may also obtain data from publicly available sources or reliable third parties. For example, statistical data or demographic information may be acquired to support our Services.

Your personal data may be processed and transferred in accordance with the purposes set forth under the heading “Your Processed Personal Data and Purposes of Processing,” provided that explicit consent is obtained pursuant to Article 5(1) of Law No. 6698, or within the scope of the personal data processing conditions and purposes specified in Article 5(2) or relevant provisions of Article 6 of the Law No. 6698.

We process your personal data for the purpose of ensuring the secure and efficient operation of our Services, including but not limited to fulfilling our legal obligations, such as tax and accounting requirements, prevention, detection, and prosecution of possible fraud and cyberattacks, and when explicitly prescribed by laws.

The personal data processed within this scope, along with their purposes and legal grounds, are as follows:

Contact Data:	
Processed Data	Purpose of Personal Data Processing
Phone Email IP Address Address	• Conducting Communication Activities • Conducting / Auditing Business Operations • Managing Goods / Services Sales Processes • Conducting Activities for Customer Satisfaction • Providing Post-Sale Support Services for Goods / Services • Managing Contractual Processes
Legal Grounds	Your personal data may be processed and transferred in accordance with the purposes set forth under the heading “Your Processed Personal Data and Purposes of Processing,” provided that explicit consent is obtained pursuant to Article 5(1) of Law No. 6698, or within the scope of the legal grounds specified in subparagraphs “a, c, ç, and e” of Article 5(2) of the same Law, as follows: • Explicitly stipulated by laws, • Necessary for the establishment or performance of a contract ,provided that it is directly related to the contract and the

	processing of personal data belonging to the parties to the contract, • Necessary for the data controller to fulfill its legal obligation, • Necessary for the establishment, exercise, or protection of a right. Your personal data may be processed and transferred within the scope of these legal grounds.
Identity Data:	
Processed Data	Purpose of Personal Data Processing
Name Surname	• Conducting Communication Activities • Managing Goods / Services Sales Processes • Providing Post-Sale Support Services for Goods / Services • Conducting Activities for Customer Satisfaction • Managing Contractual Processes
Legal Grounds	Your personal data may be processed and transferred in accordance with the purposes set forth under the heading “Your Processed Personal Data and Purposes of Processing,” provided that explicit consent is obtained pursuant to Article 5(1) of Law No. 6698, or within the scope of the legal grounds specified in subparagraphs “a, c, ç, and e” of Article 5(2) of the same Law, as follows: • Explicitly stipulated by laws, • Necessary for the establishment or performance of a contract ,provided that it is directly related to the contract and the processing of personal data belonging to the parties to the contract, • Necessary for the data controller to fulfill its legal obligation, • Necessary for the establishment, exercise, or protection of a right. Your personal data may be processed and transferred within the scope of these legal grounds.
Processing Security Data	
Processed Data	Purpose of Personal Data Processing
IP information Log records Cookies Website Access and Exit Information	• Ensuring Compliance with Legal Regulations • Conducting Business Operations / Audits • Ensuring Transaction Security • Providing Post-Sale Support Services for Goods / Services

Legal Grounds	Your personal data may be processed and transferred in accordance with the purposes set forth under the heading “Your Processed Personal Data and Purposes of Processing,” provided that explicit consent is obtained pursuant to Article 5(1) of Law No. 6698, or within the scope of the legal grounds specified in subparagraphs “a, ç, and f” of Article 5(2) of the same Law, as follows: • Explicitly prescribed by laws, • Necessary for the data controller to fulfill its legal obligations, • Processing is mandatory for the legitimate interests of the data controller without harming the fundamental rights and freedoms of the relevant person. Your personal data may be processed and transferred within the scope of these legal grounds.
Processing Security Data: Financial Data	
Processed Data	Purpose of Personal Data Processing
Bank Account Number Invoice Information IBAN Number	• Execution of Activities in Compliance with Legislation • Execution / Auditing of Business Operations • Ensuring Transaction Security
Legal Grounds	Your personal data may be processed and transferred in line with the purposes stated under the heading “Your Processed Personal Data and Purposes of Processing” and in accordance with Article 5(1) of Law No. 6698, based on the condition of obtaining explicit consent, or within the scope of the data processing conditions and purposes specified in Article 5(2), subparagraphs “a, ç, and f” of the Law, which are: • It is explicitly stipulated by law, • It is necessary for the data controller to fulfill its legal obligations, • Provided that it does not violate the fundamental rights and freedoms of the data subject, it is necessary for the legitimate interests of the data controller. Within this legal framework, your personal data may be lawfully processed and transferred.

4. Cookies and Tracking Technologies

While delivering and improving our Services, we use cookies and similar tracking technologies to enhance your experience, analyze usage habits, and provide you with personalized content.

4.1. What Are Cookies?

Cookies are small text files placed on your device by a web server with your consent. These cookies may serve various purposes:

Essential Cookies/Strictly Necessary Cookies: These are essential for the proper functioning of the Website and Services. They are required for functions such as system administration and the prevention of fraudulent transactions. If blocked, certain services may not function properly.

Functional Cookies: These cookies are used to provide you with a more advanced and user-friendly experience—for example, remembering your preferences. As explained in detail below, you can disable the use of these cookies.

Analytical/Performance Cookies: These cookies help us improve the Website by analyzing your usage patterns. As explained below, you can choose to disable these cookies.

Targeting/Advertising Cookies: First- and third-party cookies may be used to deliver ads and content that may be of interest to you. As explained below, you may disable these cookies; however, doing so will not eliminate advertisements entirely—it will only result in displaying more generic content instead of personalized ads.

With your consent, the following types of cookies may be used:

- **Session Cookies:** These are temporary cookies that remain on your device only during your session or until you delete them. They are used to track your actions and preferences on the site.
- **Persistent Cookies:** These are used to differentiate user sessions and enhance the web experience. They may also be used by third-party service providers (especially advertising services). These cookies can remember web pages and collect certain personal data, such as IP addresses.

Managing Cookies:

Most browsers accept cookies automatically. You can block cookies or set your browser to notify you before accepting them. Disabling cookies may affect the proper functionality of some features of the services. For more information on how to block or delete cookies in various browsers, visit www.aboutcookies.org.

This Policy only covers SKYMOD's use of cookies and does not apply to third-party cookies.

4.2. Web Beacons and Pixel Tags

In addition to cookies, our websites may also use similar technologies such as web beacons and pixel tags. These technologies are used to improve user experience, understand preferences, and enhance our services.

- **Web Beacons:** Transparent graphics embedded in websites or emails. For example, when you click a link in an email, we may track your visit to the site and collect information about your preferences.
- **Pixel Tags:** Help us determine whether the emails we send are opened.

If you do not wish to be tracked, you can unsubscribe from our mailing lists at any time. This will prevent tracking via web beacons and pixel tags.

4.3. Third-Party Links

Our Services may contain links that redirect you to other websites. These websites may operate independently and have their own privacy policies. Therefore, we recommend that you review their privacy policies before visiting these sites. Please note that if a linked website is not under our control, we disclaim any responsibility for the content or privacy practices of such website(s).

5. Purposes of Use of Your Personal Data

The personal data we collect is used solely for the purposes listed below and only to provide, maintain, and improve our Services:

- **Service Provision and Management:** Operation of the Services, delivery of features, and execution of order/invoice processes,
- **Customer Support:** Responding to questions and requests, providing technical support, managing job applications, and other service-related inquiries,
- **Marketing and Communication (With Required Consent):** Newsletters, updates, promotional information, invitations to events or surveys; you may withdraw your consent for marketing communication at any time,
- **Service Improvement:** Analyzing usage patterns, troubleshooting, enhancing functionality, and optimizing user experience,
- **Legal Compliance:** Fulfilling legal obligations, enforcing terms of service, protecting rights and interests,
- **Security and Fraud Prevention:** Detection and prevention of security breaches, fraud, or unauthorized activities,
- **Third-Party Service Providers and Business Partners:** Involving third parties offering services such as web hosting, data analytics, payment processing, order management, IT infrastructure, email delivery, auditing, or distribution; such third parties may use the data for service delivery and improvement purposes.

Your personal data will only be used for the purposes described in this Policy or where legally permitted. For any materially different or additional use, your prior consent will be obtained.

6. Parties to Whom Your Personal Data May Be Transferred and Purposes of Transfer

Your personal data may be transferred, in accordance with applicable legislation and after ensuring the necessary technical and administrative measures to maintain an appropriate level of security, to the following parties within Turkey or abroad; our shareholders, subsidiaries, and affiliates, our group companies, suppliers, and business partners, authorized public institutions and organizations as permitted by relevant legislation, legally authorized private persons, lawyers or law firms for the purpose of following up on legal matters, domestic and foreign entities with which we have contractual service agreements or cooperate to conduct our operations. Such transfers are carried out in compliance with the personal data transfer conditions set forth in Articles 8 and 9 of Law No. 6698.

7. RIGHTS OF THE DATA SUBJECT UNDER ARTICLE 11 OF THE KVKK (*Personal Data Protection Law*)

As a data subject, you have the following rights:

- To learn whether your personal data is processed,
- To request information if your data has been processed,
- To learn the purposes of processing and whether your personal data is used in accordance with these purposes,
- To learn the third parties to whom your personal data is transferred domestically or abroad,
- To request correction of incomplete or inaccurate personal data and notification of this correction to third parties to whom the data was transferred,
- To request deletion or destruction of your personal data if the reasons for processing no longer exist, and notification of this to third parties,
- To object to the processing of your personal data solely through automated systems and prevent results that are unfavorable to you,
- To request compensation for damages in case of unlawful processing of your personal data.

To exercise these rights, you can submit your application containing your identity information and request to the Data Controller in accordance with the Regulation on the Procedures and Principles of Application to the Data Controller, either in person, through a notary public, by registered mail, or by secure electronic signature to the following address: []. Your requests will be concluded as soon as possible, but no later than 30 (thirty) days. If there is an additional cost for processing the request, the fee determined by the Personal Data Protection Board will be applied.

8. HOW TO CONTACT US AND UPDATES TO THE PRIVACY NOTICE

We value your feedback. If you have any questions or comments regarding this Privacy Notice, please contact us at [].

SKYMOD reserves the right to update or modify this Policy at any time. In the event of any changes to the Policy, the most current Privacy Policy will be published on this page. Your continued use of the website and Services after any changes or updates constitutes your acceptance of the updated Privacy Notice. Please check this page regularly to stay informed.