

	OPENBOX AUTOMAT SYSTEMS INFORMATION NOTICE	Document no	PDPL – 3.9.1
		Version no	v.1.0
		Release date	23.03.2026

Openbox Automat Systems Information Notice on the Processing of Personal Data

We would like to inform you about our practices regarding the processing of your personal data and the personal data we process as the “Data Controller” under the Personal Data Protection Law No. 6698 (“Law”) as Zer Merkezi Hizmetler ve Ticaret Anonim Şirketi (“KoçZer”).

This text contains the information notice regarding the processing of personal data on the website www.openboxotomat.com.tr (“Website”/“Site”) owned by KoçZer, as well as within other customer relationship processes.

1. What Are Our Objectives for Processing Your Personal Data and What Personal Data Do We Process?

Communication and Support Processes: If you contact us or share requests/complaints/suggestions via our communication channels (calls through the call center, sending emails, messaging via social media accounts, filling out quote, support, or contact forms on the Site), your identity (name, surname), contact (address, email address, phone number), professional (institution and position, company title, sector, number of employees), customer transaction (details of the sent message [date, time, content, etc.], your requests and complaints and related details [date, content, time, channel], the requested product, your responses to surveys if participated, notes taken by the customer representative regarding the call), and audio record (call center voice recordings) data will be processed for the purposes of resolving your requests, suggestions, and complaints; contacting you regarding these when necessary; providing quotes for products and services; accessing your commercial transaction records such as sales/order/cancellation/refund etc. in necessary cases to resolve your request/complaint; sending notifications via email and/or SMS for the execution of business processes; conducting studies to improve customer satisfaction and service quality; and performing internal audit and quality activities.

Website Usage Processes: During your visit to and use of the Website, your website usage information and log records related to your actions will be processed for the purpose of detecting and resolving technical/software errors and deficiencies encountered on the website.

Cookies: Tools such as cookies and web beacons are used on the website. For detailed information, please refer to the Cookie Notice available on the Website.

Consent and Information Notice Processes: For the purpose of fulfilling our legal obligations to provide evidence regarding approvals and information required by the legislation, your information is processed in relation to the legal transaction (date, content of the approval/information notice) and transaction security (log records of disclosure and explicit consent checkboxes, approval date and time) of the disclosure and if necessary, explicit consent texts you will approve.

Commercial Communication Processes: Your identity (full name) and contact information (phone number, email address, company address) will be processed by KoçZer for the purpose of communicating with you regarding general (non-personalized) campaigns, benefits, promotions, advertisements, notifications, marketing activities, events, announcements, and invitations; as well as for conducting surveys, ensuring customer satisfaction in relation to complaints, and/or suggesting new products.

Legal/Internal Processes: Your identity (name, surname), contact (phone number, email address, address), customer transaction (records and minutes regarding the fulfillment of your request), transaction security (your records concerning all types of approval/permission transactions on the Site), and legal transaction information (correspondence and file information regarding dispute processes) may be processed for the purposes of exercising all kinds of lawsuit, response, and objection rights against official institutions and organizations such as courts, execution offices, and arbitration committees in case of potential disputes; managing negotiation and settlement processes related to disputes; and providing you with the necessary information if you request information from

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In the event of situations such as requests and complaints regarding personal data processing operations, your identity (name, surname, signature), contact (phone number, email address), customer transaction (information regarding communications sent to you), and transaction security information (log records regarding electronic clarification and consent/permission processes, commercial communication/explicit consent approval and rejection information, and information on the clarification provided [date, method, etc.]) will be processed for the purposes of utilizing the documents and records obtained from you, fulfilling our obligations arising from the legislation, and exercising our legal rights in potential disputes.

2. *To Whom and For What Purpose Can We Transfer Your Personal Data?*

We transfer your personal data to the following recipient groups:

Official Institutions and Organizations: We transfer the information requested from us to authorized public institutions and organizations, courts, prosecutors, ministries, law enforcement agencies, and other judicial/administrative authorities (such as the Social Security Institution, Message Management System [İYS], and the Personal Data Protection Authority) in order to fulfill our legal notification, declaration, and audit obligations and other related responsibilities, to conduct official/judicial correspondence, to manage legal disputes and exercise our legal rights such as filing lawsuits and responses, and to fulfill obligations related to incentives benefiting our company.

Suppliers: It is transferred to our domestic suppliers from whom we receive support in relation to information technologies or the procurement of consultancy, products, or services requiring expertise, and the monitoring of the relevant processes (*including archiving companies, lawyers, maintenance and support service providers, call center, banks, independent audit firms, information technology support service providers, suppliers supporting document control/approval processes, maintenance/repair and technical support service providers, security companies, firms providing legal and financial consultancy services, Registered Electronic Mail (KEP) service providers, accountants/financial advisors, logistics companies, consultancy companies providing project support, service providers, and infrastructure and server service providers*).

Overseas Suppliers: Your personal data may be shared with suppliers due to the fact that the servers of our domestic suppliers providing IT and product support services to our company may be located abroad or that they may receive support (server system, e-mail server services, bulk e-mail delivery services and cookies service providers). (Your personal data is transferred with appropriate safeguards in place in accordance with the applicable legislation governing such transfers (standard contractual clauses).)

3. *What are the methods and legal grounds for collecting your personal data?*

We process your personal data (i) when you contact us through our accounts on social media platforms; when you fill out the contact form, support form, or quote form on the website www.openboxotomat.com.tr, and during interactions with us via our call center, email addresses, social media, and other communication channels, including the recording of your suggestions, requests, and complaints; the recording of your conversations with the call center and notes taken by a customer representative; sharing your business card; information shared with us by official, administrative, and judicial authorities via notification or digital channels; data obtained from environments where you have made your personal data public; the reuse of data you shared with us verbally or in writing during the course of your employment in various processes; and through automated methods such as logging the transactions you perform when using our company's information systems; or(ii) through non-automated methods such as written documentation during pre-contractual discussions, at the time of contract signing, and through the completion of audit forms as part of audit processes, the recording of written forms or

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documents you submit in person, and the sharing of information with us by official, administrative, and judicial authorities via notification.

We process your personal data obtained through the aforementioned methods based on the following legal grounds specified separately for each of the processing purposes listed above:

- Data will be processed in the context of communication and support processes, as well as website usage processes, based on the legal grounds that “data processing is necessary for the legitimate interests of the data controller, provided that it does not infringe upon the fundamental rights and freedoms of the data subject” and “data processing is necessary for the establishment, exercise, or defense of a legal claim”.
- In Legal/Internal processes, data will be processed based on the following legal grounds: “compliance with a legal obligation,” “the necessity of data processing for the establishment, exercise, or defense of a legal claim,” and “the necessity of data processing for the legitimate interests of the data controller”.
- With regard to consent and information notice processes, data will be processed based on the legal grounds of “fulfillment of a legal obligation” and “necessity for the establishment, exercise, or defense of a legal claim”.
- With regard to mandatory cookies, data will be processed based on the legal grounds of “the necessity of processing data for the legitimate interests of the data controller provided that such processing does not harm the fundamental rights and freedoms of the data subject” and “the explicit consent you will provide regarding functionality and performance-analysis and marketing/tracking cookies”.
- Within the scope of the tradesman/merchant exception under the commercial communication legislation regarding commercial communication processes, data will be processed based on the legal grounds of “the necessity of processing data for the legitimate interests of the data controller, provided that it is explicitly anticipated in law and that such processing does not harm the fundamental rights and freedoms of the data subject”.

4. What are your rights?

As a data subject, we inform you that you have the following rights pursuant to Article 11 of the Law:

- The right to learn whether personal data is being processed,
- The right to request information if personal data has been processed,
- The right to learn the purpose of personal data processing and whether the data is being used in accordance with that purpose,
- The right to know the third parties to whom personal data has been transferred, either domestically or abroad,
- The right to request the correction of personal data if it has been processed incompletely or inaccurately, and to request that the correction be communicated to third parties to whom the personal data has been transferred,
- The right to request the deletion or destruction of personal data when the reasons requiring its processing no longer exist, even if it has been processed in accordance with Law No. 6698 and other relevant legislation, and to request that such action be communicated to third parties to whom the personal data has been transferred,
- The right to object to the emergence of a result that is prejudicial to the individual by means of the analysis of processed data exclusively through automated systems,
- The right to request compensation for any damage suffered due to the unlawful processing of personal data.

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You can submit your applications regarding the rights listed above to our Company by completing the Data Subject Application Form available at https://www.koczer.com/uploads/Veri_Sahibi_Basvuru_Formu_4726cf3b20.pdf. Depending on the nature of your request, your application will be processed free of charge as soon as possible and no later than thirty days; however, if the process incurs an additional cost, a fee may be charged to you in accordance with the tariff determined by the Personal Data Protection Board.