**PRIVACY POLICY**

This Privacy Policy aims to determine the terms and conditions regarding the usage of personal data that are shared with CENTRA UZMAN HUMAN RESOURCES AND TECHNOLOGY INDUSTRY AND TRACE INC. (the "Company") by the users/members/visitors of the Site (the "Data Subject") during the operation of the website of www.sanaluzman.com.tr (the "Site"), being operated by the Company, or generated by the Data Subject at the time the membership to the Site is established or during the usage of the Site.

**The Data Subject hereby agrees and acknowledges that s/he is informed of the processing of her/his personal data through this Privacy Policy, and that s/he consents to the usage of her/his personal data in accordance with the conditions stated herein.**

**Terms**

**Explicit Consent :** means the consent provided by freewill in relation to a specific subject, based on being informed. **Anonymization of**
**Personal Data** : means making personal data impossible to associate with an identified or identifiable natural person by any means, even if such data is matched with other data.
**Chairman** : means the Chairman of the Personal Data Protection Board.
**Related Person :** means natural person whose personal data is processed.
**Personal Data** : means all types of information relating to an identified or identifiable natural person. **Sensitive Data** : means personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership to associations, foundations or trade-unions, health, sexual life, convictions and security measures, and the biometric and genetic data. **Processing of**
**Personal Data** : means any operation performed upon personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making retrievable, classification or preventing the use thereof, fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means.
**Board** : means the Personal Data Protection Board.
**Authority** : means the Personal Data Protection Authority.
**Data Processor :** means naturel or legal person processing personal data on behalf of the Data Controller or based on the authority given by the Data Controller,
**Data Recording System:** means a recording system in which the personal data is processed by structuring according to certain criteria.
**Data Controller** : means natural or legal person who determines the purpose and means of processing personal data and is responsible for establishing and managing the data registry system.

**Which Data are Processed?**

In this paragraph which data are considered as personal data under the Personal Data Protection Law and are processed by the Company are listed. Unless otherwise is stated explicitly, the "personal data" shall include the following information within the scope of the terms and conditions provided in this Privacy Policy.

- *Identity Information (Name, Surname, Republic of Turkey Identity Number)*
- *Contact Information (Address, Mobile Number)*
- *Location Data*
- *Membership Information*
- *Financial Information*
- *Personnel Information*
- *Sensitive Data*
- *Request /Complaint Management Information*

The Data Subject may share her/his "sensitive data" with the Company on the Site, and in these cases, the Data Subject hereby explicitly consents to the processing of such data within the scope of this Privacy Policy, and for the purposes stated herein.

Data that are irrevocably anonymised as per articles 3 and 7 of the Personal Data Protection Law, shall not be considered as personal data under the provisions of such articles and processing activities regarding such data shall be carried out without being subject to the provisions of this Privacy Policy.

**For Which Purposes are the Data Used?**

At the stage of being a member of the Site, certain personal data are shared with the Site by the data subject in order to reach the usage purposes of the Site. Such data may include; name, surname, Republic of Turkey identity number, address, mobile number. Such information is requested to be provided with by the data subject to be a member to the Site and are retained by the Site.

The Company may process personal data in accordance with articles 5 and 8 of the Personal Data Protection Law and/or the exceptions specified in the relevant regulations without obtaining the consent of the Data Subject and transfer the same to third parties. Such cases, *inter alia*, may include the following:

- When it is expressly permitted by any law;
- When it is necessary to protect the life or physical integrity of the data subject or another person where the data subject is physically or legally incapable of giving consent;
- When it is necessary to process the personal data of parties of a contract, provided that the processing is directly related to the execution or performance of the contract;
- When it is necessary to comply with a legal obligation which the controller is subject to;
- When the relevant information is revealed to the public by the data subject herself/himself;
- When it is necessary to establish, exercise or protect a right; or
- When it is necessary for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the data subject are not harmed.

**Who Can Access to the Data?**

The Company may transfer the personal data of the data subject and the new data derived by using such personal data, to third parties whom it provides services from in order to accomplish the purposes determined under this Privacy Policy and limited with the purpose of providing such services.

The Company may transfer to third parties such as outsource service providers, hosting service providers, law firms, research companies, call centres, including those which send text messages, in order to enhance the experiences of Data Subject (including improvement and customization), provide security to Data Subject, to detect fraudulent or unauthorized usages, to research on operational evaluation, to fix bugs regarding the services of the Site and to reach any purpose stated in this Privacy Policy.

The Data Subject, hereby agrees and consents in advance that the aforementioned third parties may store the personal data of the Data Subject in any servers located in any place in the world provided that the storage shall be limited with the purposes stated above.

**Rights of Access to Data and Request to Correct**

Under article 11 of the Law, the data subject has the right to;

- learn whether her/his personal data have been processed or not;
- request information as to processing if her/his data have been processed;

- learn the purpose of processing of the personal data and whether data are used in accordance with their purpose;
- know the third parties in the country or abroad to whom personal data have been transferred;
- request rectification where personal data are processed incompletely or inaccurately;
- request deletion or destruction of personal data;
- request notification of the operations made as per indents (d) and (e) to third parties to whom personal data have been transferred;
- object to occurrence of any result that is to her/his detriment by means of analysis of personal data exclusively through automated systems;
- request compensation for the damages in case the person incurs damages due to unlawful processing of personal data by making application to the data controller.

Such requests shall be reviewed and finalized by the Site within 30 days .

The Data Subject acknowledges that the information which is the subject-matter of this Privacy Policy are full, accurate and up-to-date, and s/he undertakes to update such information immediately when there is any change in such information. The Site shall have no responsibility in case no up-to-date information is provided with by the Data Subject.

The Data Subject accepts that s/he may not fully benefit from the operations of the Site if s/he makes any request that may lead the Site not to use any personal data of the data subject; and acknowledges that all liabilities arising therefrom shall be borne by herself/himself.

**Term of Personal Data Retainment**

The Company shall retain the personal data provided by the Data Subject for a term that is required by the processing purposes stated above.

Additionally, the Company may also retain personal data for a term of statute of limitations envisaged under the relevant legislation, limited with the purposes to defence itself within the scope of the dispute, in case any dispute arises with the Data Subject.

**Precautions Against Data Security and Undertakings**

The Company agrees and undertakes to take all necessary technical and organizational precautions for providing appropriate level of security and to conduct necessary auditing in order to;

- prevent unlawful processing of personal data,
- prevent unlawful access to personal data,
- safeguard personal data

in accordance with the terms and conditions envisaged in the relevant legislation or this Privacy Policy.

The Company may not disclose the personal data obtained in relation to the Data Subject to any third party or use for any purpose other than its processing purpose in a way that breaches the provisions of the Personal Data Protection Law and this Privacy Policy.

The Company shall not have any liability as to the privacy policy or the content of the applications, when it provides a link to other applications on the Site.

All personal data that you shared with our Site are protected though SSL coding system, and any access to your personal data by third parties outside the Site are restricted. The data you shared with the Site are not used in any way, other than the purposes and conditions stated in the Membership Agreement.

If you would like to exercise any of your rights under the law, please send your request in writing to the following address: Kozyatağı Mah. Saniye Ermutlu Sk. Şaşmaz Plaza No: 6/5-6 34742 Kadıköy / İstanbul – TR by simply signing it or send it to our recorded electronic postal address at sanaluzman@sanaluzman.com by signing it by your secured electronic signature.

The application to be made in order to exercise the rights vested as a result of being data subject and as stated above and which includes your explanation regarding the right you request to exercise, must include your identity information as well as your address, and the relevant documents certifying your identity must be attached thereto.

**Cookies**

We use Cookies so that you may benefit from our Website at utmost efficient way and your user experience can be improved. Should you not prefer us to use Cookie, you may delete or disable Cookies from the settings of your browser. However, in such case, we would like to remind you that this may affect the using of our Website. Unless you change the settings of Cookies on your browser, we shall assume that you agree our usage of cookies on this Site.

1. **What is a Cookie and Why is it Used?:** Cookies are are small files which are stored on your computer or web server through browsers by the internet sites you visit. For more detailed information on cookies, please visit: http://www.aboutcookies.org/ and http://www.allaboutcookies.org/ The main purposes why cookies are used on our Web Site are as follows :

    1.1. To improve the services we provide to you thorough increasing the functionality and performance of the Web Site, to improve the Web Site, and to provide new features on the Web Site, and to customize the features offered according to your preferences;

    1.2. To ensure the legal and commercial security of you, the Web Site and our Company.

2. **Periods of Cookies Used at our Website**

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|---|---|
| *Session Cookies* | Session cookies are temporary ones that used during our visitors' browsing session on our Web Site and are deleted when the browser is closed.<br><br>The main purpose of using such type of Cookie is to ensure the Web Site to function properly during your browsing session. For example; online forms comprised of more than one page are filled out. |

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|---|---|
| *Persistent Cookies* | Persistent cookies are the types that are used to improve the functionality of the Web Site, and to provide better and faster services to our visitors.<br><br>Such types of cookies are used to remember your preferences and are stored on your computer by browsers.<br><br>Some types of persistent cookies may be used to offer you specialized features by taking into consideration certain matters such as your purpose of using the Web Site.<br><br>With the help of persistent cookies, it is controlled whether there is any cookie stored on your device by our Web Site when you re-visit our Web Site by the same device, and if any, it is understood that you had visited the site before and the content to be communicated to you is determined based on such information, and thus we offer you a better service. |

3. **Categories of Cookies Used at our Website**

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|---|---|
| *Technical Cookies* | By technical cookies, the functioning of the web site is provided, and the pages as well as areas of the web site that do not function are determined. |
| *Authentication Cookies* | By these cookies, when the visitors log in the web site by using their passwords, it is determined that the visitors is a member of the Site on each page visited within the web site, and thus the member does not have to re-enter his/her password on every page. |
| *Flash Cookies* | They are the types of cookies that are used to activate the image or audio contents that are on the web site. |
| *Customization Cookies* | They are the types of cookies that are used to remind the preferences of the members when visiting the different pages of the different web sites. For example, your language preference is remembered. |
| *Analytical Cookies* | Analytical cookies generate analytical results on the numbers of the visitors of the web site the pages viewed on the web site, the visiting hours of the web site, scrolling of the pages of the web site. |
| Source site | Source site is used to carry sessions of the users.<br><br>[Duration] 741 days<br><br>It is possible to accept or reject by the settings of the browsers. |

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4. **Cookies Used at our Website**

| Cookie Category | Name | Explanation | Timeout |
|---|---|---|---|
| **Authentication** | ASP.NET_SessionId | Used for users to see only their own information. | 183 Days |
| **Authentication** | __RequestVerificationToken | Used to verify the web requests raised by the users. | 741 Days |
| **Customizing** | Currentlang | Records the language selected by the user and offers choices according to the same. | 741 Days |
| **Authentication** | .SANALUZMANAUTH | Used to secure the session of the users and to enable users to perform transaction only on their own information.<br>Generates **3 different singular codes with 40 characters** and hides your log-in information in the values of such codes.<br>As an example to generated cods;<br>'dd898f14bdc9dab95346cf7057db6ffdb10ba1c8' | 741 Days |
| **Analytic** | _gat | Such cookies help to collect all statistical information, and thus improve the offering and using of the site. Google helps us to understand the users better by adding social statistics and data regarding interests to such statistics.<br><br>Our Web Site uses Google Analytic cookies. Data collected by such cookies are transferred to the servers of Google located in the USA and retained in accordance with the data protection principles of Google. Please click here to have more information on the analytic data processing activities of Google and the principles on the protection of personal data. | 1 Day |
| **Analytic** | _ga | Such cookies help to collect all statistical information, and thus improve the offering and using of the site. Google helps us to understand the users better by adding social statistics and data regarding interests to such statistics.<br><br>Our Web Site uses Google Analytic cookies. Data collected by such cookies are transferred to the servers of Google located in the USA and retained in accordance with the data protection principles of Google. Please click here to have more information on the analytic data processing activities of Google and the principles on the protection of personal data. | 540 Days |
| **Analitik** | _gid | Such cookies help to collect all statistical information, and thus improve the offering and using of the site. Google helps us to understand the users better by adding social statistics and data regarding interests to such statistics.<br><br>Our Web Site uses Google Analytic cookies. Data collected by such cookies are transferred to the servers of Google located in the USA and retained in accordance with the data protection principles of Google. Please click here to have more information on the analytic data processing activities of Google and the principles on the protection of personal data. | 1 Day |
| **Technics** | ssupp.chatid | Used to recognize the user on the structure of **Live Chat**. | 183 Days |
| **Technics** | ssupp.geoloc | Used to determine the estimated location of the user on the structure of **Live Chat**. | 183 Days |

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|---|---|---|---|
| | | Helps to determine the approximate address of the user by the help of his/her IP address (city, province, post code). | |
| **Technics** | ssupp.vid | Used to manage the video transactions of the user on the structure of **Live Chat**. | 183 Days |
| **Customizing** | userObject | Records the options selected by the user and offers alternatives accordingly. | 741 Days |
| **Source Site** | Facebook | Enables Facebook users to enter our site and share information. | 741 Days |
| **Source Site** | GooglePlus | Enables GooglePlus users to enter our site and share information. | 741 Days |
| **Source Site** | Linkedin | Enables Linkedin users to enter our site and share information. | 741 Days |

5. **Is It Possible to Avoid Usage of Cookies by Data Subjects?**

You may customize your cookies preference by changing the settings of your browser.

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| AOL | https://help.aol.com/articles/restore-security-settings-and-enable-cookie- settings-onbrowser |
| Google | https://support.google.com/ads/answer/2662922?hl=en Adwords |
| Google Analytics | https://tools.google.com/dlpage/gaoptout |
| Google Chrome | http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647 |
| Internet Explorer | https://support.microsoft.com/en-us/help/17442/windows-internet-explorer- delete-managecookies |
| MozillaFirefox | http://support.mozilla.com/en-US/kb/Cookies |
| Opera | http://www.opera.com/browser/tutorials/security/privacy/ |
| Safari: | https://support.apple.com/kb/ph19214?locale=tr_TR |

**Revisions to the Privacy Policy**

The Company may revise the provisions of this Privacy Policy at any time. The Up-to-date Privacy Policy shall enter into force as of the date submitted to the Data Subject in any method.