The purpose of this Privacy Policy is to determine the terms and conditions regarding the use of personal data provided to SNI by the company officials authorized by the Company ("Users") who use the "Pano Sign" product ("Product") provided by SNI Teknoloji Hizmetleri Anonim Şirketi ("SNI") and/or obtained from the Company and Users during the use of the Application. The definitions in the Application Usage Agreement will be taken into account in the interpretation of the expressions not defined in this Privacy Policy. The User will become bound by this Privacy Policy upon accepting the Application Usage Agreement.

What Data Is Processed?

Under this heading, the data processed within the scope of the Application offered by SNI and considered personal data in accordance with the Personal Data Protection Law are listed. Unless otherwise explicitly stated, the term "Personal Data" within the scope of the terms and conditions presented in this Privacy Policy defines the information below.

SNI collects the following data provided by the User in a digital environment during membership login or use of the Application.

- Name, surname, business or private e-mail address, TR ID Number, telephone number
- Passwords and similar security information used for authentication and account access

SNI can obtain information about the Company and the User's use of the Application using cookies, which are technical communication files. The following data is collected through cookies to determine access to the services offered on the Application and usage habits.

- Browser Type
- ROPE
- Operating System
- System Entries
- Display Time

- Connected device brand and model

Data that is rendered irreversibly anonymous in accordance with Articles 3 and 7 of the Personal Data Protection Law will not be considered as personal data in accordance with the provisions of the said law, and processing activities related to this data will be carried out without being bound by the provisions of this Privacy Policy.

For What Purposes Are Data Used?

SNI may process the personal data provided by the User and the new data generated by SNI using this personal data in order for the Company and the User to benefit from the Application, to provide and improve the services subject to the Application, to fulfill the personal data usage purposes set out in this Privacy Policy and Application Usage Agreement and to achieve these purposes, to fulfill the obligations arising from the nature of the services, to conduct market research, to send commercial electronic messages such as advertising and marketing campaigns belonging to SNI or third parties within the framework of the relevant legislation, and to fulfill all legal obligations.

SNI may obtain information about the Company and Users' use of the Application by using cookies, which are technical communication files, and may process data within this scope and transmit it to third parties for the purpose of processing within the scope of analysis services offered by third parties, only to the extent required by these analysis services. The technical communication files in question are small text files that the Application sends to the User's browser to be stored in the main memory. The technical communication file facilitates the use of the Internet in this sense by storing the status and preference settings about a website. The technical communication file is designed to obtain statistical information about how many people use the Application in a timely manner, for what purpose, how many times a person visits the Application and how long they stay, and to help dynamically generate advertisements and content from user pages specially designed for Users, and is used for these purposes. The technical communication file is not designed to obtain any other personal data from the main memory. Most browsers are initially designed to accept technical communication files, but users can always change their browser settings so that technical communication files are not received or a warning is given when technical communication files are sent.

In order to identify and promptly resolve system-related issues, SNI identifies and uses Users' IP addresses when necessary. IP addresses may also be used to authorize system access, identify Users in general, and collect comprehensive demographic information.

Who Can Access the Data?

SNI may share personal data within the scope of this Privacy Policy with third parties with whom it cooperates for the purpose of (i) fulfilling its obligations under the Application Usage Agreement and providing related services and (ii) sending commercial communications to Users for marketing and promotional purposes in accordance with the relevant legislation.

SNI may also process and share data with third parties without obtaining the User's consent in accordance with Articles 5 and 8 of the Personal Data Protection Law and/or in the presence of exceptions in the relevant legislation. The main cases are listed below:

- It is clearly stated in the laws,
- If it is necessary for the protection of the life or physical integrity of a person or someone else who is unable to give his consent due to a physical impossibility or whose consent is not legally valid,
- Processing of personal data is necessary, provided that it is directly related to the establishment or execution of a contract, including the Application Usage Agreement, It is mandatory to fulfill legal obligations,
- It has been made public by the User himself,
- Data processing is mandatory for the establishment, exercise or protection of a right,
- Data processing is necessary for SNI's legitimate interests, provided that it does not harm the fundamental rights and freedoms of the User.

SNI has the right to transfer personal data to its servers located anywhere in the world outside the country of residence of the User (the servers may belong to itself, its affiliates, subcontractors or outsourcing service providers) in order to receive hosting services, limited to the fulfillment of the above-mentioned purposes.

About the Right to Access Data and Requests for Correction By applying to SNI, the user can obtain information about himself/herself;

- Learning whether personal data is being processed,
- To request information regarding the processing of personal data,
- To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- To know the third parties to whom personal data is transferred, either domestically or abroad,
- To request correction of personal data if it is processed incompletely or incorrectly,
- Request the deletion or destruction of personal data within the framework of the conditions stipulated in the relevant legislation,
- Request that the correction, deletion and destruction processes carried out in accordance with the relevant legislation be notified to third parties to whom personal data has been transferred,
- To object to a result that is to the detriment of the person himself/herself, as a result of the analysis of the processed data exclusively through automatic systems,
- To request compensation for damages in case of damages due to unlawful processing of personal data,

has the rights.

The user may submit the above-mentioned requests in writing to Çifte Havuzlar Mh. Eski Londra Asfaltı Cd. Kuluçka Mrk. C1 Blok No.151/E İç Kapı No:404 Esenler / İstanbul. SNI may provide its reasoned positive/negative response to the above-mentioned requests in written or digital media. It is essential that no fee is charged for the necessary procedures regarding the requests. However, if the procedures require a cost, it is possible for the Personal Data Protection Board to charge a fee based on the tariff determined in accordance with Article 13 of the Personal Data Protection Law.

The User undertakes that the information subject to this Privacy Policy is complete, accurate and up-to-date and that he/she will immediately update this information in case of any changes. SNI will not have any liability if the User does not provide up-to-date information.

The User acknowledges that he/she may not be able to benefit from the services specified in the Company's Application and Application Usage Agreement in the event that he/she makes a request that will result in his/her personal data not being used by SNI, and declares that he/she will be responsible for any and all liabilities arising in this regard.

Storage Period of Personal Data

SNI will store the personal data provided by the User for the duration of the provision of services, in order to enable the Company and the User to benefit from the Application and to provide the services subject to the Application, in order to fulfill the obligations set forth in this Privacy Policy and the Application Usage Agreement and arising from the nature of the Application and related services.

In addition, SNI may store personal data for the duration of the limitation periods determined in accordance with the relevant legislation and limited to the purpose of establishing the necessary defenses within the scope of the dispute in the event of any dispute that may arise from the Application Usage Agreement.

Data Security Precautions and Commitments

SNI, in accordance with the conditions set forth in the relevant legislation or expressed in this Privacy Policy, communicated to it electronically through the Application,

- unlawful processing of personal data,
- unlawful access to personal data,
- To take the necessary technical and administrative measures to ensure the appropriate level of security in order to ensure the protection of personal data and to have the necessary audits carried out.

undertakes.

SNI cannot disclose the personal data it obtains about Users to anyone else in violation of this Privacy Policy and the Personal Data Protection Law and cannot use it for purposes other than its intended purpose.

If links are provided to other applications through the application, SNI does not bear any responsibility for the privacy policies and content of the applications.

Changes to Privacy Policy

SNI may change the provisions of this Privacy Policy at any time by publishing it on the Application. The provisions of the Privacy Policy amended by SNI shall become effective on the date of publication.