

CLARIFICATION TEXT FOR THE PROTECTION AND PROCESSING OF PERSONAL DATA

Picus Security Inc. ("Picus" or "Company"), which is a pioneer in violation and attack simulation technologies, serves many institutions and organizations domestically and abroad with its new and integrated approach in the field of information technologies. For the Picus, which works on security services in the field of information technologies, protecting personal data is extremely important.

Picus has set a target to act in accordance with the Personal Data Protection Law ("PDPL") numbered 6698 that is in force in Turkey and with other legal practices accepted in the international arena as well. In this context, this Clarification Text for the Protection and Processing of Personal Data ("Clarification Text") has been prepared in order to enlighten the relevant persons regarding general conditions regarding how and for what purpose the Personal Data is processed, how they are protected and how long they are stored by Picus, from its customers, potential customers, suppliers, business partners and their employees and officials, visitors, employees, ex-employees and candidate employees, and also to third parties whose personal data is processed for business transactions while maintaining their business relations with Picus.

All the concepts and expressions in this Clarification Text will express the meaning ascribed to them in PDPL and other legislation.

In the event of inconsistency between the KVKK and other relevant legislative provisions and this Clarification Text, the KVKK and other relevant legislative provisions will be applied first. Our company takes the necessary technical and administrative measures to ensure the security of personal data. This text can be changed if deemed necessary according to the current legislation and the practices of our Company. You can access the final version of the text from our website www.picussecurity.com ("Website").

1. THE CONDITIONS OF PROCESSING PERSONAL DATA

All personal data processed by Picus are processed in accordance with PDPL and related legislation. In accordance with Article 4 of PDPL, the basic principles to be applied in the processing of your personal data are listed.

The personal data are processed by Picus;

- With the purchase of Picus products and / or services;
- When you offer products or services to Picus;
- When you contact Picus by any means;
- When you request or choose to receive commercial electronic messages we send for marketing;
- When you apply for a job at Picus and / or start working at Picus;
- When you attend our events and organizations organized by Picus and
- When you visit our Website

in accordance with the rules determined in this Clarification Text and / or its annexes.

Picus complies with the rules stated in the scope of PDPL and the following basic principles:

- Processing in accordance with the law and honesty rule.
- Ensuring that personal data are accurate and up to date when necessary.
- Operation for specific, clear and legitimate purposes.
- Being connected, limited and restrained for the purpose for which they are processed.

- Storage for the period required by the relevant legislation or for the purpose for which they are processed.

Within the scope of the services it provides, Picus processes some commercial, legal and / or personal data regarding its customers, potential customers, suppliers, business partners and their employees and officials, visitors, employees, ex-employees and employee candidates, as well as third parties whose personal data are processed in accordance with their business processes. This data will be protected as the same care that Picus apply to its own data, even if Picus does not specified as a trade secret in accordance with a contract or the applicable legislation, unless it is required by Picus to share with third parties within the scope of the service provided under the contractual relationship, unless otherwise specified in the applicable legislation.

The e-mail addresses, names and surnames, Turkish ID no, identification information, addresses or phone numbers of customers, potential customers, suppliers, business partners and their employees and officials, visitors, employees, ex-employees and employee candidates as well as third parties whose personal data are processed in accordance with their business processes, can be processed by Picus. In addition, via the website, your IP address, the start and end information about your use, the type and scope of your use, and the type of your browser and operating system are also recorded.

In addition to these, if you upload your name and surname, title, phone number, e-mail address, personal messages and similar information to the website through forms available at various locations on the Website, and thus share this information with Picus, we process this information you provide in accordance with your request and for the purposes of the services offered by Picus.

Our website uses Google Analytics, an analysis service of Google Inc. ("Google"). On the other hand, Google Analytics uses "cookies", that is, text files that are saved on your computer and enable the use of the website to be analyzed. The information generated by cookies about the use of the website is transmitted to and stored on a Google server in the USA. Upon the instruction of the operator of this website, Google uses this information to prepare reports to evaluate your use and to provide related services. The IP address transmitted from your browser within the framework of Google Analytics is not combined with other data of Google. If you do not want these cookies to be stored, you can make settings accordingly in your browser. In addition, our website uses AdWords and double-click-Cookies for statistical purposes. If you do not want these tools to be used, you can disable them by setting them in your browser. However, we would like to state that in this case, you may not be able to use all the functions on the website completely.

We use third-party cookies and our own cookies to show you personalized ads on websites. This is called "retargeting" and aims to base your clicks on the pages you browse on our website, the products you display, and the advertising space shown to you. We also use cookies as part of our online marketing campaigns to see how users interact with our website after online ads are shown, including those on third-party websites. You can delete these cookies from your browser at any time.

Special c personal data is not processed by Picus without the informed explicit consent of the relevant person.

The personal data processed may differ in relation to the products and / or services offered by Picus. Personal data collected orally, in writing or electronically via online or offline means, during the period of use of the products and services offered by Picus, are processed with the consent of the person's before the effective date of Personal Data Protection Law no. 6698 or explicit consent after the effective date of the law, or within the framework of the rules and conditions specified in the Personal Data Protection Law.

BASIC PRINCIPLES FOR PROCESSING OF THE PERSONAL DATA

Personal data is processed on condition that it is required to obtain open consent in accordance with the applicable legislation or without explicit consent, unless explicit consent is required under the applicable legislation, in line with the objectives of the services provided by Picus, in order Picus to continue its activities, to provide better service, to measure and improve the quality of its service, to determine the preferences and needs of our dealers, suppliers, customers and employees, to process and evaluate job applications, to provide communication with people who have a business relationship with our company, to comply with the current legislation, to send bulletins by e-mail and to make notifications.

The personal data will only be collected within the scope of Picus activities, will be used in connection with the purposes of collection, will be stored for the periods required by the processing purposes, will not be processed in excess of the rules and exceptions specified in the current legislation, and in cases where the reasons requiring its processing disappear, with the exception of situations arising from other legislation in force, will be deleted, destroyed or anonymized.

Keeping the personal data accurate and up-to-date is one of our primary goals. For this reason, our Company meets the technical and administrative requirements required to keep personal data accurate and up-to-date.

Only authorized persons can access personal data and unauthorized persons working in our Company and / or having a contractual relationship with our Company are prohibited from accessing personal data. In this context, we would like to state that; Our company takes the necessary measures to ensure the security and confidentiality of personal data.

2. TRANSFER OF THE PERSONAL DATA

Transfer of the Personal Data Domestically

Picus is under the responsibility of acting in accordance with primarily art. 8 of PDPL and the decisions and related regulations envisaged in the PDPL and taken by the Board. As a rule, personal data and special categories of data cannot be transferred to other real persons or legal entities by Picus without the explicit consent of the relevant person.

However, in cases foreseen in Articles 5 and 6 of PDPL, transfer is possible without the explicit consent of the relevant person. Picus, in accordance with the conditions stipulated in PDPL and other relevant legislation and by taking the security measures specified in the legislation; can transfer the personal data to third parties unless otherwise arranged in law or other relevant legislation in Turkey.

Transfer of the Personal Data Abroad

Picus can transfer the personal data abroad by processing the personal data in Turkey or to be processed and stored outside of Turkey, in accordance with the conditions foreseen in PDPL and by taking security measures specified in the legislation.

We transfer your personal data abroad by taking the necessary technical and administrative measures, through cloud informatics technology, to take advantage of the opportunities of technology in order to carry out our company activities in the most efficient way and to provide services at world standards.

We work with the above mentioned service providers for the purposes of developing our websites and platforms, increasing the variety of products and services and measuring the user experience according to the preferences of our customers and users. We would like to point out that you should also review the policies of the relevant service providers, as Picus has no responsibility for the policies of the respective service providers for processing personal data.

3. RIGHTS OF THE RELEVANT PERSON

Regarding the processing of personal data, according to the definition specified in the legislation, the data controller is Picus Informatics Security trade INC.

In accordance with Article 11 of PDPL, the relevant persons have the right of, by applying to Picus; Learning whether your personal data is processed, requesting information if it is processed, requesting the purpose of processing your personal data and whether it is used in accordance with its purpose, knowing the third party people that the person data is transferred, requesting correction of personal data if it is incomplete or incorrectly processed, requesting the deletion or removal of your personal data, requesting a notification for the third parties to whom their personal data are transferred about the deletion or removal process, objecting to the emergence of a result against you by analyzing your processed personal data exclusively with automated systems, and requesting the compensation of your loss if you are harmed due to illegal processing of personal data.

To use these specified rights arising from the current legislation, you need make a written application to address of the company given below or fill in the Application Form with the registered electronic mail (REM) address, secure electronic signature or mobile signature by adding the following information and documents according to Article 13 of PDPL; Your name and your last name and the signature, if you are a citizen of the Republic of Turkey, your Turkish ID number, if you are not a citizen of Republic of Turkey, your nationality, passport number, if you have, your ID number, your location, or workplace address that is set for notifications, main e-mail address and telephone number that are set for notifications and your demand issues, and other necessary information and documents to be used for identification.

The application made by you or representative authorized person will be evaluated by our Company and concluded free of charge within thirty days.

Application methods and addresses are as follows:

Application methods	The addresses where application can be made
The applicant, can apply by filling out the Application Form with the necessary information and documents that is required to determine his/her identity by coming to the address of Picus Security Inc..	www.picussecurity.com
The applicant, him/herself or by a Proxy who is authorized to represent, can apply by filling out the Application Form and sending it to the address of Picus Informatics Security trade INC. through notary or certified mail.	Üniversiteler Mah. 1596 Cad. Arge 1 No:12 Beytepe 06800 Çankaya/ ANKARA
The applicant can apply with an electronic mail registered with a secure electronic signature.	picusbilisim@hs01.kep.tr