

SİMSOFT TEKNOLOJİ ANONİM ŞİRKETİ

SUPPLIERS AND BUSINESS PARTNERS PRIVACY NOTICE

INDEX

1. Identity of the Data Controller	2
2. Scope of Application	2
3. Your Personal Data Processed	2
4. Processes Arising from Defence Industry Legislation	2
5. Processing Purposes and Legal Bases	2
6. Method of Collection	3
7. Transfer	3
8. Retention Period	3
9. Supplier's Obligation to Inform	3
10. Your Rights as a Data Subject and Method of Application	4
11. Effective Date and Updates	4

1. Identity of the Data Controller

Pursuant to Personal Data Protection Law No. 6698 (the "Law"), your personal data are processed by SİMSOFT TEKNOLOJİ ANONİM ŞİRKETİ (the "Company") in its capacity as data controller, within the scope set out below.

Trade Name	SİMSOFT TEKNOLOJİ ANONİM ŞİRKETİ
Address	Üniversiteler Mah. İhsan Doğramacı Blv. ODTÜ Teknokent SATGEB Bölge Ortak Bina 1. Kat AR-GE Ofisi 06800 ODTÜ Çankaya/Ankara/TÜRKİYE
Telephone	+90 850 840 00 46
E-mail	kvkk@simsoft.com.tr
Registered Electronic Mail (KEP)	simsoft@hs02.kep.tr
Website	www.simsoft.com.tr

2. Scope of Application

This Privacy Notice applies to natural person suppliers, business partners, consultants and subcontractors that are in a goods or services supply relationship with our Company, and to the authorised representatives, employees and contact persons of legal entity suppliers.

3. Your Personal Data Processed

Data Category	Data Processed
Identity	Name, surname, signature; Turkish Republic identity number where required by legislation
Contact	Address, telephone number, e-mail address, KEP address
Professional Information	Information on title, position, and powers of representation and signature; professional competence and certification information
Finance	Bank account information and invoice information in respect of natural person suppliers
Legal Transaction	Contract records, correspondence, minutes, confidentiality undertakings
Physical Premises Security	Entry-exit records and CCTV recordings during facility visits

4. Processes Arising from Defence Industry Legislation

Security measures are implemented at our Company's facilities within the scope of Defence Industry Security Law No. 5202 and the Defence Industry Security Regulation. Where the supply relationship requires access to classified information, documents, projects or materials, certification processes relating to facility and personnel security may be conducted pursuant to the said legislation, visit and access requests may be notified to the competent authorities, and the information and documents prescribed by the legislation may be requested in this context. Personal data processed in these processes are based on the legal basis of being expressly provided for by law.

5. Processing Purposes and Legal Bases

Processing Purpose	Legal Basis	Article of the Law
Conducting the procurement process, establishing and performing the contract, and managing order, delivery and payment processes	Processing is directly related to the establishment or performance of a contract	Art. 5/2-c
Fulfilling financial, commercial and tax obligations, and maintaining the order of documents and records	Necessary for the data controller to comply with its legal obligations	Art. 5/2-ç

Fulfilling obligations relating to facility, project and personnel security, and conducting visit and access procedures, within the scope of defence industry security legislation	Expressly provided for by law; necessary for the data controller to comply with its legal obligations	Art. 5/2-a, Art. 5/2-ç
Conducting supplier evaluation and audit activities, and communication and relationship management	Necessary for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the data subject are not harmed	Art. 5/2-f
Ensuring information security, and preventing and detecting unauthorised access	Necessary for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the data subject are not harmed; necessary for the data controller to comply with its legal obligations	Art. 5/2-f, Art. 5/2-ç
Exercising the right of legal defence in disputes and establishing evidence	Necessary for the establishment, exercise or protection of a right	Art. 5/2-e

6. Method of Collection

Your personal data are collected by partially automated and non-automated means through contract and offer processes, e-mail and KEP correspondence, telephone calls, documents provided by you, facility entry records and audit activities.

7. Transfer

Your personal data may be transferred, in accordance with the conditions set out in Article 8 of the Law, to our domestic suppliers from whom we receive financial advisory, independent audit, legal consultancy and information technology services; to the project authority or prime contractor where required by the nature of the work; to authorised public institutions and organisations where notification is required under defence industry security legislation; to banks; and, upon request, to judicial authorities.

8. Retention Period

Data / Record	Retention Period
Contracts, offers and commercial documents	10 years from the termination of the contract
Documents within the scope of tax legislation	5 years from the year following the year in which they were issued
Correspondence and communication records	2 years from the termination of the relationship
Records within the scope of defence industry security legislation	For the periods prescribed in the relevant legislation
Facility entry-exit records	1 year from the date of recording
CCTV recordings	1 month from the date of recording

Upon expiry of the retention period, your personal data are erased, destroyed or anonymised within the periodic destruction intervals, not exceeding six months, set out in our Personal Data Retention and Destruction Policy.

9. Supplier's Obligation to Inform

Legal entity suppliers and subcontractors are obliged to communicate this Privacy Notice to their own employees, their subcontractors' employees and contact persons and to inform such persons that their personal data are transferred to our Company.

10. Your Rights as a Data Subject and Method of Application

Pursuant to Article 11 of the Law, you have the right to learn whether your personal data are processed; to request information in this regard if they have been processed; to learn the purpose of processing and whether they are used in accordance with that purpose; to know the third parties to whom they are transferred domestically or abroad; to request their rectification if they are incomplete or inaccurately processed; to request their erasure or destruction within the framework of the conditions set out in Article 7 of the Law; to request that rectification, erasure and destruction operations be notified to third parties to whom the personal data have been transferred; to object to the occurrence of a result against you by means of the analysis of the processed data exclusively through automated systems; and to request compensation for damages in the event that you suffer damage due to unlawful processing.

You may submit your requests concerning your rights, in accordance with the Communiqué on the Procedures and Principles for Applications to the Data Controller, by completing the Data Subject Application Form published on our website and sending it, together with documents evidencing your identity, in writing to Üniversiteler Mah. İhsan Doğramacı Blv. ODTÜ Teknokent SATGEB Bölge Ortak Bina 1. Kat AR-GE Ofisi 06800 ODTÜ Çankaya/Ankara/TÜRKİYE, with your secure electronic signature or mobile signature, or to kvkk@simsoft.com.tr via the e-mail address you have previously notified to us and which is registered in our system, or to simsoft@hs02.kep.tr via your Registered Electronic Mail (KEP) address. Your application will be concluded free of charge as soon as possible and at the latest within thirty days, depending on the nature of the request. Should the process require an additional cost, the fee set out in the tariff determined by the Personal Data Protection Board may be charged.

11. Effective Date and Updates

This text entered into force in 2026. The Company reserves the right to update the text in line with legislative amendments, decisions of the Personal Data Protection Board and changes in its processing activities. The current text is published on our website.