

EMPLOYEE AND INTERN CANDIDATE PRIVACY NOTICE

As İnfina Yazılım A.Ş. (the “**Company**”), acting as the data controller within the scope of the Turkish Personal Data Protection Law No. 6698 (“**KVKK**”), we attach utmost importance to the protection of the personal data of employee and intern candidates.

In this context, pursuant to the KVKK, we would like to inform you about the purposes of processing your personal data, the transfer of your personal data, the methods by which your personal data are collected, and your rights in relation to your personal data.

a) Purposes of Processing Personal Data

Within the scope of employee and intern recruitment processes, your personal data necessary for conducting the application and evaluation process may be processed, including in particular your identity, contact, education, professional experience and curriculum vitae information.

Your personal data may be processed for the following purposes:

- Managing employee/intern candidate selection and placement processes,
- Receiving and evaluating applications from employee/intern candidates,
- Evaluating professional qualifications, experience, education, competencies and suitability for the position applied for,
- Planning and conducting interview and evaluation processes,
- Planning human resources processes,
- Communicating with candidates within the scope of the application process

Depending on the nature of the relevant personal data processing activity, your personal data will be processed on the legal grounds set forth in Article 5(2) of the KVKK, namely that *“processing of personal data belonging to the parties to a contract is necessary, provided that it is directly related to the establishment or performance of the contract”* and that *“processing is necessary for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the data subject are not prejudiced.”*

In this context, personal data processing activities relating to the receipt and evaluation of employee and intern candidate applications, communication with candidates, and the conduct of recruitment/internship processes are based, depending on the nature of the relevant process, on the legal grounds that such processing is directly related to the establishment of an employment contract and/or is necessary for the legitimate interests of our Company in identifying suitable candidates and effectively conducting human resources processes.

We kindly request that you do not include in the curriculum vitae and other information and documents you submit as part of your application any special categories of personal data that are not necessary for conducting the application process (race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other beliefs, appearance and clothing, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data), and that you do not upload documents containing such personal data.

b) Purposes for and Parties to Whom Processed Personal Data May Be Transferred

Provided that the conditions for the transfer of personal data set forth in Article 8 of the KVKK are met and limited to the purpose of the transfer, your personal data may be shared with:

- Authorized persons, public institutions and organizations, where necessary or requested, for the purpose of fulfilling legal obligations,
- Kolay Yazılım A.Ş., the provider of the Talentics platform used in our recruitment processes, for the purposes of conducting employee and intern candidate application, evaluation and recruitment/internship processes and receiving, storing and managing applications,
- Our suppliers and service providers from whom we receive information technology, e-mail, hosting and similar technical services, where necessary for the provision of such services and to the extent required by the relevant service.

c) Method and Legal Basis for the Collection of Personal Data

Your personal data are collected in accordance with the purposes specified in section (a) of this Notice and on the legal grounds set forth in Article 5(2) of the KVKK, through the channels specified below, by wholly or partly automated means or by non-automated means provided that the processing forms part of a data filing system.

In this context, your personal data are collected through:

- Your being redirected from open positions published on our Company's website to the Talentics recruitment platform and submitting an application through that platform,
- Your curriculum vitae, contact details and other application information and documents submitted by you through Talentics,
- Applications submitted through other career platforms,
- Applications and curricula vitae submitted to us via e-mail or other communication channels,

- Information provided to us through references,
- Information and documents provided by you during meetings, interviews and evaluations conducted as part of the application process.

If you wish to apply for open positions published on our Company's website, you will be redirected to the Talentics platform, which we use to conduct our recruitment processes. With respect to the personal data you submit as part of your application through the Talentics platform, İnfinia Yazılım A.Ş. acts as the data controller, while Kolay Yazılım A.Ş., the provider of the Talentics platform, processes such data as a data processor within the scope of the recruitment infrastructure services it provides to our Company.

d) Your Rights under Article 11 of the KVKK

As a data subject, if you submit your requests regarding your rights to our Company through the methods specified below, our Company will conclude your request free of charge as soon as possible and in any event within thirty days, depending on the nature of the request. However, where the transaction requires an additional cost, a fee may be charged in accordance with the tariff determined by the Turkish Personal Data Protection Board.

In this context, data subjects have the right to:

- Learn whether their personal data are being processed,
- Request information if their personal data have been processed,
- Learn the purpose of the processing of their personal data and whether such data are used in accordance with that purpose,
- Know the third parties to whom their personal data are transferred in Türkiye or abroad,
- Request the rectification of personal data if they have been processed incompletely or inaccurately and request that the action taken in this respect be notified to third parties to whom the personal data have been transferred,
- Request the deletion or destruction of personal data where the reasons requiring their processing no longer exist, despite having been processed in accordance with the KVKK and other applicable laws, and request that the action taken in this respect be notified to third parties to whom the personal data have been transferred,
- Object to the occurrence of a result against the data subject arising from the analysis of processed data exclusively by automated systems,

- Request compensation for damages suffered as a result of the unlawful processing of personal data.

In this context, you may submit your requests concerning your personal data to our Company through one of the methods set out below, using the **Data Subject Application Form**, which contains explanations regarding the information required in your application and the application methods. Use of the Data Subject Application Form is not mandatory, and applications containing the mandatory elements prescribed by applicable legislation will also be considered by our Company.

- By personally delivering your written application or sending it by post to Altunizade, Ord. Prof. Dr. Fahrettin Kerim Gökay Cd. No:38, Üsküdar/İstanbul, Türkiye,
- Through our registered electronic mail (KEP) address at infina.as@hs02.kep.tr,
- By sending an e-mail to kvkk@infina.com.tr using a secure electronic signature, mobile signature, or an e-mail address previously notified by you to our Company and registered in our systems,

or through any other methods that may be determined by the Board in the future.

Depending on the nature of the application and where it is necessary to verify that the applicant is the relevant data subject, our Company may request additional information and documents for identity and authorization verification in order to securely conclude the application and prevent the disclosure of personal data to unauthorized third parties.

e) Retention Period of Personal Data

The Company retains personal data for the period prescribed by applicable legislation or for as long as necessary for the purposes for which they are processed. Where the purposes and legal grounds requiring the processing of personal data cease to exist and, where applicable, the mandatory retention periods prescribed by applicable legislation expire, the personal data are deleted, destroyed or anonymized in accordance with applicable legislation.

f) Amendments and Updates

This Privacy Notice has been prepared within the scope of the Turkish Personal Data Protection Law No. 6698 and other applicable legislation. Necessary amendments may be made to this Privacy Notice in line with changes in applicable legislation and/or the Company's purposes and policies regarding the processing of personal data.

The current version of this Privacy Notice is made available to data subjects through our website.