



# Privacy Notice on the Processing of Personal Data of Event Participants

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## 1. Data Controller

Pursuant to the Personal Data Protection Law No. 6698 (KVKK), your personal data are processed by **DCS DİJİTAL GÜMRÜK HİZMETLERİ ANONİM ŞİRKETİ**, acting in its capacity as data controller, within the scope explained below.

You may access the [Information Notice on the Processing of Personal Data](#) under the heading Protection of Personal Data.

This Information Notice includes special provisions regarding personal data that may be processed within the scope of webinar/event activities. For data processed within this scope, the provisions of this Notice shall apply with priority.

## 2. Processed Personal Data, Purposes of Processing and Legal Grounds

The personal data that may be processed within the scope of webinars, online events, hybrid events and face-to-face organizations organized by our Company (collectively referred to as "events") are presented in the table below:

### 2.1. Personal Data Processing Matrix

Personal Data Category	Purposes of Processing	Legal Ground (KVKK)
<b>Identity and Contact Data</b> (name, surname, title, company information, e-mail address, telephone number)	Creating the event registration, sending the participation link/invitation, organizational communication, post-event information	Art. 5/2-c (establishment/performance of a contract), Art. 5/2-f (legitimate interest)
<b>Participation and Organization Data</b> (participation information, session duration, Q&A; content, attendance records)	Organization management, performance analysis, internal reporting, audit	Art. 5/2-f (legitimate interest)
<b>Visual and Audio Data</b> (if any) (camera image, audio recording, event recordings) (No identification or verification is performed through biometric methods.)	Recording the event, providing subsequent access, corporate promotion and archiving.	Art. 5/1 (explicit consent)
<b>Marketing and Commercial Communication Data</b> (if any) (communication preferences, commercial electronic message consent)	Invitations to future events, service information	Art. 5/1 (explicit consent), Law No. 6563 and relevant legislation
<b>Technical and Platform Data</b> (IP address, username, log records)	Providing technical access, system security, information security processes	Art. 5/2-f (legitimate interest)

## 2.2. Technical Infrastructure and Transfer Abroad

Events may be carried out through third-party online meeting platforms and digital communication tools. In this context, services of various information technology infrastructure providers may be used in the processes relating to the organization of the event, sending invitations, creating participant registrations, sending and collecting explicit consent forms, and conducting the event.

Due to the technical infrastructures of these service providers being located abroad, personal data may technically be processed on or transferred through servers located abroad.

Where a transfer abroad is required, the necessary legal mechanisms shall be applied pursuant to Article 9 of the KVKK.

During membership and use of the platforms, the privacy policies of the relevant platforms shall apply between the participant and the relevant platform, and the Company shall be responsible only for its own personal data processing activities.

Participants may attend the event, if they wish:

- without turning on their camera,
- without using their microphone,
- by using an anonymous nickname instead of their name and surname

If the camera or microphone is turned on, audio and image data may be seen or heard by other participants.

## 2.3. Event-Based Limitation Provision

The personal data categories listed above have been determined so as to cover all webinars, online events, hybrid events and face-to-face organizations that may be organized.

However, depending on the technical infrastructure, scope and organizational structure of the specific event, the categories of personal data to be processed may be narrower than those listed above.

The categories of personal data to be processed specifically for each event and any special processing activities, if applicable, will also be explained in the relevant invitation text, registration form or event announcement.

## 3. Transfer of Personal Data

Your personal data may be transferred to technical infrastructure providers and information technology service providers from which services are received within the scope of event organization, due to the nature of the service provision. Likewise, if the servers of such service providers are located abroad, personal data may have to be transferred abroad for technical reasons. Personal data may be required to be transferred to legally authorized public institutions and legally authorized private persons where expressly prescribed by laws and within the scope of fulfilling our legal obligations. In addition, your personal data may also be shared with the group companies with which the Company is affiliated. Such transfers are carried out within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the KVKK.

## 4. Method of Personal Data Collection

Your personal data are collected through:

- event registration forms,
- e-mail correspondence,
- online platforms,
- physical attendance lists

by automatic or partially automatic means.

## 5. Retention and Destruction of Personal Data

Your personal data, including visual and audio data obtained within the scope of webinars and face-to-face events, are retained for the purposes of organizing the event, recording it, archiving it and carrying out corporate communication activities, for the periods prescribed in the relevant legislation and for the period required by the purpose of processing.

If the purpose of processing ceases to exist, such data are deleted, destroyed or anonymized in accordance with the **Policy on Deletion, Destruction and Anonymization of Personal Data**.

Your deletion requests shall be evaluated within the framework of Articles 7 and 11 of the Law.

In this context:

- Participation and organization records (name-surname, company, title, contact details) are retained for a maximum of 2 years,
- Audio and video recordings obtained within the scope of a webinar are retained for a maximum of 1 year,
- Photograph and video recordings obtained during the event are retained for a maximum of 1 year, and are kept for the above periods.

If event recordings are planned to be used for promotional or marketing purposes, your explicit consent is also obtained separately, and the data processed within this scope are retained for the duration of the explicit consent.

## 6. Your Rights under the KVKK

We hereby inform you that, as the data subject, you have the following rights pursuant to Article 11 of the Law:

- to request information if your personal data have been processed,
- to learn the purpose of processing your personal data and whether they are used in accordance with that purpose,
- to know the third parties to whom your personal data have been transferred, domestically or abroad,
- to request correction if your personal data have been processed incompletely or inaccurately, and to request that the transaction carried out in this context be notified to the third parties to whom your personal data have been transferred,
- to request deletion or destruction of your personal data if the reasons requiring their processing cease to exist, although they have been processed in accordance with the Law and other relevant laws, and to request that the transaction carried out in this context be notified to the third parties to whom your personal data have been transferred,
- to object to the occurrence of a result against you by analyzing your processed data exclusively through automated systems,
- to request compensation for damages if you suffer damage due to unlawful processing of your personal data.

You may submit your applications regarding the rights listed above to our Company by completing the [Data Subject Application Form](#) available through our website.

Depending on the nature of your request, your applications will be concluded free of charge as soon as possible and within thirty days at the latest; however, if the transaction requires an additional cost, a fee may be requested from you pursuant to Article 13/2 of the KVKK in accordance with the tariff to be determined by the Board.



DCS Dijital Gmrk Hizmetleri A.Ŗ.

Huzur Mahallesi Azerbaycan Caddesi D Blok No:4D/3  
İ Kapı No: 317 34485 Sarıyer/İstanbul, Trkiye

+90 212 657 41 41

info@dcscustoms.com.tr

www.dcscustoms.com.tr