



Privacy Notice on the Processing of Personal Data of Event Participants

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1. Data Controller

Pursuant to the Law No. 6698 on the Protection of Personal Data ("KVKK"), the European Union General Data Protection Regulation ("GDPR"), and the relevant secondary legislation, your personal data are processed by **DCS DİJİTAL GÜMRÜK HİZMETLERİ ANONİM ŞİRKETİ**, in its capacity as data controller, within the scope described below.

You may access the [General Privacy Notice](#) on the [Protection and Processing of Personal Data](#) under the Protection of Personal Data section available on our company website.

This Privacy Notice sets forth specific provisions regarding personal data that may be processed within the scope of webinar/event activities. Accordingly, with respect to the data processed within this scope, the provisions of this Privacy Notice shall apply with priority.

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

Within the scope of our Company's corporate communication activities, your personal data may be collected and processed through verbal, written, visual or electronic means during your participation in trainings, seminars, meetings, events and organizations held for the purpose of carrying out promotional, informational and visibility activities through social media accounts, the website and other digital communication channels. Such data may be used on our Company's social media accounts or website for the purposes of announcing company activities to the public, sharing events and conducting corporate communication processes.

Our Company processes your personal data in accordance with the applicable legislation and the processing purposes specified in this Privacy Notice. In the event of any change in the purposes of processing personal data, the necessary updates shall be made and this Privacy Notice shall be republished accordingly.

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

2.1. Personal Data Processing Matrix

Personal Data Category	Purposes of Processing	Legal Ground (KVKK)
Identity and Contact Data (Name-surname, title, company name, e-mail address, telephone number, Turkish Identification Number if required for the payment-invoicing process)	Creating event registration, sending participation links/invitations, sharing programme content, organizational communication, post-event notification, evaluation surveys, preparation of certificates/certificates of participation, organization of payment processes, accounting activities, and fulfilment of legal obligations such as providing information to judicial authorities	m.5/2-c (Sözleşmenin kurulması/ifası), m.5/2-f (Meşru menfaat)
Participation and Organization Data (Participation information, session duration, questions directed to the speaker, poll results, questions asked, presentation content visuals, training/event evaluation surveys, assessment of participation statistics, analysis of feedback, etc.)	Organization management, performance analysis, internal reporting, audit, and preparation of certificates/certificates of participation	Art. 5/2-f (legitimate interest). Your personal data may be processed for the purpose of announcing webinars to broad audiences, provided that such processing is limited to the relevant purpose, proportionate, and does not prejudice the fundamental rights and freedoms of the data subject, on the grounds that processing is necessary for the legitimate interests of the data controller.

Visual and Audio Data, if any (Camera footage, audio recordings, event recordings, photographs; an announcement will be made stating that photographs and video recordings may be taken before, during or after the event for use in DCS's printed/visual publication channels and social media channels. This does not include identification and verification through biometric methods.)	Recording the event, enabling subsequent access, corporate promotion and archiving.	Art. 5/1 (explicit consent). Your explicit consent is required for the recording of your visual and audio data and for its publication on the website/social media accounts or in DCS's printed/visual publication channels.
Marketing and Commercial Communication Data, if any (Communication preferences, commercial communication consent, announcements regarding organized events and conduct of marketing activities, sending e-mails/SMS, etc.)	Future event invitations and service notifications.	Art. 5/1 (explicit consent).
Technical and Platform Data (IP address, username, log records, traffic information in online meetings)	Ensuring technical access, system security and information security processes.	Art. 5/2-a (expressly provided for by Law No. 5651 and the relevant legislation), Art. 5/2-f (legitimate interest).

2.2. Technical Infrastructure and Cross-Border Data Transfer

Events may be conducted through third-party online meeting platforms and digital communication tools. In this context, services of various information technology infrastructure providers may be used in processes relating to the organization of the event, the sending of invitations and links, the creation of participant/speaker records, training/event evaluation surveys through survey platforms, the delivery and collection of explicit consent forms, and the conduct of the event.

Due to the fact that the technical infrastructure of such service providers may be provided from abroad, personal data may technically be processed through, or transferred to, servers located abroad. E-mail services used, such as Gmail, Yahoo, Hotmail, etc.; online meeting platforms used, such as Microsoft Teams, Zoom, Google Meet, etc.; participation form applications, such as Google Docs, etc.; and participant group creation tools, such as WhatsApp, Telegram or e-mail groups, are generally provided from abroad. Applications using internet-based environments, such as websites and social media accounts, are not under the management of our Company.

In cases requiring cross-border transfer, the necessary legal mechanisms shall be implemented pursuant to Article 9 of the KVKK. Meeting infrastructure services are obtained from companies that ensure data security through standard contractual clauses recommended by the Personal Data Protection Board.

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

- Participants may, at their discretion, participate in the event:
- without turning on their camera,
- without using their microphone,
- without adding a photograph,
- by using an anonymous nickname instead of their name and surname.

Participants should take into consideration that, if the camera or microphone is turned on, their audio and visual data may be visible or audible to other participants.

Where the camera is turned on for the purpose of taking photographs in relation to participation in the meeting, it shall be deemed that consent has been given for such photography.

2.3. Information Notice Regarding Social Media Accounts

We would like to inform you regarding the processing of your personal data when you visit the social media accounts belonging to our Company.

Our Company does not have direct authority or control over the determination of the technical infrastructure, methods and processes relating to the processing of personal data in data processing activities carried out through social media platforms. Therefore, such data processing activities are largely conducted within the scope of the relevant social media platforms' own policies and practices.

You may access our Company's social media accounts through the links below:

- [Instagram](#)
- [LinkedIn](#)
- [X](#)
- [YouTube](#)

Our Company does not independently monitor or record users' activities through social media platforms, nor does it collect personal data through such platforms. Users' interaction and usage data are processed by the relevant platform providers within their own systems.

Each social media platform may process personal data through different methods and procedures within the framework of its own privacy policies. You may access detailed information regarding the processing of your personal data through the links below:

- [Instagram Privacy Policy](#)
- [LinkedIn Privacy Policy](#)

2.4. Event-Based Limitation Provision

The categories of personal data specified above have been determined so as to cover all webinars, seminars, trainings, meetings, hybrid organizations and face-to-face events 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 specified above.

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

3. Transfer of Personal Data

Your personal data may be transferred, by the nature of the provision of the relevant service, to technical infrastructure providers and information technology service providers from whom services are received within the scope of event organization. Likewise, where the servers of such service providers are located abroad, personal data may, for technical reasons, be required to be transferred abroad.

In cases where it is expressly provided for by law and within the scope of fulfilling our legal obligations, personal data may be required to be transferred to legally authorized public institutions and legally authorized private persons. In addition, your personal data may also be shared with the group companies with which the Company is affiliated.

Such transfers shall be carried out within the framework of the personal data processing conditions and purposes set forth under Articles 8 and 9 of the KVKK.

4. Method of Collection of Personal Data

Your personal data are collected through the following channels:

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

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 online and face-to-face events, are retained for the purposes of organizing, recording and archiving the event, as well as conducting corporate communication activities, for the periods prescribed under the relevant legislation and for the period required by the purpose of processing.

Where the purpose of processing ceases to exist, such data shall be deleted, destroyed or anonymized in accordance with our Company's Policy on the 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 respect:

- Participation and organization records, including name-surname, company, title and contact details, are retained for a maximum period of **2 years**;
- Audio and video recordings obtained within the scope of webinars are retained for a maximum period of **1 year**;
- Photographs and video recordings obtained during the event are retained for a maximum period of **1 year**.

Where event recordings are intended to be used for promotional or marketing purposes, your explicit consent shall be obtained separately, and the data processed within this scope shall be retained for the duration of such explicit consent.

6. Your Rights under the KVK

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

To request information as to whether your personal data have been processed;

- To learn the purpose of processing your personal data and whether such data are used in accordance with such purpose;
- To know the third parties to whom your personal data have been transferred, whether domestically or abroad;
- To request the rectification of your personal data if they have been processed incompletely or inaccurately, and to request that the transaction carried out in this regard be notified to the third parties to whom your personal data have been transferred;
- To request the deletion or destruction of your personal data in the event that the reasons requiring their processing cease to exist, despite such data having been processed in accordance with the Law and other applicable laws, and to request that the transaction carried out in this regard be notified to the third parties to whom your personal data have been transferred;
- To object to the occurrence of any result against you arising from the analysis of your processed data exclusively by automated systems;
- To request compensation for damages in the event that you suffer damage due to the unlawful processing of your personal data.

7. Method of Application to the Data Controller

In order to exercise your above-mentioned rights regarding your personal data, you may submit your application containing information verifying your identity and explanations regarding your request to our Company by completing the “Data Subject Application Form” available on our company website and using the methods specified in the relevant form. In order for the application to be duly evaluated, the necessary information and documents must be attached to the application. You may also submit your applications through a notary public or via Registered Electronic Mail (“KEP”) to our Company’s electronic mail address.

The subject matter of the request must relate to the applicant personally. Where an application is made on behalf of another person, the applicant must be specifically authorized in this regard and such authorization must be documented by a power of attorney. In addition, the application must include identity and address information, and documents verifying identity must be attached to the application. Requests submitted by unauthorized third parties on behalf of another person shall not be taken into consideration.

Detailed information regarding the procedures and principles applicable to application processes may be found in the Communiqué on the Procedures and Principles of Application to the Data Controller published by the Personal Data Protection Authority, as well as Article 13 of the Law No. 6698 on the Protection of Personal Data.

Your requests regarding your personal data shall be evaluated and concluded within 30 (thirty) days at the latest as of the date on which the application is received by our Company. In the event that your application is rejected, the reason for rejection shall be notified to you through the address or communication channel specified in your application, by electronic mail, post, or one of the methods you have selected in the Data Subject Application Form.

For detailed information, you may visit our website: www.dcscustoms.com.tr

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