

Privacy and Security Policy

Privacy Notice on the Processing of Personal Data · Last revised: 27.10.2026

Company	AltınSoft Bilişim Teknolojileri Tic. Ltd. Şti.	Tax Office / No	Babaeski / 0640383341
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This policy is the privacy notice prepared under Article 10 of the Turkish Personal Data Protection Law No. 6698 (“KVKK”) concerning the personal data processed by AltınSoft Bilişim Teknolojileri Tic. Ltd. Şti. (“ALTINSOFT”) through [www.altinsoft.com](#), the other websites it operates and the customer panel (together, the “Site”), and in connection with the services it provides. Our general principles on the processing of personal data are further explained in the Personal Data Protection Policy published on the Site. This English version is provided for convenience; in case of any discrepancy, the Turkish version prevails.

1. Data Controller

The data controller under the KVKK is AltınSoft Bilişim Teknolojileri Tic. Ltd. Şti., whose company details and contact information are given above.

2. Personal Data Processed, Purposes and Legal Grounds

Data category	Examples	Purpose of processing	Legal ground (KVKK)
Identity	Name, surname, Turkish national ID number or tax ID number, company name	Opening an account, concluding the contract, invoicing	Art. 5(2)(c) conclusion and performance of a contract; Art. 5(2)(ç) legal obligation
Contact	Email address, phone number, address	Account verification (email and SMS code), service notifications, delivery of invoices, support	Art. 5(2)(c); Art. 5(2)(ç)
Customer transaction	Cart and order records, invoice and service records, support requests and live chat messages	Providing the services, giving support, handling requests and complaints	Art. 5(2)(c); Art. 5(2)(f) legitimate interest
Financial	Payment and refund records, masked card number and the card token issued by the payment institution, bank transfer details	Collection, refunds, automatic renewal, prevention of payment irregularities	Art. 5(2)(c); Art. 5(2)(ç); Art. 5(2)(f)

Data category	Examples	Purpose of processing	Legal ground (KVKK)
Transaction security	IP address, session and login records, browser and device information, two-factor authentication records, traffic data	Ensuring information security, preventing misuse, record-keeping obligations under Law No. 5651	Art. 5(2)(ç); Art. 5(2)(f)
Identity verification	Image of the identity document, photo and video of the face, verification result	Verifying the identity of the account holder, preventing fraud	Identity document: Art. 5(2)(c) and 5(2)(f). Matching the face image with the photo on the document is processing of biometric data and relies on your explicit consent under Art. 6; consent is given by reading the information in the verification email and starting the verification
Site usage data	Visit statistics collected through cookies and similar technologies	Operation, security and improvement of the Site (see Section 5)	Strictly necessary cookies: Art. 5(2)(c) and 5(2)(f); analytics cookies: Art. 5(1) explicit consent
Marketing	Email address, phone number, message consent records	Campaign and announcement messages	Only if you give your consent (Law No. 6563 on the Regulation of Electronic Commerce and Art. 5(1) explicit consent)

Data that is not needed to receive a service is not made mandatory. Personal data is processed only for the purposes above, in a manner that is relevant, limited and proportionate to those purposes, and is not used for any other purpose.

3. Method of Collection

Personal data is collected electronically, by automated or partly automated means, through the registration, order, payment and support forms on the Site and the customer panel, live chat, email and telephone conversations, the basic profile information shared by Google, Microsoft or GitHub if you choose to sign in with those accounts, payment and identity verification service providers, and cookies.

4. Transfer of Personal Data

Your personal data may be transferred to the following recipient groups, limited to the purposes in Section 2 and in accordance with Articles 8 and 9 of the KVKK:

Recipient group	Purpose of transfer
Licensed payment institutions: İyzi Ödeme ve Elektronik Para Hizmetleri A.Ş. (iyzico), Paytr Ödeme ve Elektronik Para Kuruluşu A.Ş. (PayTR)	Carrying out payments, saving cards, preventing, investigating and detecting payment irregularities. These institutions process the data under their own privacy policies.
E-invoice service providers (Paraşüt, BirFatura)	Issuing and delivering electronic invoices
Identity verification service provider (Veriff)	Identity document and face verification

Recipient group	Purpose of transfer
SMS and email delivery service providers (Netgsm, Mutlucell, Resend)	Delivering verification codes, service notifications and invoices
Data center and infrastructure providers (including OVH)	Providing the purchased server services at the selected location
Analytics, security and content services (Google Analytics, Cloudflare Turnstile, Google reCAPTCHA, YouTube)	Visit statistics, blocking automated (bot) attacks, playing videos on the Site
Authorized public institutions and organizations, judicial authorities	Fulfilling legal obligations and requests from competent authorities
Persons from whom legal, financial advisory and audit services are obtained	Fulfilling legal and financial obligations, protecting rights

Transfers abroad. The servers of some of the service providers above are located outside Türkiye; in addition, the server service you purchase is provided in the data center in the country you select when ordering. Personal data is transferred abroad in accordance with the conditions set out in Article 9 of the KVKK (an adequacy decision, appropriate safeguards such as standard contracts, or the incidental cases listed in the Law).

5. Cookies

The Site uses cookies and your browser's local storage to operate and to stay secure:

- **Strictly necessary cookies and records:** the session cookie that keeps you signed in, the language preference, the cart key and the theme (light/dark) preference. Without them, sign-in, the cart and payment do not work.
- **Security cookies:** Cloudflare Turnstile and Google reCAPTCHA, to block automated attacks on the sign-in and registration forms.
- **Analytics cookies:** Google Analytics, to measure in aggregate how the Site is used. These cookies are used only with your explicit consent: Google Analytics is not loaded unless you click "Accept" on the notice banner shown on your first visit to the Site.
- **Third-party content:** YouTube videos on the Site are shown in YouTube's privacy-enhanced mode (youtube-nocookie.com).

You can change your choice or withdraw your consent at any time through the "Cookie preferences" link at the bottom of the Site; when you withdraw your consent, the analytics cookies are deleted from your browser. You can also delete or block cookies in your browser settings; if strictly necessary cookies are blocked, some parts of the Site may not work.

6. Retention Periods

Personal data is kept for as long as the purpose of processing requires and for the periods set out in the applicable legislation; when these periods end, it is deleted, destroyed or anonymized. The main statutory periods are:

- Invoices, books and accounting records: 5 years under Tax Procedure Law No. 213 and 10 years under Turkish Commercial Code No. 6102;
- Traffic data: not less than 1 year and not more than 2 years under Law No. 5651 and the related regulation;
- Commercial electronic message consent records: 3 years from the withdrawal of consent;
- Records needed for disputes arising from the contract: for the applicable limitation periods.

When you request the deletion of your account, your data that is not subject to a statutory retention obligation is deleted; data that must be kept is retained only for that purpose and period.

7. Security Measures

Under Article 12 of the KVKK, ALTINSOFT takes the necessary technical and administrative measures to prevent the unlawful processing of and access to personal data and to ensure its safekeeping. The main measures are:

- All communication between the Site and your browser is encrypted with TLS (SSL).
- The full card number and the card security code (CVV) are not stored in ALTINSOFT systems. Card details are transmitted to the licensed payment institution over an encrypted connection during payment; saved cards are kept only as a masked card number and the token issued by the payment institution. Where necessary, payments are verified by your bank with 3D Secure.
- Passwords are stored as an irreversible one-way hash and are never kept in plain text.
- You can use two-factor authentication on your account with a passkey, an authenticator app (TOTP) and backup codes.
- Access to personal data is limited to employees who need it for their duties; access and operations are logged. Secret keys of service providers are stored encrypted.
- If personal data is obtained by unauthorized persons, the Personal Data Protection Board (“Board”) is notified as soon as possible and within 72 hours at the latest under Article 12 of the KVKK, and the persons concerned are notified within a reasonable time.

8. Data on Customer Servers

The Customer is the data controller of the data it keeps on the server and hosting services it purchases. The Customer accepts that it processes such data on a legal ground compliant with the KVKK and that it has fulfilled its duty to inform the persons concerned.

As a rule, ALTINSOFT does not access this data. It accesses it only on the Customer’s instruction (e.g. a support request) or where required by law, and only to the extent necessary for that purpose; in that case it acts as a data processor, solely in line with the Customer’s instructions, does not process the data for its own purposes and takes the necessary security measures. When the service relationship ends, this data is deleted, subject to statutory retention obligations. These matters are set out in detail in the Data Processing Agreement published on the Site.

Under Law No. 5651, ALTINSOFT is not obliged to monitor the content its users publish through their own services; the legal responsibility for such content lies with the users.

9. Confidentiality Obligation

ALTINSOFT keeps the information it obtains from the Customer during the service relationship confidential and does not use it for purposes other than those stated in this Policy. The Customer likewise keeps confidential the non-public information disclosed to it during support and service processes (such as access credentials, internal documents and technical configuration information). Information that is public, that is learned independently of the other party, or that must be disclosed by law or by order of a competent authority is outside this obligation. The parties treat such information with at least the same care they apply to their own confidential information and inform their employees accordingly.

10. Your Rights under the KVKK

Under Article 11 of the KVKK, you have the right to apply to ALTINSOFT to:

1. learn whether your personal data is processed,
2. request information about it if it has been processed,
3. learn the purpose of processing and whether the data is used in line with that purpose,
4. know the third parties to whom your personal data is transferred in Türkiye or abroad,
5. request the correction of your data if it is incomplete or inaccurate,
6. request its deletion or destruction under the conditions in Article 7 of the KVKK,
7. request that the operations carried out under items (5) and (6) be notified to the third parties to whom the personal data has been transferred,
8. object to a result against you arising from the analysis of the processed data exclusively by automated systems,
9. claim compensation for damage you suffer due to unlawful processing.

You may withdraw your consent at any time for processing based on explicit consent; withdrawal does not affect the lawfulness of earlier processing. You can update your information registered on the Site at any time from the customer panel. If you are in the EU/EEA or the UK, see section 12 for your rights under the GDPR and the UK GDPR.

11. How to Apply

You can submit your requests concerning your rights, clearly stating your identity and your request, through one of the channels below in accordance with the Communiqué on the Procedures and Principles for Applications to the Data Controller. You may use the KVKK Data Subject Application Form published on the Site for your application.

- By a petition bearing your wet signature, in person, through a notary public or by registered mail with return receipt, to the address above,
- By registered email (KEP) to altinsoft.bilisim@hs01.kep.tr,
- Signed with a secure electronic signature or mobile signature, to destek@altinsoft.com,
- From the email address registered in the ALTINSOFT system, to destek@altinsoft.com.

Your application is concluded free of charge as soon as possible according to its nature and within thirty (30) days at the latest; if the operation requires an additional cost, the fee in the tariff set by the Personal Data Protection Board may be charged. If your application is rejected, the answer is found insufficient or no answer is

given in time, you may file a complaint with the Personal Data Protection Board under Article 14 of the KVKK.

12. Information for Individuals in the EU/EEA and the UK

Because ALTINSOFT offers its Services to people in the European Union, the European Economic Area and the United Kingdom, the EU General Data Protection Regulation (“GDPR”) and the UK GDPR apply to the processing of their personal data in addition to the KVKK. This section gives the information those laws require; the rest of this Policy also applies.

Controller. The controller is AltınSoft Bilişim Teknolojileri Tic. Ltd. Şti., whose details appear at the top of this Policy. You can reach us for any data protection matter through the channels in section 14.

Legal bases.

Purpose	Legal basis (GDPR)
Creating your account, taking and performing orders, providing the Services, support, invoicing and payment	Art. 6(1)(b): performance of a contract and steps before entering into it
Keeping invoices and accounting records, traffic records and answering lawful requests of authorities	Art. 6(1)(c): legal obligation
Information security, preventing fraud and abuse, protecting against bot attacks, establishing and defending legal claims	Art. 6(1)(f): our legitimate interest in keeping our systems, our customers and our business secure and in enforcing our rights
Checking the identity document in identity verification	Art. 6(1)(b) and (f): providing the Services to the actual account holder and preventing fraud
Matching your face with the photo on your identity document (biometric data)	Art. 9(2)(a): your explicit consent
Analytics cookies (Google Analytics)	Art. 6(1)(a): your consent given through the cookie banner
Promotional messages	Art. 6(1)(a): your consent

Is providing your data required? The data needed to create an account, place an order and pay is necessary for the contract; without it we cannot provide the Services. For some accounts, identity verification is required before a paid order is set up; if you do not complete it, the order waits and is not set up. Consent-based processing is always optional.

Automated decisions. The identity verification result is produced by our provider Veriff. A declined or unsuccessful verification does not end your contract: you can start a new verification at any time, and you may contact us to express your point of view, contest the result and ask a member of our staff to look at your case. We do not use profiling that produces legal or similarly significant effects on you.

International transfers. ALTINSOFT is established in Türkiye, which is not covered by an adequacy decision of the European Commission. When you give us your data directly, it is collected by us in Türkiye. Where we pass personal data of EU/EEA or UK individuals to recipients in third countries, we rely on an adequacy decision (including the EU–US Data Privacy Framework for certified US recipients) or on the Standard Contractual Clauses adopted by the European Commission (and the UK addendum). Our identity verification provider Veriff is established in the EEA. You can ask us for information about the safeguards used through the channels in section 14.

Retention. We keep personal data for the periods set out in section 6.

Your rights. Under the GDPR and the UK GDPR you have the right to access your personal data, to have it rectified, to have it erased, to restrict its processing, to receive the data you provided to us in a structured, commonly used and machine-readable format and have it transmitted to another controller (data portability), to object to processing based on our legitimate interests, and to withdraw your consent at any time without affecting earlier processing. You also have the right to lodge a complaint with the data protection supervisory authority of the EU/EEA country where you live or work or where the alleged infringement took place; in the UK, with the Information Commissioner's Office (ICO).

How to exercise them. Send your request through any channel in section 11; the KVKK Data Subject Application Form may also be used for GDPR requests and may be completed in English. We answer within one month; where necessary, given the complexity and number of requests, this period may be extended by two further months, in which case we tell you within the first month. Data portability requests are fulfilled on request, as there is no self-service export in the customer panel.

Data you host on your servers. Where you, as a business, host personal data on servers you buy from us, ALTINSOFT acts as your processor under the terms of our Data Processing Agreement, published on the Site.

13. Other Matters

Third-party sites. The Site may contain links to other websites. ALTINSOFT is not responsible for the privacy practices or content of those sites; we recommend that you review their own privacy policies.

Age limit. The services are offered to persons who are at least eighteen (18) years old and have the legal capacity to enter into contracts.

Changes. ALTINSOFT may update this Policy in line with changes in legislation and in its services. The current text is published on the Site with its "Last revised" date; material changes are also notified to your registered email address. Changes in legislation apply from their effective date even if this Policy has not yet been updated.

Governing law. This Policy is governed by the laws of the Republic of Türkiye. The jurisdiction provisions of the Terms of Service apply to disputes; consumers' rights to apply to consumer arbitration committees and consumer courts, and the right to file a complaint with the Personal Data Protection Board, are reserved.

14. Contact Information

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