

PRIVACY NOTICE

Data Controller	Trugo Akıllı Şarj Çözümleri Sanayi ve Ticaret A.Ş. ("Trugo")
Address	Muallimköy Mah. Deniz Cad. No:143/5 İç Kapı No:93 Gebze/Kocaeli-Türkiye

Introduction

As Trugo we highly value the processing and protection of your personal data. This Privacy Notice is prepared in order to ensure that our online visitors are informed about the personal data processing and transfer during the provision and development of various services within the Trugo website, in accordance with Article 10 of the Personal Data Protection Law No. 6698 ("Law" or "PDPL") and the Communiqué on Principles and Procedures to be Followed in Fulfilment of the Obligation to Inform.

In addition, you can find detailed information on your processed personal data, which is obtained automatically through cookies used on the website of Trugo, the types of cookies in use, and your management preferences regarding cookies in the **Cookie Policy**.

A. Support Center

Your personal data regarding **identity information** (name, surname), **contact information** (e-mail address, phone number), **customer transactions** (request, suggestion and complaint information, message content), and **visual & audio record information** (call center voice recordings) will be collected via electronic forms, e-mails, and call center conversations within the scope of Trugo's support center and solution services. Your personal data will be processed limitedly for the purposes of conducting communication activities, following up on requests/complaints, conducting necessary research/investigations for the fulfillment of support services on the subject of the request, providing information and support services, conducting customer relationship management processes, receiving recommendations for improvement of business processes and evaluating, conducting customer satisfaction activities, and using them as evidence of future disputes, according to the *"Processing of data is obligatory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject"* and *"Data processing is obligatory for the establishment, exercise or protection of any right"* legal basis regulated in Article 5 (2) of the PDPL.

Your personal data may be transferred to our suppliers residing in Turkey by taking the necessary technical and administrative measures within the scope of the above-mentioned purposes in accordance with Article 8 of the PDPL. In addition, if necessary, your personal data may be transferred to authorized public institutions under legal regulations in order to fulfill our legal obligations.

B. Business Partnership Application

Your personal data regarding **identity information** (name, surname), **contact information** (e-mail address, phone number) **customer transactions** (information about the station and device, message content) will be collected via electronic forms located on the business partnership application screen. Your personal data will be processed limitedly for the purposes of conducting business partnership application processes, conducting communication activities, following up on requests/complaints, providing information and support services, receiving recommendations for improvement of business processes and evaluating, conducting/auditing business activities, according to the *"Processing of data is obligatory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject"* legal basis regulated in Article 5 (2) of the PDPL.

Your personal data may be transferred to our suppliers residing in Turkey by taking the necessary technical and administrative measures within the scope of the above-mentioned purposes in accordance with Article 8 of the PDPL. In addition, if necessary, your personal data may be transferred to authorized public institutions under legal regulations in order to fulfill our legal obligations.

C. Website Support, Development and Information Security

Your personal data regarding **transaction security information** (IP address information, website access information, screen records, IMEI number, MAC address) will be collected via information security systems and electronic devices within the scope of carrying out support and development activities and information security processes within the services provided on the Trugo website. Your collected personal data will be processed limitedly for the purposes of conducting information security processes, conducting audits and ethical activities, conducting storage and archive activities, securing data controller operations, providing information to authorized institutions, and conducting activities in compliance with legislation, according to the *"It is obligatory for compliance with a legal obligation to which the data controller is subject"*, and *"Processing of data is obligatory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject"* legal basis regulated in Article 5 (2) of the PDPL.

Your personal data may be transferred to our suppliers residing in Turkey by taking the necessary technical and administrative measures within the scope of the above-mentioned purposes in accordance with Article 8 of the PDPL. In addition, if necessary, your personal data may be transferred to authorized public institutions under legal regulations in order to fulfill our legal obligations.

Ç. Legal Processes

In the event of legal processes and/or request by Energy Market Regulatory Authority and other authorized institutions, your personal data, which is collected during the provision of various services on the Trugo website, will be processed limitedly for the purposes of conducting activities in compliance with legislation, following up and conducting legal transactions, and informing authorized institutions, according to the *"It is obligatory for compliance with a legal obligation to which the data controller is subject"* and *"Data processing is obligatory for the establishment, exercise or protection of any right"* legal basis regulated in Article 5 (2) of the PDPL. Your personal data may be transferred to authorized public institutions under legal regulations in order to fulfill our legal obligations.

Your Rights and Application Methods of Your Personal Data

You have the rights to request regulated in Article 11 of the PDPL:

- to learn whether your personal data are processed or not,
- to demand for information as to if your personal data have been processed,
- to learn the purpose of the processing of your personal data and whether these personal data are used in compliance with the purpose,
- to know the third parties to whom your personal data are transferred in country or abroad,
- to request the rectification of the incomplete or inaccurate data, if any,
- to request the erasure or destruction of your data under the conditions referred to in PDPL,
- to request reporting of the operations carried out to third parties to whom your personal data have been transferred,
- to object to the occurrence of a result against yourself by analyzing the data processed solely through automated systems,
- to claim compensation for the damage arising from the unlawful processing of your personal data.

Regarding your processed personal data, you can send your requests and applications; to kvkk@trugo.com.tr by your registered e-mail address in our systems; to toggakillivehizli@hs01.kep.tr registered e-mail address (REM) by your registered e-mail address (REM) and secure e-signature or mobile signature; or you can send your application in written to Muallimköy Mah. Deniz Cad. No:143/5



İç Kapı No:93 Gebze/Kocaeli address. Also, you can decide on other methods to send requests and applications provided from Communique On The Principles And Procedures For The Request To Data Controller.

Your request for your rights regulated under Article 11 of the PDPL will be concluded as soon as possible regarding the nature of the request and thirty days at the latest, free of charge. However, if the transaction also requires an additional cost, you may be charged based on the tariff determined by the Personal Data Protection Board.