

## Privacy Policy

### 1. Introduction

We are RUNIBEX TECHNOLOGY GROUP (“RTG”). We are committed to protecting and respecting the privacy of the website visitors and users, customers (employees of the customers) of the service that RTG provides.

This policy sets out the basis on which any personal data we collect will be processed by us. Please read this privacy policy carefully to understand our views and practices and your rights regarding your personal data. By visiting <https://www.runibex.com> (our site) your personal information will be processed as described in this policy.

This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.

We use cookies on our website. As far as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.

Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can edit the initially given consent by clearing the browser cache, thus invoking the consent banner for editing the settings.

For the purpose of data protection legislation, the data controller member of RTG is;

	<b>REDİBEX BİLGİ TEKNOLOJİLERİ A.Ş.</b>	<b>NGİ BİLGİ TEKNOLOJİLERİ A.Ş.</b>	<b>RUNİBEX YAZILIM TEKNOLOJİ LTD. ŞTİ.</b>	<b>RUNIBEX TECHNOLOGY LTD (Data Controller Representative in Turkey:Redibex Bilgi Teknolojileri A.Ş.)</b>
Mersis no (CRS)	734184136400001	631067897800016	735092557600021	UK:10475228 (TR: 734184136400001)
registered e-mail	<a href="mailto:redibex.bilgi@hs01.kep.tr">redibex.bilgi@hs01.kep.tr</a>	<a href="mailto:ngi.bilgi@hs01.kep.tr">ngi.bilgi@hs01.kep.tr</a>		
e-mail	<a href="mailto:info@runibex.com">info@runibex.com</a>	<a href="mailto:info@runibex.com">info@runibex.com</a>	<a href="mailto:info@runibex.com">info@runibex.com</a>	<a href="mailto:info@runibex.com">info@runibex.com</a>
Internet site	<a href="http://www.runibex.com/">www.runibex.com/</a>	<a href="http://www.runibex.com/">www.runibex.com/</a>	<a href="http://www.runibex.com/">www.runibex.com/</a>	<a href="http://www.runibex.com/">www.runibex.com/</a>
Address	Atatürk Mahallesi Ataşehir Bulvarı Ata2/ATSH Sit. B2 Blok No:6/61-62, Ataşehir İstanbul			389c High Road, London, United Kingdom, N22 8JA

In this policy, "we", "us" and "our" refer to RTG.

## 2. How we use your personal data

2.1. In this Section we have set out the general categories of personal data that we may process, the purposes for which we may process personal data, and the legal bases of the processing.

Data type	May include	Source of data	Purpose	Legal Basis
usage data (data of the RTG website visitors and users of the Service that RTG provides)	your IP address, browser type and version, referral source, length of visit, page views and website navigation paths	Google Analytics/ our analytics tracking system	contractual, legal obligation, vital interests, public task, legitimate interest purposes	consent OR our legitimate interests, namely monitoring and improving our website and services OR other legal bases listed in this chapter
Contact data	Your name, e-mail address, company, telephone number	You/your employer	enabling us to get in touch with you	our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract OR other legal bases listed in chapter 3.2
enquiry data	information contained in any enquiry you submit to us regarding services	You	offering, marketing, and selling relevant services to you	consent OR other legal bases listed in chapter 3.2
notification data	information that you provide to us for subscribing to our email notifications and/or newsletters	You	sending you the relevant notifications and/or newsletters	Consent
correspondence data (Our website will generate the metadata)	communication content and metadata	You	communicating with you and record-keeping	our legitimate interests, namely the proper

associated with communications made using the website contact forms)	associated with the communication			administration of our website and business and communications with users
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Please do not supply any other person's personal data to us, unless we prompt you to do so.

### 3. Providing your personal data to others

We may disclose your personal data to following parties, as far as reasonably necessary for the purposes and on the legal bases, set out in this policy.

Information type	Receiving parties	Purposes	Legal bases
Personal data	any member of our group of companies (this means our subsidiaries, affiliates, our parent company)	as far as reasonably necessary for the purposes and on the legal bases, set out in this policy	
Other personal data	Authorities, governmental bodies, courts, arbitrators, associations, organisations, etc.	for compliance with a legal obligation to which we are subject, or to protect your vital interests or the vital interests of another natural person; establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure	

### 4. International transfers of your personal data

In this Section, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA) under UK Data Protection Act, or EU Data Protection law (in accordance with the Article 49 of the GDPR), or UK and/or EU Data Protection law, or Turkish Data Protection Law no. 6698 (“KVKK”) .

A) We have offices and subsidiaries or business partners/subcontractors in Turkey and United Kingdom. We may transfer your personal data from the EEA to the UK and/or Turkey and process that data in the UK or Turkey for the purposes set out in this policy, and may permit our subsidiaries, our suppliers and subcontractors to do so,

B) we may transfer your personal data from the UK to the EEA and/or Turkey and process that personal data in the EEA and/or Turkey for the purposes set out in this policy, and may permit our subsidiaries, our suppliers and subcontractors to do so,

C) we may transfer your personal data from Turkey to the UK and/or EEA and process that personal data in the UK and/or EEA for the purposes set out in this policy, and may permit our suppliers and subcontractors to do so.

We may also disclose your contact data, account data or any other personal data mentioned in this policy to our offices, subsidiaries or business partners ;

- where such disclosure/transfer is necessary for the performance of a contract/ conclusion or performance of a contract concluded in the interest of you, the transfer is necessary for important reasons of public interest/ the transfer is necessary for the establishment, exercise, or defence of legal claims/ where you explicitly consented to the transfer.
- which have signed data processing and confidentiality agreements with us,
- where personal data is protected under the Turkish Data Protection Law, no 6698 in Turkey.
- Where personal data is protected under the UK GDPR and UK Data Protection Act, no 6698 in UK,

If none of the specific situations referred to above is applicable, a transfer to a third country may take place only if the transfer is not repetitive, concerns only a limited number of data subjects, is necessary for the purposes of compelling legitimate interests pursued by the controller which are not overridden by the interests or rights and freedoms of the data subject, and the controller has assessed all the circumstances surrounding the data transfer and has on the basis of that assessment provided suitable safeguards with regard to the protection of personal data.

B) The hosting facility for our websites, our servers which your data may be kept and some of our Services maybe situated in United Kingdom/EEA/the United States Some cloud-based services that are used in our Services are situated in countries outside the European Union, including The United States and United Kingdom (after Brexit).

The European Commission has made an "adequacy decision" with respect to the data protection laws of United Kingdom/the United States. Transfers to United Kingdom/the United States will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which can be obtained from [https://edps.europa.eu/data-protection/data-protection/reference-library/international-transfers\\_en](https://edps.europa.eu/data-protection/data-protection/reference-library/international-transfers_en).

## 5. Retaining and deleting personal data

5.1. This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3. We will retain your personal data as follows:

<b>Data</b>	<b>Retention period</b>
<b>Core Information</b> ( Name / Address / Contact Information – Individuals and their contact details, Listing of all Services (Live and Historic), Records of orders, and any other records which relate to a customer)	Retained for the life of an account and for 5 years after an accounts closure.
<b>Customer Notes</b> (Notes / Tasks (including attachments), Incidents (including attachments), Sales & Marketing Activity)	Retained for 2 years following date of usage

<b>Customer Services Usage</b> (Usage of our services)	Retained for 5 years following date of usage
<b>Internal Email and files</b>	Retained for life of business

5.4. Notwithstanding the other provisions of this Section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

5.5. Deleting information which is no longer required is of benefit to our Company and is also required by legislation. One of the principles of the GDPR or KVKK is data minimisation– only collecting and processing the personal data necessary for the purpose for that collection and processing. Personal data should only be kept for as long as is necessary for the purpose for which it was collected. Minimising the amount of information we retain reduces the amount of information which can be lost in a cyberattack. Individuals also have the right to access the personal data we hold about them. The more personal data we store unnecessarily, the more burdensome it is to respond to these requests.

5.6. Deletion and destruction of data will comply with the Data Protection and Privacy Policy.

## 6. Amendments

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this policy.

We may notify you of changes to this policy by email or through a notification on our website or service.

## 7. Your rights

In this Section, we have summarized the rights that you have under data protection law. Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under data protection law are:

- the right to access
- the right to rectification
- the right to erasure;
- the right to restrict processing;
- the right to object to processing
- the right to data portability;
- the right to complain to a supervisory authority; and
- the right to withdraw consent.

You have the right to confirmation as to whether we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information

includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can request your data by email: [info@runibex.com](mailto:info@runibex.com).

You have the right to have any inaccurate personal data about you rectified and, considering the purposes of the processing, to have any incomplete personal data about you completed.

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise, or defense of legal claims.

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful, but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise, or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise, or defense of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

To the extent that the legal basis for our processing of your personal data is: consent; or that the processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used, and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise any of your rights in relation to your personal data by written notice to us: [info@runibex.com](mailto:info@runibex.com)

## **8. Our details**

This website and services linking to this privacy policy are owned and operated by RTG. You can find our registration details in Paragraph 1 of this Policy. You can contact us:

by post, to the postal address given in this Policy;

using our website contact form;

by telephone, on the contact number published on our website from 09.00-16.00 EET; or

by email, using the email addresses published on our website.

## **10. Data Protection Representative (for Turkey)**

Redibex Bilgi Teknolojileri A.Ş.

e-mail: [info@runibex.com](mailto:info@runibex.com)