

# Online Personal Data Protection Notice

## **BELIMO Turkey Otomasyon A.Ş.**

This Online Personal Data Protection Notice explains scope, purpose, methods of processing your personal data we collect from you when you visit the website of **BELIMO Turkey Otomasyon A.Ş., Şerifali Mah. Beyit Sk. No:52/1, 34775 Ümraniye / Istanbul (“Belimo”)**, the data controller, and tools we use during within the process.

We take protection of your personal data rather seriously and we are committed to conditions set forth at applicable data protection regulations for processing such data, in particular the Law on the Protection of Personal Data no. 6698 (the “Law”) and applicable legislation.

You may access the Personal Data Protection Notice in order to see information regarding other data processing processes carried out by Belimo at the [General Data Protection Statement](#).

## **1. Processing of personal data.**

When you visit our website, we collect and process the following personal data with regard to you.

### **1.1. Signing in the website for queries**

You have to sign up to the website in order to receive the following services:

- Storage of a project list (for instance shopping basket)
- Asking for price with shopping basket saved
- Orders
- Downloading price catalogue
- Downloading software, Update Service also included

As a general rule, we collect the following data for sign up:

- Full Name
- Address details
- Phone number and valid e-mail address
- User name and password
- Company name

Data we collect at sign up sheet are stored for the purposes of answering both relevant queries and queries that may be asked in the future, carrying out your membership transactions, being capable of shopping from the website, asking prices with shopping basket saved.

When you carry out membership transactions via the website, legal ground for personal data we collect with regard to you is express consent as per paragraph 1 of Article 5 of the Law. In the event your personal data are processed so that you can shop from the website, legal ground is processing of personal data of contracting parties required provided that it is directly related to conclusion or execution of contract pursuant to sub-clause c of paragraph 2 of article 5 of the Law.

In case EU General Data Protection Regulation (GDPR) applies, legal ground regarding processing of personal data after giving consent is as set forth at article 6(1)(a) of GDPR or Article 13(1) of FADP. In case EU General Data Protection Regulation (GDPR) applies, if Personal Data are processed for the purpose of performance of a contract made with an affected person, measures taken before contract are also included, legal ground of such process is as set forth at article 6(1)(b) of GDPR or Article 13(2)(a) of FADP.

#### **Method of Collecting Personal Data:**

Your personal data are collected electronically. As detailed below, your personal data are collected also through cookies.

## **2. Use of cookies.**

We use cookies in order to render our website more user friendly and to enable certain functions like shopping basket to work. Cookies are small text files saved to your computer or mobile device. When a cookie is activated, your browser may be identified from such cookie and information located in such cookie may be used. In this process, no personal data that may identify any particular person will be stored.

Types of cookies we use at our website:

- **Session Cookies:** The purpose of these cookies which are automatically deleted after logging off browser session is for example saving default language settings or shopping basket. Thus, you can use such functions at several pages during your web session.
- **Temporary or persistent cookies:** These cookies remain saved at your computer or mobile device after logging of browser until you delete them or are disabled after you log off your session (Login cookies). In case of saving cookies, your browser will be scanned when you re-visit the site in question and settings saved will be activated.
- **Performance Cookies:** These cookies from third parties for web analysis are used to improve our website and contents of our website (see Google Analytics).

Thanks to optional settings offered by commonly used browsers, you may decline all or certain cookies or you may delete cookies from your computer using relevant function of browser.

In the event you make such arrangements at your settings, some of functions at our website may not be used with all their functions.

Pursuant to the law, legal ground regarding utilization of cookies needed technically is legitimate interests of the company provided that your basic rights and freedoms are not harmed pursuant to sub-clause f of paragraph 2 of the article 5 of the Law. While legal ground for using cookies for analysis purposes is express consent pursuant to paragraph 1 of article 5 of the Law.

### 3. Use of Google Analytics.

We use “Google Analytics” service offered by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) at our website for the purpose of making evaluation regarding your use of the site. Information collected by cookies is sent to and stored at a Google server generally located in the USA. IP addresses of users locate in European Union and European Economic Area member states are abbreviated.

Abbreviation of addresses in this way prevents personal references towards your IP address. Under Data Contract we made with Google Inc., Google evaluates use and activities of the website by using information collected and provides services related to internet usage. IP address forwarded by your browser in the context of Google Analytics will not be merged with other Google data.

In order to obtain further information related to the use of data by Google Inc.:

<https://support.google.com/analytics/answer/6004245?hl=de>

In order to prevent data (your IP address included) related to your website usage created by cookie from being sent to and processed by Google, download and install, [Google Analytics Opt-out Browser Add on](#).

Legal ground regarding utilization of Google Analytics is legitimate interests of the company provided that your basic rights and freedoms are not harmed pursuant to sub-clause f of paragraph 2 of the article 5 of the Law. In case EU General Data Protection Regulation (GDPR) applies, legal ground regarding utilization of Google Analytics is as set forth at article 6(1)(f) of GDPR or Article 13(1) (2) of FADP.

### 4. Content Delivery Network (CDN) from Akamai.

Akamai is a Content Delivery and Cloud Infrastructure service provider that delivers, accelerates and protects online applications. Akamai services used worldwide are controlled by Akamai Technologies, Inc., Cambridge, MA, USA.

We use Akamai services for the purpose of accelerating our website so that it can offer a reasonable response time all over the world.

Akamai sends personal data obtained from log files like IP address to USA anytime such data are processed. The reason for this is certain servers for processing log files are located only in USA. Akamai received certificate under Confidentiality Protection Program in EU in order to configure transfer of personal data to USA in accordance with data protection policies. Further, Belimo and Akamai agreed EU standard contract articles. Individual Akamai companies also made such contracts among themselves.

Legal ground regarding utilization of Akamai and processing of personal data in relation to Akamai is legitimate interests of the company provided that your basic rights and freedoms are not harmed pursuant to sub-clause f of paragraph 2 of the article 5 of the Law. In case EU General Data Protection Regulation (GDPR) applies, legal ground regarding utilization of Akamai and processing of personal data in relation to Akamai is as explained at article 6(1)(f) of GDPR or Article 13(1) (2) of FADP.

### 5. Use of social media add-ons.

We do not use any social media add-on at our website; we only use links to relevant pages and/or contents.

## 6. Server log files.

Whenever our website is called, our system automatically collects data and information from system of computer where call is made and stores them at log files. Such log files provide information such as IP address, browser used, website visited, time of access and quantity of data transfer. We do not use such data to identify individual users or to make any evaluation for marketing purposes. Information will be processed by providing security of our information technology systems and deleted six months later.

Legal ground regarding temporarily saving server log files is legitimate interests of the company provided that your basic rights and freedoms are not harmed pursuant to sub-clause f of paragraph 2 of the article 5 of the Law. In case EU General Data Protection Regulation (GDPR) applies, legal ground regarding temporarily saving server log files is as set forth at article 6(1)(f) of GDPR or Article 13(1) (2) of FADP.

## 7. Rights of data subjects.

You can exercise your following rights which are listed at Article 11 of the Law by applying to the Company in writing or with other methods specified at the Communiqué on the Procedures and Principles of Application to Data Controller;

- a) learning whether personal data are processed,
- b) if personal data are processed, requesting information regarding this,
- c) learning purpose of processing of personal data and whether these are used as intended,
- ç) knowing third parties to whom personal data are transferred at home or abroad,
- d) if personal data are processed incomplete or wrong, asking correction of the same,
- e) asking deletion or destruction of personal data under terms envisaged at article 7 of the Law,
- f) asking that transactions performed pursuant to sub-clauses (d) and (e) are notified to third parties to whom personal data are transferred,
- g) objection to emergence of a result against the person himself through analysis of data processed by means of automated systems exclusively,
- ğ) requesting indemnification of loss in the event of incurring loss due to processing of personal data unlawfully

In addition to your foregoing rights, you are entitled to benefit from data portability if deemed appropriate. Such rights will be valid unless there is any legal obligation for data storage or other reasonable interests that may prevent Belimo's applications. Further, you can file a complaint to Turkish Data Protection Authority under the terms at the Law, if applicable.

You are entitled to revoke consent you gave previously for processing of your data any time you wish.

You can send information to contact address pursuant to Section 1.9. for exercising your rights.

## 8. Technical and corporate measures.

We take technical and corporate measures for the sake of protecting your personal data. Such measures are constantly improved in accordance with current technical advances.

Any information you transfer to our website (for instance in the event of query or login) are encrypted for transfer between your browser and our system by using SSL (Secure Sockets Layer). You can recognize encrypted connections from the prefix “https://” at address bar of your browser.

## 9. Contact details.

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