

KVKK · KRB-KVK-AM-03



Privacy Notice for Website Visitors

Information on the Processing of Personal Data · Art. 10 of KVKK No. 6698



DOCUMENT NAME Website Privacy Notice	DOCUMENT NO KRB-KVK-AM-03	PUBLICATION DATE 26.09.2026
VERSION 2.0	SCOPE karub.com (all language versions)	DATA CONTROLLER Karub Enerji San. ve Tic. A.Ş.

Translation notice: This document is a translation of the Turkish original. In case of any discrepancy between this translation and the Turkish text, the Turkish text shall prevail.

As Karub Enerji Sanayi ve Ticaret A.Ş. (the “**Company**” or “**Karub**”), we process the personal data of natural persons (the “**data subject**” or “**you**”) who visit our website at <https://karub.com>, including all of its language versions (the “**Website**”), and who contact us through our corporate communication channels, in accordance with the Personal Data Protection Law No. 6698 (the “**Law**”) and the relevant secondary legislation.

This Privacy Notice (the “**Notice**”) has been prepared in our capacity as data controller for the purpose of informing you, pursuant to Article 10 of the Law and the Communiqué on the Procedures and Principles to Be Followed in Fulfilling the Obligation to Inform.

The Notice is solely **informative** in nature; no approval, acceptance or consent statement is requested from you. With respect to data processing activities based on explicit consent (non-essential cookies), your consent is obtained on a per-category basis through the **Cookie Preference Panel** on the Website, **independently of this Notice and through a separate action**, in line with Principle Decision No. 2026/347 of the Personal Data Protection Board dated 18.02.2026.

Data processing activities relating to our job applicants, our employees, and the employees or authorized representatives of our suppliers and business partners fall outside the scope of this Notice; such persons are informed separately at the beginning of the relevant process.

1 Data Controller

TRADE NAME	Karub Enerji Sanayi ve Ticaret A.Ş.
ADDRESS	Kılıçali Paşa Mahallesi, Meclis-i Mebusan Caddesi, No: 8/5, İç Kapı No: 201 (Galataport J4 Blok), Beyoğlu / İstanbul
TELEPHONE	444 55 72

E-MAIL	kvkk@karub.com
KEP ADDRESS (REGISTERED E-MAIL)	karubenerji@hs01.kep.tr
MERSİS NO	0526152886300001
WEBSITE	https://karub.com

Although our Company has offices in London (United Kingdom) and Dubai (United Arab Emirates), the data controller with respect to the Website and the data processing activities covered by this Notice is Karub Enerji Sanayi ve Ticaret A.Ş., established in Türkiye.

2 Personal Data Processed, Purposes of Processing and Legal Grounds

Your personal data are processed in accordance with the principles set out in Article 4 of the Law, namely lawfulness and fairness; accuracy and, where necessary, being kept up to date; processing for specified, explicit and legitimate purposes; being relevant, limited and proportionate to the purposes for which they are processed; and being retained only for the period necessary. The table below shows **separately** for each data category the purpose for which it is processed and the legal ground under Article 5 of the Law on which the processing is based.

DATA CATEGORY	PERSONAL DATA PROCESSED	PURPOSES OF PROCESSING	LEGAL GROUND
Transaction Security	IP address, date and time of access, server and security log records, session ID, error logs	Ensuring the secure and uninterrupted operation of the Website; conducting information security processes; detecting and preventing cyberattacks, bot traffic and misuse	Art. 5/2-(f) The legitimate interest of our Company, provided that it does not harm your fundamental rights and freedoms (security of the Website and IT infrastructure)
Essential Cookie and Preference Data	Session cookie, security verification (CSRF) cookie, selected language version, cookie preference and consent record (date, time, notice version, selected preferences)	Providing the basic functions of the Website; remembering your language preference; applying and recording your cookie preferences	Art. 5/2-(f) The legitimate interest of our Company (technical operation of the Website) Art. 5/2-(e) With respect to consent records: establishment, exercise or protection of a right (proof of the existence of consent)

DATA CATEGORY	PERSONAL DATA PROCESSED	PURPOSES OF PROCESSING	LEGAL GROUND
Data Obtained through Analytics, Functional and Marketing Cookies	Cookie and device identifiers; device, browser and operating system information; pages visited, time spent on page, click and navigation activity; referring source; approximate location based on IP address (at country/city level)	Measuring visit statistics and improving the Website; remembering your interface preferences; measuring corporate promotional activities and campaign effectiveness	Art. 5/1 · Explicit consent Consent is given on a per-category basis through the Cookie Preference Panel, separately and of your own free will, and may be withdrawn at any time. Not giving consent does not prevent you from using the basic functions of the Website.
Contact Requests	Identity (name, surname), contact (e-mail address, telephone number), professional information (the organization you work for, your title), content of the request and correspondence records	Receiving, evaluating, responding to and following up on your requests for information, quotations, supply and cooperation	Art. 5/2-(c) With respect to requests aimed at the establishment of a contract, such as a quotation, supply or cooperation: processing being directly related to the establishment or performance of a contract Art. 5/2-(f) With respect to general information requests: the legitimate interest of our Company (responding to your request)
Legal Proceedings and Official Requests	Data included in the categories above (limited solely to the relevant request or dispute)	Responding to requests for information and documents from judicial authorities and competent public institutions and organizations; following up on legal proceedings; protecting the rights of our Company in potential disputes	Art. 5/2-(ç) Processing being necessary for the data controller to fulfil its legal obligation Art. 5/2-(e) Processing being necessary for the establishment, exercise or protection of a right



Special categories of personal data: No special categories of personal data listed in Article 6 of the Law are processed through the Website. We kindly ask that you do not share data concerning your health, religion, ethnic origin, criminal convictions or similar matters in the messages you send through our communication channels. Should any such data unrelated to your request be transmitted to us, they will be destroyed without being subjected to any processing.



Automated decision-making: Your personal data are not used for the purpose of making a decision about you based solely on automated systems which produces legal effects concerning you or similarly significantly affects you.



Children: The Website does not offer services directed at persons under the age of 18, and personal data belonging to such persons are not knowingly collected.

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Method of Collecting Personal Data

Your personal data are collected electronically, on the basis of the legal grounds set out above, through the following methods:

- ◆ **By automated means:** through server records and essential cookies during your visit to the Website; and through non-essential cookies and similar technologies only if you give consent to the relevant category via the Cookie Preference Panel.
- ◆ **By partially automated means:** by being transmitted by you personally through our corporate communication channels, such as the e-mail address info@karub.com, the telephone line 444 55 72 and our Company's LinkedIn page.

Detailed information on the names, providers and retention periods of the cookies used, and on how you can manage your preferences, is available in our **Cookie Policy** (<https://karub.com/tr/cookie-policy>). If you contact us through third-party platforms such as LinkedIn, the relevant platform also acts as a data controller with respect to its own data processing activities.

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Transfer of Personal Data

4.1. Domestic Transfers

Your personal data may be transferred to recipients in Türkiye pursuant to Article 8 of the Law, solely for the purposes set out below and to the extent required by such purposes:

RECIPIENT GROUP	PURPOSE OF TRANSFER	LEGAL GROUND
Suppliers from which we receive information technology, hosting and Website development and maintenance services (in their capacity as data processors)	Hosting, technical maintenance and security of the Website	Law Art. 8/1 and Art. 5/2-(f)
Consultants from which we receive legal, financial advisory and independent audit services	Conducting legal proceedings, audit activities and protecting the rights of our Company	Law Art. 8/1 together with Art. 5/2-(ç) and (e)
Courts, chief public prosecutor's offices, enforcement offices, the Personal Data Protection Authority and other public institutions and organizations legally authorized to request information and documents	Responding to the legal requests of competent authorities and fulfilling the legal obligations of our Company	Law Art. 8/1 together with Art. 5/2-(ç)

4.2. Transfers Abroad

The servers of certain services used on the Website are located abroad. Accordingly, your personal data are transferred abroad within the framework of Article 9 of the Law and the Regulation on the Procedures and Principles Regarding the Transfer of Personal Data Abroad, to the recipients and on the basis of the safeguards shown below:

RECIPIENT	COUNTRY	DATA TRANSFERRED AND PURPOSE
Google Ireland Limited / Google LLC (Google Analytics)	Ireland / USA	Data obtained through analytics cookies; measuring visit statistics. Takes place only if you give consent to analytics cookies.
LinkedIn Ireland Unlimited Company / LinkedIn Corporation	Ireland / USA	Data obtained through marketing and social media cookies; measuring campaign effectiveness. Takes place only if you give consent to the relevant cookie category.
Microsoft Ireland Operations Limited	Ireland / USA	Contact request and transaction security data; operation of corporate e-mail and Website infrastructure
London and Dubai offices affiliated with the Karub group	United Kingdom / United Arab Emirates	Contact requests; evaluating and responding to your request where it falls within the field of activity of the relevant office

In exceptional cases where the above safeguards are not in place and the transfer is incidental in nature, the transfer shall be carried out only if one of the conditions listed in the sixth paragraph of Article 9 of the Law exists (for example, where the transfer is necessary for the establishment or performance of a contract requested by you). With respect to third-party cookies, Google and LinkedIn may also act as data controllers within the framework of the purposes and means determined by them; details of the data processing activities of these companies are set out in their own privacy policies.

5 ⌚ Retention Periods

Your personal data are retained for the period necessary for the purpose for which they are processed and for the period stipulated in the relevant legislation. Upon expiry of these periods or where the reasons requiring processing cease to exist, your personal data are erased, destroyed or anonymized ex officio, within periodic destruction intervals not exceeding six months, in accordance with the Regulation on the Erasure, Destruction or Anonymization of Personal Data and our Company's Personal Data Retention and Destruction Policy.

DATA CATEGORY	RETENTION PERIOD
Transaction security and log records	2 (two) years
Cookies	The periods specified for each cookie in the Cookie Policy
Cookie preference and consent records	For as long as the consent remains valid and for 3 (three) years from the withdrawal or expiry of the consent

DATA CATEGORY	RETENTION PERIOD
Contact requests and correspondence	2 (two) years from the conclusion of the request; where the request turns into a contractual relationship, 10 (ten) years from the end of the year in which the contractual relationship ends, pursuant to Article 82 of the Turkish Commercial Code No. 6102
Legal proceedings and official requests	The applicable statute of limitations period from the final conclusion of the dispute or request (generally 10 (ten) years)

6 Data Security

Pursuant to Article 12 of the Law, our Company takes the necessary technical and organizational measures to ensure an appropriate level of security in order to prevent the unlawful processing of your personal data and unlawful access to such data, and to ensure the safekeeping of your data. These measures include the following:

- Encrypted data transmission via SSL/TLS
- Authorization and access control, and keeping of access logs
- Firewall and intrusion detection systems
- Confidentiality undertakings obtained from employees
- Contracts concluded with data processors that include data security obligations

In the event that your processed personal data are obtained by others through unlawful means, this shall be notified to the Board as soon as possible and in any case within **72 hours**, and to you within the shortest reasonable time, pursuant to the fifth paragraph of Article 12 of the Law and Decision No. 2019/10 of the Personal Data Protection Board dated 24.01.2019.

7 Your Rights under Article 11 of the Law

Pursuant to Article 11 of the Law, by applying to our Company, you have the right to:

- a learn whether your personal data are processed,
- b request information in this regard if your personal data have been processed,
- c learn the purpose of processing of your personal data and whether they are used in accordance with their purpose,
- ç know the third parties in Türkiye or abroad to whom your personal data are transferred,
- d request the rectification of your personal data if they have been processed incompletely or inaccurately,
- e request the erasure or destruction of your personal data within the framework of the conditions set out in Article 7 of the Law,

f request that the operations carried out pursuant to subparagraphs (d) and (e) be notified to third parties to whom your personal data have been transferred,

g object to the occurrence of a result to your detriment by means of the analysis of your processed data exclusively through automated systems,

ğ request compensation for damages if you suffer damage due to the unlawful processing of your personal data.

With respect to data processing activities based on explicit consent, you may withdraw the consent you have given at any time through the Cookie Preference Panel, as easily as it was given. The withdrawal of consent does not affect the lawfulness of processing carried out before the date of withdrawal.

8 Method of Application

You may submit your requests concerning the rights listed above to our Company through one of the following methods, pursuant to the Communiqué on the Procedures and Principles of Application to the Data Controller:

- ◆ by a petition bearing a wet signature, delivered by hand or through a notary public, to our address set out in Section 1,
- ◆ via your registered electronic mail (KEP) address to our KEP address karubenerji@hs01.kep.tr,
- ◆ signed with a secure electronic signature or mobile signature, to kvkk@karub.com,
- ◆ from your e-mail address previously notified to our Company and registered in our system, to kvkk@karub.com.

 The **Data Subject Application Form**, prepared to facilitate your application, is available at <https://karub.com/tr/kvkk>; use of the form is not mandatory.

The application must be made in Turkish and must contain the following information:

a Name, surname and, if the application is in writing, signature,

b For citizens of the Republic of Türkiye, the T.R. identity number; for foreigners, nationality, passport number or, if any, identity number,

c Residential or business address for notification purposes,

ç If any, e-mail address, telephone and fax number for notification purposes,

d The subject of the request and, if any, related information and documents.

If the application is made by a third party on behalf of the data subject, a power of attorney containing special authority to make the application must be attached to the application. Our Company may request additional information in order to determine whether the applicant is the data subject and to clarify the matters in the application.

Your application shall be concluded free of charge as soon as possible, depending on the nature of the request, and within **thirty (30) days** at the latest. However, where the response is given in writing, no fee shall be charged for up to ten pages; for each page above ten pages, the processing fee determined in Article 7 of the Communiqué may be charged, and where the response is provided on a recording medium such as a CD or flash drive, a fee not exceeding the cost of the recording medium may be charged. If the application arises from an error of our Company, the fee charged shall be refunded. The exceptional cases listed in Article 28 of the Law are reserved.

If your application is rejected, if you find the response insufficient, or if no response is given within the prescribed period, you may lodge a complaint with the Personal Data Protection Board pursuant to Article 14 of the Law within **thirty (30) days** from the date on which you learn of the response and, in any case, within **sixty (60) days** from the date of application.

9 Visitors Accessing from the European Economic Area and the United Kingdom

In addition to the Law, the European Union General Data Protection Regulation (“**GDPR**”) and the United Kingdom General Data Protection Regulation and the Data Protection Act 2018 (together, “**UK GDPR**”) may also apply, to the extent applicable, to the processing of personal data of visitors accessing from the European Economic Area (“**EEA**”) or the United Kingdom, including through the English version of the Website. This Section supplements the sections above with respect to such visitors; the retention periods above (Section 5) and the statement on automated decision-making (Section 2) also apply to these visitors.

• 9.1. Legal Bases for Processing

DATA CATEGORY (SECTION 2)	LEGAL BASIS UNDER ART. 6(1) GDPR / UK GDPR
Transaction Security	Art. 6(1)(f) Legitimate interest (security of the Website and IT infrastructure)
Essential Cookie and Preference Data	Art. 6(1)(f) Legitimate interest (technical operation of the Website) Art. 6(1)(c) With respect to consent records: obligation to demonstrate the existence of consent (Art. 7(1))
Analytics, Functional and Marketing Cookies	Art. 6(1)(a) · Consent With respect to the placement and reading of cookies on your device, additionally, consent pursuant to the national legislation implementing Article 5(3) of the EU ePrivacy Directive (2002/58/EC) and Regulation 6 of the UK Privacy and Electronic Communications Regulations (PECR 2003)
Contact Requests	Art. 6(1)(b) Taking steps at your request prior to entering into a contract Art. 6(1)(f) With respect to general information requests: legitimate interest

DATA CATEGORY (SECTION 2)	LEGAL BASIS UNDER ART. 6(1) GDPR / UK GDPR
Legal Proceedings and Official Requests	Art. 6(1)(f) Legitimate interest in the establishment, exercise or defence of legal claims and in the fulfilment of obligations arising under Turkish law Art. 6(1)(c) With respect to obligations arising under EU or UK law

With respect to processing based on legitimate interest, you may request information on the balancing test carried out.

● 9.2. Your Rights

Under the GDPR and UK GDPR, you have the rights of access to, rectification and erasure of your personal data, restriction of processing and data portability, and you may object to processing based on legitimate interest. With respect to processing based on consent, you may withdraw your consent at any time through the Cookie Preference Panel. You may submit your applications **in Turkish or English** through the channels set out in Section 8; the formal requirements listed in Section 8 do not apply to such applications, and applications are, as a rule, responded to within **one (1) month**.

● 9.3. Right to Lodge a Complaint with a Supervisory Authority

Visitors in the United Kingdom may lodge a complaint with the Information Commissioner's Office (ICO, <https://ico.org.uk>), and visitors in the EEA may lodge a complaint with the data protection supervisory authority of the EEA member state of their habitual residence, place of work or place of the alleged infringement. This right does not affect your right to lodge a complaint with the Personal Data Protection Board pursuant to Article 14 of the Law.

● 9.4. International Transfers

The personal data of visitors accessing from the EEA and the United Kingdom are collected directly by our Company, which is established in Türkiye. Onward transfers carried out by our Company are described in Section 4.2. You may request information on the appropriate safeguards applied with respect to these transfers and a copy thereof through the channels set out in Section 8.

● 9.5. LinkedIn Page Insights

With respect to the page statistics (Page Insights) relating to our LinkedIn page, our Company and LinkedIn Ireland Unlimited Company act as joint controllers pursuant to Article 26 of the GDPR. Primary responsibility for the obligations in this context has been assumed by LinkedIn, and detailed information is available in LinkedIn's privacy policy.