**PROMENA WEBSITE**

**COOKIE PRIVACY NOTICE**

This Cookie Privacy Notice **(“Privacy Notice”)** has been prepared by Zer Merkezi Hizmetler ve Ticaret Anonim Şirketi **("Company")** in the capacity as a data controller within the scope of Article 10 of the Law on Protection of Personal Data, numbered 6698 **("Law")** and the Communiqué on the Principles and Procedures to Be Followed in Fulfilment of The Obligation to Inform.

Tracking technologies such as cookies, pixels, and gifs **("Cookies")** are small text files placed on your devices such as tablets, phones, or computers during your use of online applications such as websites or mobile applications. Cookies enable the servers of our website to recognize your devices and, for example, to remember your language preferences, saved usernames and passwords, or the products in your shopping cart, and to manage the traffic on the site. Cookies also help us to analyze the number and mass of visitors to our website so that we can improve our software to provide you with a better experience and, if you prefer, to personalize the advertisements you view during your internet use.

According to the Law, your personal data regarding the cookies used on [www.promena.net](http://www.promena.net) **("Website")** may be processed by the Company in the capacity as a data controller within the scope described below.

**Purposes and Legal Grounds for Processing Personal Data**

Your collected data will be processed for the purposes set out below **("Purposes")** within the personal data processing conditions and purposes specified in Article 5 of the Law. Cookies are used for different purposes on the Website. Depending on the type of relevant cookie used, the data processing purposes, and the data processing conditions under the Law that we rely on when using the relevant cookie may vary.

***Essential Cookies***

Essential cookies are cookies that are placed on your device during your viewing of the Website and are necessary for the proper functioning of the online services offered. For the data processing activities that we carry out during the use of these cookies, we rely on the legal grounds of “**processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract**” and “**processing of data is necessary 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**” within the scope of Article 5 of the Law.

***Performance and Analytics Cookies***

Performance cookies allow us to track and analyze the number of people viewing the Website and Website traffic. Thanks to these cookies, we can obtain information such as which areas of the Website are visited most frequently or infrequently and optimize the website's traffic. For the data processing activities that we carry out during the use of these cookies, we rely on the legal grounds of “**processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract**”, “**processing of data is necessary 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 “**explicit consent**” within the scope of Article 5 of the Law.

***Functionality Cookies***

Functionality cookies are cookies used for personalization and remembering preferences on the Website. These cookies are used to provide functionality other than essential cookies. For the data processing activities that we carry out during the use of these cookies, we rely on the legal grounds of “**processing of data is necessary 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 “**explicit consent**” within the scope of Article 5 of the Law.

***Personalized Advertising and Marketing Cookies***

Personalized advertising cookies are used to promote personalized products and services to you on the Website or in media other than the Website in accordance with your viewing history and visitor profile. For the data processing activities that we carry out during the use of these cookies, we rely on the legal ground of “**explicit consent**” within the scope of Article 5 of the Law.

Below you can find the different types of cookies we use on the Website. Both first-party cookies (placed by the Website you visit) and third-party cookies (placed by providers other than the Website you visit) are used on the Website.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Essential Cookies** | | | | | | | |
| **Cookie Name** | | **Provider** | | **Purpose of use** | | **Duration of Use** | |
| *\_hjAbsoluteSessionInProgress* | | *.promena.net* | | *The cookie is set so Hotjar can track the beginning of the user's journey for a total session count. It does not contain any identifiable information.* | | *30 minutes* | |
| *\_hjFirstSeen* | | *.promena.net* | | *The cookie is set so Hotjar can track the beginning of the user's journey for a total session count. It does not contain any identifiable information.* | | *30 minutes* | |
| *AnalyticsSyncHistory* | | *.linkedin.com* | | *Used to store information about the time a sync with the lms\_analytics cookie took place for users in the Designated Countries* | | *1 month* | |
| *ASP.NET\_SessionId* | | *solutions.promena.net* | | *General purpose platform session cookie, used by sites written with Miscrosoft .NET based technologies. Usually used to maintain an anonymised user session by the server.* | | *Session* | |
| *ASP.NET\_SessionId* | | *www.promena.net* | | *General purpose platform session cookie, used by sites written with Miscrosoft .NET based technologies. Usually used to maintain an anonymised user session by the server.* | | *Session* | |
| **Performance and Analytics Cookies** | | | | | | | |
| **Cookie Name** | **Provider** | | **Purpose of use** | | | **Duration of Use** | |
| *\_gid* | *.promena.net* | | *This cookie is set by Google Analytics. It stores and update a unique value for each page visited and is used to count and track pageviews.* | | | *1 day* | |
| \_ga | *.promena.net* | | *This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports.* | | | *1 year 1 month* | |
| \_ga\_C41497SV4W | *.promena.net* | | *This cookie is used by Google Analytics to persist session state.* | | | *1 year 1 month* | |
| \_gat | *.promena.net* | | *This cookie name is associated with Google Universal Analytics, according to documentation it is used to throttle the request rate - limiting the collection of data on high traffic sites.* | | | *1 minute* | |
| \_gat\_UA-55029763-3 | *.promena.net* | | *This is a pattern type cookie set by Google Analytics, where the pattern element on the name contains the unique identity number of the account or website it relates to. It is a variation of the \_gat cookie which is used to limit the amount of data recorded by Google on high traffic volume websites.* | | | *1 minute* | |
| li\_gc | *.linkedin.com* | | *Used to store guest consent to the use of cookies for non-essential purposes* | | | *6 months* | |
| **Targeting Cookies** | | | | | | | |
| **Cookie Name** | **Provider** | | **Purpose of use** | | | **Duration of Use** | |
| *IDE* | *.doubleclick.net* | | *This cookie is set by Doubleclick and carries out information about how the end user uses the website and any advertising that the end user may have seen before visiting the said website.* | | | *1 year* | |
| *test\_cookie* | *.doubleclick.net* | | *This cookie is set by DoubleClick (which is owned by Google) to determine if the website visitor's browser supports cookies.* | | | *15 minutes* | |
| *lidc* | *.linkedin.com* | | *This is a Microsoft MSN 1st party cookie that ensures the proper functioning of this website.* | | | *1 day* | |
| *\_gcl\_au* | *.promena.net* | | *Used by Google AdSense for experimenting with advertisement efficiency across websites using their services* | | | *3 months* | |
| *UserMatchHistory* | *.linkedin.com* | | *This cookie is used to track visitors so that more relevant ads can be presented based on the visitor's preferences.* | | | *1 month* | |
| *bcookie* | *.linkedin.com* | | *This is a Microsoft MSN 1st party cookie for sharing the content of the website via social media.* | | | *1 year* | |
| *bscookie* | *.www.linkedin.com* | | *Used by the social networking service, LinkedIn, for tracking the use of embedded services.* | | | *1 year* | |
| **Unclassified cookies** | | | | | | |
| **Cookie Name** | **Provider** | | **Purpose of use** | | **Duration of Use** | |
| *\_hjIncludedInSessionSample\_2865252* | *.promena.net* | |  | | *2 minutes* | |
| *li\_sugr* | *.linkedin.com* | |  | | *3 months* | |
| *\_hjSessionUser\_2865252* | *.promena.net* | |  | | *1 year* | |
| *\_hjSession\_2865252* | *.promena.net* | |  | | *30 minutes* | |
| *ln\_or* | *www.promena.net* | |  | | *1 day* | |

**Recipient Parties and Purposes for Transferring Personal Data**

Your personal data collected in line with the fulfillment of the above-mentioned Purposes; may be transferred to consultants whom we procure services from, to technical service providers related to information technology infrastructure and cookies and to our business partners, within the scope of our legitimate interest, to legally authorized public authorities and legally authorized private institutions within the scope of that it is expressly provided in the laws and fulfillment of our legal obligations pursuant to the legal grounds specified in Article 5 of the Law and in accordance with the rules regarding the transfer of personal data specified in Article 8 of the Law.

**Method of Personal Data Collection**

Your personal data is collected electronically through cookies within the scope of the fulfillment of the above-mentioned Purposes.

**Rights of the Data Subject under Article 11 of the Law**

As a data subject, we hereby inform you that you have the following rights under Article 11 of the Law:

* To learn whether your personal data are being processed,
* To request information if your personal data have been processed,
* To learn the purpose of the processing of your personal data and whether they have been used accordingly,
* To learn which third parties domestic or abroad your personal data has been transferred to,
* To request rectification in case your personal data has been processed incompletely or inaccurately and to demand the operations in this regard be reported to third parties your personal data has been transferred to,
* To demand the erasure or destruction of your personal data in the event that the reasons for the processing no longer exist even though it was processed in accordance with the Law and other relevant provisions and to demand the operations in this regard be reported to third parties your personal data has been transferred to,
* To object to negative consequences to you that are concluded, as a result of analysis of the processed personal data through solely automatic systems,
* To demand compensation for the damages that you have suffered as a result of an unlawful processing of your personal data.

In case you convey your requests concerning your above-listed rights, to our Company by filling out the Data Subject Application Form, which is available at [www.koczer.com/Content/assets/media/Veri\_Sahibi\_Basvuru\_Formu.pdf](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https:/www.koczer.com/Content/assets/media/Veri_Sahibi_Basvuru_Formu.pdf), depending on the nature of your request, your application will be concluded as soon as possible, within thirty days at the latest and in principle, free of charge. However, if the process requires additional costs, a fee may be demanded according to the tariff determined by the Personal Data Protection Board.

**Cookie Settings in Browser Settings**

You can change your preferences regarding cookies at any time by clicking the [●] icon on the Website. To do this, turn the buttons on the cookie management panel "on" or "off" according to your preference and click the "Save settings" button. Afterwards, refresh the page to activate your settings.

You can also gain partial control through the settings of the browser you use. You can access information on the management of cookies in frequently used browsers via the links below:

|  |  |
| --- | --- |
| Google Chrome | <https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3Dde%20sktop&hl=en> |
| MozillaFirefox | <https://support.mozilla.org/en-US/kb/enhanced-trackingprotection-firefox-desktop?redirectslug=enable-and-disable-cookies-websitepreferences&redirectlocale=en-US> |
| Internet Explorer | <https://support.microsoft.com/en-gb/windows/deleteand-manage-cookies-168dab11-0753-043d-7c16-ede5947fc64d> |
| Safari | <https://help.apple.com/safari/mac/9.0/#/sfri40732> |
| Opera | <https://help.opera.com/en/latest/web-preferences/> |