

# INFORMATION NOTICE REGARDING COOKIES AND LOG RECORDS

This notice is provided by LOCPICK ÇEVİRİ SES MÜZİK ÜRETİM VE PAZARLAMA HİZMETLERİ ANONİM ŞİRKETİ (the “**Company**”) in order to fulfil its “Obligation to Inform” under Law No. 6698 regarding the cookies and the log (internet access traffic) records processed in the event of use of our website.

**E-mail** : [kvkk@locpick.com](mailto:kvkk@locpick.com)  
**Telephone** : +90 539 739 89 13  
**Address** : Tomtom Mah. İstiklal Cad. Beyoğlu İş Merkezi No: 187A, 34415 Beyoğlu  
İstanbul/Türkiye  
**Website** : <https://locpick.com/>

## 1. What Is a Cookie?

**Types of cookies by duration of use:** They are divided into two as session cookies and persistent cookies. A session cookie is used for the purpose of ensuring continuity of the session, and these cookies are deleted when the user closes their browser. A persistent cookie is not deleted when the internet browser is closed and is automatically deleted on a certain date or after a certain period.

**First-party and third-party cookies:** They vary depending on the cookie placed by the website or domain. First-party cookies are placed directly by the website visited by the user, i.e., by the website address shown in the browser’s address bar. Third-party cookies, on the other hand, are placed by a domain different from the domain visited by the user.

**Types of cookies by purpose of use:** Cookies are generally divided according to their purpose of use as; (i) mandatory cookies, (ii) functional cookies, (iii) performance-analytical cookies and (iv) advertising-marketing cookies.

Mandatory Cookies: These cookies are the cookies required for the website to function. Such cookies are used mandatorily so that an information society service requested by the user can be provided.

Functional Cookies: These are cookies used for the purposes of remembering personalization and preferences on the website. These cookies are used for the purpose of providing functionalities other than mandatory cookies.

Performance-Analytical Cookies: These are cookies that enable statistical measurement to analyze users’ behaviors on the website. These cookies are used to improve the website, and this includes measuring the effect of advertisements on relevant persons. They are used by website owners for purposes such as estimating the number of unique visitors, identifying the most important search engine keywords that lead to a web page, or monitoring navigation on the website.

Advertising-Marketing Cookies: Cookies for advertising and marketing purposes are used to track users’ online movements in the internet environment, to identify their personal interests, and to display advertisements to users in the internet environment in line with these interests.

## 2. Which Cookies Are Processed by Our Company and How?

Cookies are also considered “personal data” within the scope of the Law. Your personal data are collected electronically through our website only via the cookies specified below and within the scope of fulfilling the purposes stated in the table:

Cookie Name	Processing Purpose	Type by Purpose of Use	Type by Party	Retention Period
_ga	Distinguishing users and creating visit statistics	Performance / Analytical	Third Party	1 year
_ga_KDGTX4XZ45	Associating measurement data	Performance / Analytical	Third Party	1 year
_gid	Analyzing user and session data	Performance / Analytical	Third Party	1 day
_gat_gtag_UA_662950_69	Limiting the request rate	Performance / Analytical	Third Party	1 year
_gcl_au	Monitoring user interactions within the scope of conversion measurement	Marketing	Third Party	3 months
ccconsent	Storing the user’s cookie preferences	Mandatory	First Party	1 year

Mandatory Cookies that we use on our website are processed within the scope of Article 5/2-c of the Law, “being directly related to the establishment or performance of a contract” and Article 5/2-f, “processing of data being mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.”

Cookies other than Mandatory Cookies are processed only if you give your explicit consent. You are provided with the opportunity to withdraw your consent at any time. Through the [cookie management panel](#), you can see the types of cookies used on our website and determine your preferences with the “on” or “off” options for all cookies other than Mandatory Cookies.

## 3. What Is a Log Record, Which of Your Log Record Data Are Processed and How?

Our Company, as an access provider, also processes your transaction security data containing log (internet access traffic) records arising from your use of the internet network made available for use within our Company. Your log record data processed by us are as follows:

- IP address
- Date and time information
- Accessed page/URL
- Browser and operating system information (user-agent)

Pursuant to Law No. 5651 on Regulation of Publications on the Internet and Combating Crimes Committed Through These Publications (“Law No. 5651”), your log records are processed in order to prevent unauthorized internet access, ensure system security, protect service continuity, detect bot traffic and possible cyber-attacks, and fulfil the requirements of Law No. 5651, on the basis of the conditions set out in Article 5/2-a of the Law, “explicitly stipulated in laws”, Article 5/2-ç, “being mandatory for the data controller to be able to fulfil its legal obligation”, and Article 5/2-f, “processing of data being mandatory for the legitimate interests of the data controller.”

We store them in both digital and physical environments by transferring them to the physical archives and information systems of our Company. Only if requested by authorized public institutions and organizations, they are transferred on the basis of Article 8/2-a of the Law and the conditions set out in Article 5/2-a, “explicitly stipulated in laws”, Article 5/2-ç, “being mandatory for the data controller to be able to fulfil its legal obligation”, and Article 5/2-f, “processing of data being mandatory for the legitimate interests of the data controller.”

Your personal data are processed for no more than 2 years, and if the reasons requiring processing cease to exist, they will be subject to one of the operations of deletion, destruction or anonymization in accordance with the Law and relevant legislation and pursuant to the Company’s retention and destruction policy.

### **1) Your Rights Regarding the Protection of Your Personal Data**

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

- learn whether your personal data are processed,
- request information if they have been processed,
- learn the purpose of processing and whether they are used in accordance with the purpose,
- know the third parties to whom they are transferred domestically / abroad,
- request correction if they are processed incompletely / incorrectly,
- request deletion / destruction,
- request notification of the transactions carried out pursuant to your correction, deletion or destruction requests to the third parties to whom the data are transferred,
- object to the occurrence of a result against you due to analysis exclusively by automated systems and
- request compensation of damages in case you suffer damages due to processing contrary to the Law.

Requests within the scope of Article 11 of Law No. 6698 regulating the rights of the data subject may be submitted in person in writing or via a notary to our Company’s address Tomtom Mah. İstiklal Cad. Beyoğlu İş Merkezi No: 187A, 34415 Beyoğlu, İstanbul/Türkiye; to our Company’s KEP address locpick@hs01.kep.tr; to kvkk@locpick.com e-mail address by using the e-mail address previously notified by the data subject and recorded in our system, or by using an e-mail address not recorded in our system by using secure electronic signature. Our Company finalizes the requests in the application within 30 (thirty) days depending on the nature of the request.