

# PRIVACY POLICY

CERO DIGI MRO Division — [www.cerodigi.net](http://www.cerodigi.net)

Effective Date: 21 August 2024

## 1. Introduction

This Privacy Policy explains how CERO DIGI TEKNOLOJİ SANAYİ VE TİCARET LİMİTED ŞİRKETİ (trading as CERO DIGI, hereinafter "we", "us", or "our") collects, uses, stores, and protects your personal data when you visit or interact with our website at [www.cerodigi.net](http://www.cerodigi.net).

We are committed to protecting your personal data in compliance with:

- Turkish Law No. 6698 on the Protection of Personal Data (KVKK)
- The European Union General Data Protection Regulation (GDPR) — applicable to visitors and customers in the EU/EEA
- Applicable Turkish commercial and electronic commerce legislation

Please read this policy carefully. By using our website, you acknowledge that you have read and understood the practices described herein.

## 2. Data Controller

The data controller responsible for your personal data is:

**Legal Name:** CERO DIGI TEKNOLOJİ SANAYİ VE TİCARET LİMİTED ŞİRKETİ

**Trading Name:** CERO DIGI

**Registered Address:** KEMALPAŞA MAH. MEHMET AKİF BLV. NO: 238/1, BAĞCILAR / İSTANBUL, TÜRKİYE

**Website:** [www.cerodigi.net](http://www.cerodigi.net)

**Email:** [info@cerodigi.com](mailto:info@cerodigi.com) | [info@cerodigi.net](mailto:info@cerodigi.net)

Trade registry number and VAT/Tax ID are available upon written request to the above contact addresses.

## 3. What Personal Data We Collect

We collect personal data through the following channels:

### 3.1 RFQ / Part Request Form

- First name and last name
- Email address
- Required part number (PN) and condition code
- Any additional requirements submitted voluntarily

### 3.2 Newsletter / Email Subscription

- Email address
- Name (optional)

### 3.3 Job Applications / Careers

- Full name, contact information (email, phone)
- CV / resume and cover letter contents
- Professional background, qualifications, and work history

### 3.4 User Accounts / Login Portal

- Username and encrypted password
- Account registration details (name, company, email, role)
- Activity logs within the portal

### 3.5 Automatically Collected Data

When you visit our website, we may automatically collect:

- IP address and approximate geographic location
- Browser type, operating system, and device information
- Pages visited, time spent, and navigation paths
- Referral source (how you arrived at our website)
- Cookies and similar tracking technologies (see Section 8)

## 4. Purposes and Legal Basis for Processing

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We process your personal data for the following purposes and rely on the following legal bases:

### 4.1 Responding to RFQ Enquiries

Purpose: To evaluate and respond to your part requests, provide quotations, and fulfil aviation component supply orders.

Legal basis: Performance of a contract / pre-contractual steps (KVKK Art. 5(2)(c); GDPR Art. 6(1)(b)).

### 4.2 Newsletter & Marketing Communications

Purpose: To send you updates on our products, services, industry news, and promotions.

Legal basis: Your explicit consent (KVKK Art. 5(1); GDPR Art. 6(1)(a)). You may withdraw consent at any time.

### 4.3 Job Applications

Purpose: To assess your suitability for open or future positions at CERO DIGI.

Legal basis: Pre-contractual steps and legitimate interest (KVKK Art. 5(2)(c)(f); GDPR Art. 6(1)(b)(f)).

## 4.4 User Account Management

Purpose: To create, maintain, and manage secure access to our customer or partner portal.

Legal basis: Performance of a contract and legitimate interest (KVKK Art. 5(2)(c)(f); GDPR Art. 6(1)(b)(f)).

## 4.5 Website Analytics & Improvement

Purpose: To understand how visitors use our website and improve user experience, content, and performance.

Legal basis: Legitimate interest and, where consent is required, your explicit consent via cookie banner (KVKK Art. 5(2)(f); GDPR Art. 6(1)(a)(f)).

## 4.6 Legal and Regulatory Compliance

Purpose: To comply with applicable Turkish laws, regulatory obligations, and to establish, exercise, or defend legal claims.

Legal basis: Legal obligation and legitimate interest (KVKK Art. 5(2)(a)(e); GDPR Art. 6(1)(c)(f)).

## 5. How We Share Your Personal Data

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We do not sell, rent, or trade your personal data to third parties. We may share data in the following limited circumstances:

### 5.1 Technology & Hosting Providers

Our website infrastructure is hosted across servers located in Türkiye, the Netherlands, and the United States. Hosting providers process data solely on our behalf under data processing agreements and are bound by applicable data protection obligations.

### 5.2 Analytics & Advertising Platforms

We use the following third-party platforms which may receive or process your data as described in their own privacy policies:

- Google Analytics — website usage analytics (Google LLC, USA)
- Google Ads — conversion tracking and advertising (Google LLC, USA)
- Meta Pixel (Facebook / Instagram) — advertising and retargeting (Meta Platforms, Inc., USA)
- LinkedIn Insight Tag — B2B advertising and audience insights (LinkedIn Corporation, USA)

Data transfers to these US-based providers are subject to appropriate safeguards, including Standard Contractual Clauses (SCCs) where applicable under GDPR.

### 5.3 Legal Authorities

We may disclose personal data to competent courts, law enforcement, regulatory bodies, or other public authorities if required by law or where necessary to protect our legal rights.

### 5.4 Internal Processing

We handle all CRM and lead management activities internally. No third-party CRM or email marketing platforms are used for storing or processing enquiry data.

## 6. Data Retention

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We retain your personal data only for as long as necessary for the purposes described in this policy, and in accordance with applicable legal requirements:

- RFQ enquiries and business correspondence: 5 years, in accordance with Turkish commercial law retention requirements
- Job applications (unsuccessful): Up to 1 year from the date of application, unless you consent to a longer period
- Job applications (resulting in employment): Retained for the duration of employment plus the statutory period
- User account data: For the duration of the active account plus 5 years following closure
- Newsletter subscription data: Until you withdraw consent, plus a reasonable period thereafter
- Website analytics data: As determined by the respective platform's default retention settings (typically 14–26 months)

Upon expiry of the applicable retention period, personal data is securely deleted or anonymised.

## 7. Your Rights

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Subject to applicable law, you have the following rights regarding your personal data:

- Right to be informed — to know what data we hold about you and how it is used
- Right of access — to request a copy of the personal data we hold about you
- Right to rectification — to request correction of inaccurate or incomplete data
- Right to erasure — to request deletion of your data, subject to legal retention obligations
- Right to restriction — to request that we limit the processing of your data in certain circumstances
- Right to data portability — to receive your data in a structured, commonly used format (GDPR)
- Right to object — to object to processing based on legitimate interest or for direct marketing
- Right to withdraw consent — where processing is based on consent, you may withdraw at any time without affecting prior lawful processing
- Right to lodge a complaint — you have the right to file a complaint with the Turkish Personal Data Protection Authority (KVKK Kurumu) or, if in the EU/EEA, your local supervisory authority

To exercise any of your rights, please contact us at:

**Email:** [info@cerodigi.com](mailto:info@cerodigi.com) | [info@cerodigi.net](mailto:info@cerodigi.net)

**Address:** KEMALPAŞA MAH. MEHMET AKİF BLV. NO: 238/1, BAĞCILAR / İSTANBUL, TÜRKİYE

We will respond to your request within 30 days. In complex cases, we may extend this period by a further 60 days, of which we will notify you.

## 8. Cookies and Tracking Technologies

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Our website uses cookies and similar tracking technologies to operate, analyse, and improve our services. Cookies are small data files stored on your device.

We use the following categories of cookies:

### **Strictly Necessary Cookies**

Essential for the website to function. These cannot be disabled. They include session management, security, and form functionality cookies.

### **Analytics Cookies**

Used by Google Analytics to collect anonymised data on how visitors use our site (pages visited, session duration, traffic source). This helps us improve our website.

### **Marketing & Advertising Cookies**

Set by Google Ads, Meta Pixel, and LinkedIn Insight Tag to deliver relevant advertising and measure campaign performance. These cookies may track your activity across other websites.

You can manage your cookie preferences via our cookie consent banner displayed on your first visit. You may also manage cookies through your browser settings; however, disabling certain cookies may affect website functionality.

For more detail, please refer to our separate Cookie Policy available on this website.

## **9. Data Security**

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We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, alteration, disclosure, or destruction. These measures include:

- Secure HTTPS encryption across all web pages
- Access controls and authentication measures for internal systems
- Regular review of data handling practices and security procedures
- Contractual data protection obligations with hosting and service providers

Despite these measures, no method of internet transmission or storage is 100% secure. In the event of a data breach that poses a risk to your rights and freedoms, we will notify you and the relevant authorities as required by law.

## **10. International Data Transfers**

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Your personal data may be transferred to and processed in countries outside Türkiye and the European Economic Area (EEA), including the United States, in connection with our use of hosting services and third-party analytics and advertising platforms.

Where such transfers occur, we ensure appropriate safeguards are in place, including:

- Adequacy decisions recognised by the relevant regulatory authorities
- Standard Contractual Clauses (SCCs) approved by the European Commission
- Data processing agreements with all third-party processors

## **11. Third-Party Links**

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Our website may contain links to third-party websites, including aviation industry partners, suppliers, and regulatory bodies. We are not responsible for the privacy practices or content of those websites and encourage you to review their respective privacy policies.

## 12. Children's Privacy

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Our website and services are directed exclusively at business and professional users. We do not knowingly collect personal data from individuals under the age of 18. If you believe a minor has submitted data to us, please contact us immediately and we will arrange for its deletion.

## 13. Changes to This Privacy Policy

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We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or business operations. The updated policy will be published on this page with a revised effective date.

We encourage you to review this policy periodically. Where changes are material, we will take reasonable steps to notify you directly.

## 14. Contact Us

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If you have any questions, concerns, or requests relating to this Privacy Policy or the handling of your personal data, please contact us:

**Company:** CERO DIGI TEKNOLOJİ SANAYİ VE TİCARET LİMİTED ŞİRKETİ

**Trading as:** CERO DIGI

**Address:** KEMALPAŞA MAH. MEHMET AKİF BLV. NO: 238/1, BAĞCILAR / İSTANBUL, TÜRKİYE

**Email:** info@cerodigi.com | info@cerodigi.net

**Website:** www.cerodigi.net

Trade registry number, VAT/Tax ID, and phone number are available upon written request.