

# Privacy Policy

This privacy policy applies between you, the User of this Website and Elimko Ltd, the owner and provider of this Website. Elimko Ltd takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website.

**Please read this privacy policy carefully.**

## Definitions and interpretation

1. In this privacy policy, the following definitions are used:

<b>Data</b>	collectively all information that you submit to Elimko Ltd via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
<b>Cookies</b>	a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below ( <b>Cookies</b> );
<b>Data Protection Laws</b>	any applicable law relating to the processing of personal Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation, for as long as the GDPR is effective in the UK;
<b>Elimko Ltd, or us</b>	Elimko Ltd, a company incorporated in Turkey with registered number 37935 whose registered office is at 8. Cad. 21. Sok. No:16 Emek/ Ankara Turkey;
<b>User or you</b>	any third party that accesses the Website and is not either (i) employed by Elimko Ltd and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Elimko Ltd and accessing the Website in connection with the provision of such services; and
<b>Website</b>	the website that you are currently using, Elimko.com.tr, and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. In this privacy policy, unless the context requires a different interpretation:
  - a. the singular includes the plural and vice versa;
  - b. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
  - c. a reference to a person includes firms, companies, government entities, trusts and partnerships;
  - d. "including" is understood to mean "including without limitation";
  - e. reference to any statutory provision includes any modification or amendment of it;
  - f. the headings and sub-headings do not form part of this privacy policy.

### **Scope of this privacy policy**

2. This privacy policy applies only to the actions of Elimko Ltd and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.
3. For purposes of the applicable Data Protection Laws, Elimko Ltd is the "data controller". This means that Elimko Ltd determines the purposes for which and the manner in which, your Data is processed.

### **Data collected**

4. We do not collect any data from you automatically.

### **Data that is given to us by you**

5. Elimko Ltd will collect your Data in a number of ways, for example:
  - a. when you contact us through the Website, by telephone, post, e-mail or through any other means;
  - b. when you use our services;

in each case, in accordance with this privacy policy.

### **Our use of Data**

6. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:
  - a. internal record keeping;
  - b. contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update the Website;

in each case, in accordance with this privacy policy.

7. We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).

8. We may use your Data to show you Elimko Ltd adverts and other content on other websites. If you do not want us to use your data to show you Elimko Ltd adverts and other content on other websites, please turn off the relevant cookies (please refer to the section headed "Cookies" below).

## Who we share Data with

9. We may share your Data with the following groups of people for the following reasons:

- a. our employees, agents and/or professional advisors - to obtain advice from professional advisers;

in each case, in accordance with this privacy policy.

## Keeping Data secure

10. We will use technical and organisational measures to safeguard your Data, for example:

- a. access to your account is controlled by a password and a user name that is unique to you.
- b. we store your Data on secure servers.

11. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: [elimko@elimko.com.tr](mailto:elimko@elimko.com.tr) .

## Data retention

12. Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted.

13. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

## Your rights

14. You have the following rights in relation to your Data:

- a. **Right to access** - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
- b. **Right to correct** - the right to have your Data rectified if it is inaccurate or incomplete.
- c. **Right to erase** - the right to request that we delete or remove your Data from our systems.
- d. **Right to restrict our use of your Data** - the right to "block" us from using your Data or limit the way in which we can use it.
- e. **Right to data portability** - the right to request that we move, copy or transfer your Data.
- f. **Right to object** - the right to object to our use of your Data including where we use it for our legitimate interests.

15. To make enquiries exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: [elimko@elimko.com.tr](mailto:elimko@elimko.com.tr).

16. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

## Links to other websites

17. This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

## Changes of business ownership and control

18. Elimko Ltd may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Elimko Ltd. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

19. We may also disclose Data to a prospective purchaser of our business or any part of it.

20. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

## Cookies

21. This Website may place and access certain Cookies on your computer. Elimko Ltd uses Cookies to improve your experience of using the Website. Elimko Ltd has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

22. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

23. Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Elimko Ltd to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

24. This Website may place the following Cookies:

Type of Cookie	Purpose
Analytical/performance cookies	They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
Targeting cookies	These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

25. You can find a list of Cookies that we use in the Cookies Schedule.
26. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.
27. You can choose to delete Cookies at any time; however, you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
28. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.
29. For more information, generally on cookies, including how to disable them, please refer to [aboutcookies.org](http://aboutcookies.org). You will also find details on how to delete cookies from your computer.

## **General**

30. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
31. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
32. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

## **Changes to this privacy policy**

33. Elimko Ltd reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

You may contact Elimko Ltd by email at [elimko@elimko.com.tr](mailto:elimko@elimko.com.tr).

## **Attribution**

34. This privacy policy was created using by Elimko Ltd. (Elimko.com.tr)

**16 February 2022**