

ELG Partner Program

Privacy Notice

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1. Identity of the Data Controller

Under Turkish Personal Data Protection Law No. 6698 ("KVKK"), our translation service providers under EDU Language Group (EDU Çeviri, Turkish Translation Office, and Transistent) act as the data controller.

Contact information:

Address: Kore Şehitleri Cad., Mithat Ünlü Sok. Plaza 21D 14/17, 34394 Zincirlikuyu, Istanbul

Email: info@edulanguagegroup.com

Phone: +90 212 286 86 36

2. Personal Data Processed and Purposes

The following personal data is processed during your application to or participation in the ELG Partner Program:

Data Category	Data Type	Processing Purpose
Identity data	Name, surname	Evaluation of partnership application
Contact data	Email, phone, address	Communication during and after application
Professional data	Profession, company, sector	Eligibility assessment and segmentation
Payment data	Bank account, IBAN	Execution of commission payments
Transaction data	Client referral records	Commission calculation and reporting
Legal data	Tax ID, identity number	Fulfillment of legal obligations

2.1. Detailed Processing Purposes

Your personal data is processed for the following purposes, within the data processing conditions specified in Articles 5 and 6 of KVKK:

- Establishment and performance of the partnership agreement
- Management of client referral processes and maintenance of commission accounts

- Execution of commission payments and fulfillment of related legal obligations
- Fulfillment of legal obligations (tax, accounting, audit)
- Execution of information security processes and ensuring account security
- Conducting communication activities with partners
- Management of legal proceedings and dispute resolution

3. Legal Basis for Processing

Your personal data is processed based on the following legal grounds set forth in Article 5 of KVKK:

- Performance of a contract — Data required for establishing and performing the partnership agreement
- Fulfillment of legal obligations — Data processed under tax, accounting, audit, and other statutory obligations
- Legitimate interest — Necessary for the legitimate interests of the data controller (e.g. audit, reporting)
- Explicit consent — Your explicit consent obtained for purposes outside the above grounds

4. Transfer of Personal Data

Your personal data may be transferred to the following third parties in accordance with Articles 8 and 9 of KVKK, for the purposes specified above:

- Brand entities under EDU Language Group (EDU Çeviri, TTO, Transistent)
- Authorized public institutions and agencies (tax offices, courts, etc.)
- Banks and payment institutions (for execution of commission payments)
- Service providers (accounting, legal counsel, IT infrastructure providers)
- Overseas server providers (within the scope of Article 9 of KVKK, with data security measures)

Your personal data shall not be shared with any third party other than the recipient groups listed above and shall not be sold for commercial purposes.

5. Method of Data Collection

Your personal data is collected through the following methods:

- Online application and user account creation processes via affiliate.edulanguagegroup.com
- Communication via contact form, email, and telephone
- Bank and invoice transactions related to commission payments
- Client referral and commission tracking processes

6. Your Rights Under KVKK

Pursuant to Article 11 of KVKK, as a data subject, you have the following rights:

- To learn whether your personal data is being processed
- To request information if your personal data has been processed

- To learn the purpose of processing and whether the data is used for its intended purpose
- To know third parties to whom your personal data has been transferred domestically or abroad
- To request correction of personal data that has been processed incompletely or inaccurately
- To request deletion or destruction of personal data within the conditions stipulated in KVKK
- To request that correction, deletion, or destruction be communicated to third parties to whom data was transferred
- To object to a result against you arising from analysis of your data exclusively through automated systems
- To claim compensation for damages arising from unlawful processing of your personal data

7. Data Retention Period

Your personal data is retained for the period necessary for the processing purposes specified above and in accordance with statutory retention obligations:

Data Type	Retention Period	Legal Basis
Contract data	Contract end + 10 years	TCO Art. 146
Tax records	5 years from issuance	TPL Art. 253
Social security data	10 years	Law No. 5510
Other communication data	Contract end + 3 years	Legitimate interest / TCO

8. Exercising Your Rights — Application

To exercise your rights listed in Article 11 of KVKK, you may submit a written application containing your identity information and request through one of the following methods:

- Email: Electronic mail to kvkk@edulanguagegroup.com
- Written application: Signed petition to the company address
- Via notary: Through notary public channel
- Registered Electronic Mail (KEP): Via our KEP address

• APPLICATION TIMELINE

Your applications will be concluded free of charge within 30 (thirty) days at the latest, depending on the nature of your request. However, if the process requires an additional cost, the fee set by the Personal Data Protection Board may apply.

9. Updates to This Privacy Notice

EDU Language Group reserves the right to update this Privacy Notice at any time to ensure compliance with KVKK and for other reasons. The updated text shall enter into force on the date it

is published at affiliate.edulanguagegroup.com.