

Clarification Text

Last updated: 11 August 2026

As ONYX AGENT BİLİŞİM TEKNOLOJİLERİ ANONİM ŞİRKETİ (the “Company” or “Onyx Agent”), we attach great importance to the security and confidentiality of your personal data. Accordingly, in line with Turkish Personal Data Protection Law No. 6698 (the “KVKK” or the “Law”) and related legislation, we would like to inform you about the personal data we process in our capacity as data controller.

01

Purposes of Processing Personal Data

Your personal data is processed within the scope of the personal data processing conditions and purposes set out in Articles 5 and 6 of the KVKK, for the purposes of enabling you to benefit from the products and services offered by our Company, carrying out the necessary work by our business units to that end, ensuring the legal and commercial security of our Company and of the persons who have a business relationship with our Company, and determining and implementing our Company's commercial and business strategies:

- Conducting and managing recruitment processes (publishing job postings, receiving applications, evaluating candidates and tracking process stages),
- Conducting, recording and evaluating voice-based pre-screening interviews,
- Matching candidates against job posting requirements and carrying out competency assessments,
- Carrying out post-hire onboarding and offboarding processes,
- Digitalising human resources processes and increasing efficiency,
- Ensuring identity verification and transaction security,
- Measuring and improving service quality,
- Fulfilling legal obligations,

- Managing customer and candidate requests and complaints,
 - Planning and executing information security processes.
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02

Categories of Personal Data Processed

Depending on the relevant process, the following categories of data may be processed by our Company:

- **Identity Information** (First name, surname, Turkish ID number and similar, where applicable under Turkish law)
 - **Contact Information** (Email address, telephone number, address and similar)
 - **Personnel Information** (Curriculum vitae, education status, work experience, certificates, foreign language proficiency and similar)
 - **Audio Data** (Recordings of voice-based pre-screening interviews and the written transcripts of those recordings)
 - **Assessment Data** (Match scores against job posting requirements, AI-assisted assessment outputs, recruiter notes, process stage information)
 - **Transaction Security Information** (IP address, log records, device and browser information)
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03

Transfer of Personal Data

In line with the purposes stated above and in accordance with the conditions set out in Articles 8 and 9 of the Law, your personal data may be transferred to:

- The employer organisations from which you receive services or to which you have applied,
- Our business partners and suppliers (cloud service providers, artificial intelligence infrastructure providers, email and communication service providers, technology consultants and similar),
- Public institutions and organisations authorised by law,

- Judicial authorities in the event of legal disputes.

Transfers abroad are carried out on the basis of the candidate's explicit consent or the other exceptional circumstances set out in the Law (see the [Explicit Consent Text on the Transfer of Personal Data Abroad](#)).

04

Method of Collecting Personal Data and Legal Grounds

Your personal data is collected by our Company in electronic form through our website, the candidate portal, the recruitment platform, email, telephone and integrated systems. This data is collected and processed on the following legal grounds:

- Being expressly provided for by law,
 - Being directly related to the establishment or performance of a contract,
 - Being necessary for the data controller to fulfil its legal obligation,
 - Being necessary for the legitimate interests of the data controller, provided that this does not harm the fundamental rights and freedoms of the data subject,
 - Obtaining explicit consent.
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05

Rights of the Data Subject

As data subjects, under Article 11 of the Law you have the right to:

- Learn whether your personal data is being processed,
- Request information if your personal data has been processed,
- Learn the purpose of processing your personal data and whether it is used in accordance with that purpose,
- Know the third parties to whom your personal data is transferred, in Türkiye or abroad,

- Request correction of your personal data if it has been processed incompletely or incorrectly,
- Request the deletion or destruction of your personal data within the conditions set out in Article 7 of the Law,
- Request that correction, deletion and destruction operations be notified to the third parties to whom your personal data has been transferred,
- Object to any outcome to your detriment arising from the analysis of your processed data exclusively through automated systems,
- Request compensation for damages you suffer as a result of the unlawful processing of your personal data.

06

Contact

To exercise the rights set out above and to submit your requests regarding your personal data, you may send your application in writing or by using a registered electronic mail (KEP) address, a secure electronic signature, a mobile signature, or the email address previously notified to the data controller by the data subject and registered in the data controller's systems, through the contact channels below:

ONYX AGENT BİLİŞİM TEKNOLOJİLERİ ANONİM ŞİRKETİ

EMAIL

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