LEGAL

# Cross-border Data Transfer

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This text has been prepared by ONYX AGENT BİLİŞİM TEKNOLOJİLERİ ANONİM ŞİRKETİ (the "Company" or "Onyx Agent"), acting in its capacity as data controller, for the purpose of obtaining your explicit consent to the transfer abroad of the personal data it processes, in accordance with Article 9 of Turkish Personal Data Protection Law No. 6698 (the "KVKK" or the "Law") and related legislation. Our Company works with technology suppliers and cloud infrastructures that operate on a global scale, which makes it necessary for your data to be transferred abroad within defined security standards.

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## Legal Ground and Scope of the Transfer Abroad

Under Article 9 of the KVKK, personal data may not be transferred abroad without the explicit consent of the data subject. However, given the nature of the services provided by our Company, application hosting, data storage and artificial intelligence analysis infrastructures are operated through service providers located abroad. Accordingly, by means of this Explicit Consent Text you will have permitted your personal data to be transferred abroad, stored on servers abroad and processed there.

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## Categories of Personal Data to be Transferred Abroad

The personal data classified below will be transferred abroad for the purposes stated:

- **Identity and Contact Information:** First name, surname, email address, telephone number, user identification numbers.
- **Professional Experience and Education Data:** Curriculum vitae, education details, certificates, foreign language proficiency, work experience, competencies and skills.

- **Audio Records:** Voice recordings taken during voice-based pre-screening interviews.
- **Interview Content Data:** Spoken and written answers given to pre-screening questions, written transcripts of voice recordings.
- **Technical and Transaction Data:** IP addresses used to connect, device information, browser type, operating system information, log records.
- **Assessment Results:** Assessment outputs produced by artificial intelligence, match scores, competency scoring.

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## Countries and Recipient Groups to which Transfers are Made

Your personal data may be transferred to the following categories of service provider whose servers are located abroad and which are necessary for the conduct of our business processes:

- **United States of America (USA) and European Union (EU) Countries:** Application hosting, database, cache and file storage service providers, voice interview infrastructure providers, email and notification service providers.
- **United States of America (USA):** Artificial intelligence based language model, text processing and analysis infrastructure providers (for candidate assessment and interview analysis processes).

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## Purposes of the Transfer

Transfers of data abroad are carried out solely for the following specific purposes:

- Operating the application and storing data securely and accessibly.
- Conducting, recording and transcribing voice-based pre-screening interviews.
- Carrying out candidate assessments and matching operations against job posting requirements using artificial intelligence models.

- Running the algorithms belonging to our Company and providing the service without interruption.
- Delivering process notifications to candidates and users.
- Ensuring business continuity and benefiting from infrastructure services at global standards.

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## Data Security and Measures Taken

Our Company takes the following measures to secure your data:

- The main database and file storage are hosted in data centres in the European Union (Frankfurt, Germany). Application servers run in the EU (Amsterdam, Netherlands). Some services, including AI language models and email delivery, are provided from the United States.
- **Encryption:** Data transferred abroad is protected by encryption both in transit (TLS 1.2 and above) and at rest.
- **Access Control:** Access to data is restricted through role-based authorisation and authentication mechanisms.
- **Contractual Safeguards:** Data processing and confidentiality agreements are concluded with service providers.

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## Withdrawal of Consent and its Consequences

You have the right to withdraw your consent to transfers abroad at any time. However, since a significant part of the services provided by our Company relies on cloud and artificial intelligence infrastructures based abroad, if you withdraw your consent:

- It may not be technically possible for you to benefit from voice-based pre-screening and assessment services.
- Your ongoing candidate assessment processes may remain incomplete or be cancelled.

- Your data previously transferred abroad will, upon your withdrawal request, be deleted from the relevant servers or anonymised (without prejudice to statutory retention obligations).

Withdrawal of consent does not affect the lawfulness of processing carried out before the date of withdrawal.

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## Declaration of Explicit Consent

> I have read and understood the text above. For the purposes of performing the services offered by the Company, ensuring data security and enabling AI-assisted assessments to be carried out, I **GIVE MY EXPLICIT CONSENT**, of my own free will and without any hesitation, following the information provided to me on the matter, to the **TRANSFER** of my personal data to service providers, business partners and suppliers whose servers are located abroad, principally in European Union countries and the United States of America, and to its **STORAGE** and **PROCESSING** on servers in those countries.

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## Contact

You may contact us with any questions:


**ONYX AGENT BİLİŞİM TEKNOLOJİLERİ ANONİM ŞİRKETİ**

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