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This text is a general framework; for specific needs please contact us.
operations.

The controller may request a compliance audit with reasonable notice, without disrupting

6. Audit

reasonable grounds.

Reasonable notice is given before adding a sub-processor; the controller may object on

5. New sub-processors and objection

- AWS SES (eu-north-1): transactional email delivery (recipient address and message content).
- Cloudflare: CDN, WAF and DDoS mitigation (traffic metadata).
- Hosting (Turkey): server infrastructure and data storage.

terms. For the current list, see the sub-processor inventory in our privacy policy.

The following sub-processors are used solely for the stated purpose and under data-processing

4. Sub-processors (third parties)

- Assist with data-subject requests (access/erasure/portability).
- Breach notification without undue delay (aligned with the 72-hour process).
- Confidentiality and limited staff access.
- Appropriate technical and organizational measures (encryption, access control, logging).
- Process only on documented instructions.

3. Processor obligations

termination, data is returned or destroyed.

Processing is limited to what is necessary to provide the service and for its duration; upon

2. Subject and duration

- Sub-processor: a third party engaged by the processor (hosting, email, etc.).
- Data processor: processes data on the controller's instructions.
- Data controller: determines the purpose and means of processing.

1. Parties and definitions

data, based on Turkish KVKK art. 12 and related regulation.

processor (XtroEngine), and the sub-processors (third parties) used when processing personal

This document defines the obligations between the data controller (customer/user) and the data

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Data Processing Agreement (DPA)