

NODE101 TEKNOLOJİ ANONİM ŞİRKETİ

WEBSITE AI POWERED CHATBOT AND SEARCH FEATURE PRIVACY NOTICE

This Privacy Notice explains how your personal data is processed when you use the AI-powered chatbot and on-site search feature on our website.

1. DATA CONTROLLER AND CONTACT DETAILS

This Privacy Notice has been prepared in relation to the processing of personal data in connection with the AI-powered chatbot and on-site search feature made available at <https://node101.io> by NODE101 TEKNOLOJİ ANONİM ŞİRKETİ ("Node101" or the "Company").

Node101 is the data controller. Contact details: Karanfil Sokak, Villa 13 Levent, Beşiktaş, İstanbul, Türkiye, 34330; hello@node101.io.

2. SCOPE AND PURPOSE

This Notice concerns questions submitted to the AI-powered chatbot and search terms entered into the on-site search feature. Processing related to general website use, cookies, membership, service requests, or commercial communications is governed by the separate notices and policies applicable to those activities.

The chatbot and search feature are used to provide general information about our products and services, respond to user questions, direct users to relevant content, and improve user experience. This Notice is not a consent form.

3. CATEGORIES OF PERSONAL DATA THAT MAY BE PROCESSED

Depending on how the feature is used, the following categories of data may be processed: (i) content entered by the user, such as chat messages, question text, and search terms; (ii) technical security data, such as the time of the transaction, session information, IP address, browser and device information, error logs, and security logs; and (iii) other information constituting personal data where it is voluntarily entered into a message or search field by the user.

The chatbot and search feature are not designed for the submission of special-category personal data, passwords, API keys, wallet private keys, seed phrases, payment information, or similar confidential information. Please do not share such information.

4. PURPOSES AND LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

Personal data may be processed to handle and respond to a question or search request, provide information about products and services, operate and secure the feature, detect errors, prevent misuse, provide technical support, and improve service quality.

Depending on the circumstances, personal data may be processed pursuant to the legal grounds set out in Article 5 of the Turkish Personal Data Protection Law No. 6698 ("KVKK"), including where processing is necessary for the establishment or performance of a contract, compliance with a legal obligation, the establishment, exercise, or protection of a right, or the legitimate interests of the Company, provided that fundamental rights and freedoms are not prejudiced. Where explicit consent is required, it is obtained separately from this Notice.



5. METHOD OF COLLECTION AND USE OF ARTIFICIAL INTELLIGENCE

Data is collected directly when you enter it into the chatbot or search fields and automatically while you use the website. The chatbot is used to generate general responses based on frequently asked questions and the information resources available on the website.

Chatbot responses are generated automatically and are provided for general informational purposes only. They do not constitute investment, financial, legal, tax, technical, or other professional advice. The responses are not used as the basis for a decision producing legal effects concerning an individual or similarly significant effects solely through automated means.

Chat content may be accessed only by authorised Node101 personnel who need access for their duties, and only to the extent necessary for security, support, quality assurance, and improvement purposes.

6. TRANSFER OF PERSONAL DATA AND INTERNATIONAL TRANSFERS

Node101 is committed to protecting user privacy and information security at the highest level. Accordingly, the following principles apply to the transfer of personal data processed in connection with the Chatbot service and to the server infrastructure used for that service:

The hosting, server, and infrastructure systems used to provide the Chatbot service, transmit messages, and ensure system continuity are located abroad. In this context, your personal data is transferred abroad in accordance with the general Privacy Notice available on our website and the conditions set out in Article 9 of the Turkish Personal Data Protection Law No. 6698 (KVKK), in particular on the basis of appropriate safeguards prescribed by law, such as Standard Contractual Clauses.

The messages, questions, and technical data you submit through the chat interface are not transferred for commercial or advertising purposes to unauthorised third parties or independent AI providers, other than the secure hosting and infrastructure services described above, unless you provide explicit consent or a legal obligation requires the transfer.

User data is not shared with third parties for the purpose of training general-purpose publicly available AI models without your explicit consent.

Your personal data may be transferred on a limited basis to authorised public authorities and judicial or administrative bodies only where they lawfully request it, for the purpose of fulfilling legal obligations pursuant to Article 8/2-a of the KVKK.

7. RETENTION PERIOD AND DATA SECURITY

Personal data is retained for the period required by the relevant processing purpose, taking into account retention periods imposed by applicable law. Once the processing purpose has ceased and there is no legal ground requiring retention, the data is deleted, destroyed, or anonymised.

Node101 implements appropriate technical and administrative measures to prevent unlawful processing of or access to personal data and to ensure its preservation. However, absolute security of communications over the internet cannot be guaranteed; please do not enter confidential or sensitive information into the chatbot or search field.



8. YOUR RIGHTS UNDER THE KVKK AND HOW TO APPLY

Under Article 11 of the KVKK, you have the right to learn whether your personal data is processed; request information if it has been processed; learn the purpose of processing and whether it is used in accordance with that purpose; know the third parties to whom data is transferred; request correction of incomplete or inaccurate data; request deletion or destruction where the statutory conditions are met; request that these actions be notified to third parties to whom the data was transferred; object to a result that is adverse to you and arises from analysis by exclusively automated systems; and claim compensation for damage arising from unlawful processing.

You may submit your requests in accordance with the application procedure prescribed by the KVKK and its secondary legislation, in writing to Karanfil Sokak, Villa 13 Levent, Beşiktaş, İstanbul, Türkiye, 34330, or by secure electronic signature, mobile signature, or another method permitted by applicable law to hello@node101.io.

9. EFFECTIVE DATE AND UPDATES

This Privacy Notice takes effect on 26 September 2026. Node101 may update it in response to changes in law or in the operation of the feature; the current version will be published on the website.

