

NODE101 TECHNOLOGY INC

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

1. DATA CONTROLLER

As Node101 Teknoloji Anonim Şirketi ("Node101" or the "Company"), we process the personal data of persons who visit our website located at <https://node101.io> (the "Site"), create an account through the Site, benefit from our products and services, or contact our Company, in our capacity as data controller under Turkish Law No. 6698 on the Protection of Personal Data ("KVKK").

This Privacy Notice has been prepared to inform you about the scope and purposes for which your personal data is processed, to whom and for what purposes it may be transferred, the method and legal grounds for collecting personal data, and your rights under the KVKK.

Data Controller: Node101 Teknoloji Anonim Şirketi
Address: Levent Mah. Karanfil Sok. No:13 Beşiktaş / İstanbul
MERSIS No: 0631205545100001
Email: sales@node101.io
Website: node101.io

2. PERSONAL DATA PROCESSED

Within the scope of your use of the Site and the Services, the following personal data may be processed:

2.1. Identity Information

Name, surname, Turkish identity number or tax identification number, and other identity information that may be required within the scope of legislation or billing processes.

2.2. Contact Information

Email address, telephone number, address, and other contact information provided by you when communicating with our Company.

2.3. Customer and Transaction Information

User and customer number, order information, purchased product or service, subscription and package information, subscription start and end dates, order and transaction history, invoice information, request and complaint information.

2.4. Financial Information

Payment and billing information, payment status, transaction amount, and information regarding the payment method.



Where credit or debit card information is processed directly by the payment service provider, Node101 does not store card numbers, CVV/CVC, or similar payment verification information in its own systems.

2.5. Transaction Security and Technical Usage Information

IP address, login and logout records, session information, date and time information, device and browser information, system and security logs, API access and usage records, API request information, endpoint usage information, error and event records, and other technical records generated to ensure the security and continuity of the Services.

2.6. Request, Complaint, and Communication Information

Correspondence carried out with Node101 via email, support system, or other communication channels, support requests, complaints, feedback, and related transaction records.

2.7. Legal Transaction Information

Requests received from authorized institutions and organizations, information regarding legal disputes and processes, and records kept for the purpose of fulfilling our Company's legal obligations and protecting its rights.

3. PURPOSES OF PROCESSING PERSONAL DATA

Your personal data may be processed for one or more of the following purposes, depending on its nature:

- a) creating and managing Site membership and user accounts,
- b) providing, activating, and operating RPC, API, and other Node101 services,
- c) carrying out purchase, subscription, payment, and billing transactions,
- d) verifying user identity and account security,
- e) creating, managing, and securing API access,
- f) monitoring the use, performance, and availability of the Services,
- g) ensuring system, network, and information security; preventing and detecting unauthorized access, misuse, fraud, and security breaches,
- h) providing technical support, maintenance, and customer services,
- i) receiving, evaluating, and resolving user requests and complaints,
- j) improving the Services, measuring their performance, and improving operational processes,
- k) carrying out accounting, finance, billing, and tax processes,



- l) fulfilling contractual obligations and managing contractual relationships,
- m) fulfilling legal obligations and responding to lawful requests from authorized public institutions and organizations,
- n) conducting legal disputes, protecting our Company's rights and interests, and asserting or defending legal claims where necessary,
- o) creating and retaining records required to be kept under legislation.

4. LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

Your personal data is processed based on the applicable personal data processing conditions set forth in Article 5 of the KVKK.

In this context, your personal data may be processed based on the following legal grounds:

Being directly related to the establishment or performance of a contract: for the purposes of creating a user account, carrying out order and subscription transactions, providing RPC/API Services, conducting payment processes, and providing technical support;

Being mandatory for the data controller to fulfill its legal obligation: for the purposes of fulfilling record-keeping, retention, and notification obligations arising from tax, accounting, electronic commerce, and other legislation;

Data processing being mandatory for the establishment, exercise, or protection of a right: for the purposes of managing requests and complaints, conducting legal disputes, and protecting our Company's legal rights;

Data processing being mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject: for the purposes of ensuring the security of the Services, preventing misuse, keeping system and access records, monitoring the performance of the Services, and improving operational processes.

Node101 does not request separate explicit consent where the processing of personal data may be based on one of the legal grounds above. If there is a separate data processing activity that must be based on explicit consent, consent is obtained separately and expressly from the relevant person.

5. TRANSFER OF PERSONAL DATA

Your personal data may be transferred in accordance with the conditions specified in Articles 8 and, to the extent applicable, 9 of the KVKK, and limited to the extent required by the transfer, to:

- a) banks and payment service providers for the purpose of carrying out payment transactions,



- b) information technology, hosting, cloud, and infrastructure service providers from whom services are received for the purpose of operating and hosting the Site and the Services, ensuring their security, and maintaining the technical infrastructure,
- c) relevant service providers for the purpose of fulfilling accounting, tax, and legislation-based obligations, and
- d) legally authorized public institutions and organizations, courts, enforcement offices, and other competent authorities for the purpose of fulfilling legal obligations or responding to legal requests.

Node101 does not sell personal data to third parties for advertising, marketing, or similar purposes, and does not transfer personal data to third parties for such purposes.

If personal data is transferred abroad, the relevant transfer is carried out in accordance with the conditions and safeguards set forth in Article 9 of the KVKK.

6. METHOD OF COLLECTING PERSONAL DATA

Your personal data may be collected electronically by automatic or partially automatic means through:

- your creation of an account on the Site,
- your carrying out an order or subscription transaction,
- your use of the Services or the RPC/API infrastructure,
- the carrying out of payment and billing transactions,
- your contacting Node101 or creating a support request,
- the automatic generation of technical and security records during use of the Site and the Services.

Where required by legislation or where legal processes are conducted, your personal data may also be obtained through other physical or electronic channels.

7. RETENTION OF PERSONAL DATA

Your personal data is retained for the period necessary for the purpose for which it is processed and taking into account the legal retention periods prescribed under the relevant legislation.

If the purpose of processing ceases to exist and there is no other legal ground requiring the retention of personal data under the relevant legislation, personal data is deleted, destroyed, or anonymized in accordance with the KVKK and the relevant legislation.

8. DATA SECURITY



Node101 takes the necessary technical and administrative measures proportionate to the nature of the processed data and the relevant risks in order to prevent unlawful processing of and access to personal data and to ensure that personal data is stored securely.

9. RIGHTS OF THE DATA SUBJECT UNDER THE KVKK

Pursuant to Article 11 of the KVKK, you have the following rights regarding your personal data:

- a) to learn whether your personal data is being processed,
- b) to request information if your personal data has been processed,
- c) to learn the purpose of processing your personal data and whether it is being used in accordance with that purpose,
- d) to know the third parties to whom your personal data has been transferred domestically or abroad,
- e) to request correction if your personal data has been processed incompletely or inaccurately,
- f) to request deletion or destruction of your personal data within the framework of the conditions set forth in the KVKK,
- g) to request that correction, deletion, or destruction operations be notified to third parties to whom your personal data has been transferred,
- h) to object to any result against you arising from the analysis of processed data exclusively through automated systems, and
- i) to request compensation for damages if you suffer damage due to unlawful processing of your personal data.

10. APPLICATION

You may submit your requests under Article 11 of the KVKK, pursuant to Article 13 of the KVKK and the Communiqué on the Procedures and Principles for Application to the Data Controller, using one of the methods prescribed under the legislation, to the following addresses:

Node101 Teknoloji Anonim Şirketi

Address: Levent Mah. Karanfil Sok. No:13 Beşiktaş / İstanbul

Email: sales@node101.io



Applications are concluded as soon as possible depending on the nature of the request and, in any event, within the period prescribed under the legislation.

11. EFFECTIVE DATE AND UPDATES

This Privacy Notice entered into force on 17.08.2026.

Node101 may update this Privacy Notice in line with changes that may occur in personal data processing activities or the relevant legislation. The current text is made available through the Site.

