

PRIVACY POLICY

v.1.2 – 03.06.2025

Introduction

This Privacy Policy has been prepared to explain how personal data collected through services provided on the website and integrated systems (such as the mobile application, MOSS system, and location-based solutions) operated by Delmar Safety is collected, processed, stored, transferred, and protected under relevant legislation, including the Personal Data Protection Law No. 6698 ("KVKK") in Turkey, the General Data Protection Regulation No. 2016/679 ("GDPR") in the European Union and its associated Standard Contractual Clauses ("SCC"), and in the United States, federal regulations as well as state-level data protection laws such as the California Consumer Privacy Act ("CCPA"), California Privacy Rights Act ("CPRA"), and Virginia Consumer Data Protection Act ("VCDPA").

Delmar Safety commits to full compliance with data protection regulations in all countries and regions in which it operates and to processing personal data in accordance with the respective legal systems. The processes of collecting, using, storing, sharing, transferring, and deleting personal data are carried out in compliance with applicable laws such as the KVKK in Turkey, GDPR in the European Union, and the CCPA, CPRA, and VCDPA in the United States.

For users located in the EU and the USA, digital consent and preference management systems are effectively used in accordance with local legislation. User interfaces that allow for the collection of explicit consent and management of preferences have been implemented.

Various mechanisms such as cookie management panels, data sharing preference screens, marketing consent checkboxes, clear statements like "your personal data is not being sold," and detailed preferences regarding data processing categories provide users with a transparent and controllable experience. These preferences are fully respected and securely recorded and stored for audit purposes. This ensures full compliance with GDPR, CCPA, CPRA, and VCDPA.

By using this website and its integrated services, the user is deemed to have accepted the terms of this Privacy Policy.

Data Controller

The data controller responsible for processing your personal data is:

- **Title:** Del-Mar Denizde Guvenlik Sist. Tas. San. Ve Tic. Ltd. Sti.
- **Address:** Tepeoren Mah. ITOSB 14. Cad. No:8 Tuzla Istanbul Turkiye
- **Email:** info@delmarsafety.com
- **KEP Address:** delmarguvenlik@hs01.kep.tr
- **Phone:** +90 216 4944690
- **Website:** <https://delmarsafety.com>

Collected Personal Data

The main types of personal data that may be processed within our services include:

- **Identity Information:** (Not directly requested but may be indirectly obtained via integrated systems: full name, user ID, etc.)
- **Contact Information:** Email, phone number (only via system integrations)
- **Location Data:** Precise (GPS-based) and/or approximate
 - **Precise Location:** Geographic location with meter-level accuracy from the user's device GPS
 - **Approximate Location:** Based on IP address, Wi-Fi, or cell tower data
- **Internet Access Data:** IP address, session data, browser type, operating system, device info
- **Cookie Data:** Cookie identifiers and usage preferences
- **Service Usage Information:** Visit history, transaction logs, connection durations and preferences

Purposes of Processing Personal Data

Your collected personal data may be processed for the following purposes:

- Ensuring the operation of the website and application
- Delivering, customizing, and improving services
- Enhancing user experience
- Providing location-based services
- Statistical and reporting activities
- Responding to user requests
- Security and fraud prevention
- Fulfilling legal obligations

Legal Grounds for Processing Personal Data

Your personal data may be processed based on the following legal grounds:

- Explicit consent
- Necessity for the establishment or performance of a contract

- Necessity for the establishment, exercise, or defense of legal claims
- Compliance with a legal obligation
- Legitimate interests

User Base and Application Distribution Scope

User Limitation

The application is developed exclusively for use by users affiliated with Delmar Safety.

Target User Profile

The application is designed for use by specific and limited companies:

- **Delmar Safety Inc.**
8723 Easthaven Blvd Unit A Houston, TX 77075 USA
- **Delmar Safety BV**
Albert Plesmanweg 95–97 3088 GC Rotterdam / The Netherlands
- **Delmar Marine Services**
36 Toh Guan Road East #01-39 Enterprise Hub Singapore, 608580

Can any company become a customer? No.

Public Features

The application is designed exclusively for corporate users affiliated with Delmar Safety and contains no public-facing features.

Transfer of Personal Data

Your personal data may be transferred, for the purposes outlined above, to:

- Domestic or international hosting, software, or infrastructure providers
- Our business partners and affiliates
- Authorized public institutions and organizations
- Courts and official authorities

All transfers are conducted with necessary safeguards and in accordance with national and international legal requirements.

Transfer of Data Abroad

Your data may be transferred abroad due to server services located outside the country or technical requirements of integrated systems. In such cases, necessary security measures are taken, and where explicit consent is not obtained, transfers are conducted under legal conditions.

Use of Cookies

This website uses cookies to enhance the user experience and improve service quality. Cookies are small text files placed on your device when you visit a website.

Cookies allow the website to:

- Remember your preferences
- Store your login information
- Collect statistics
- Provide better content

You can control cookies through browser settings—delete or block them. However, this may impair the functionality of some website features.

Consent systems (cookie preferences, data sharing panels) are active for all users including those in Turkey, the EU, and the USA. Preferences based on explicit user consent are systematically recorded and legally stored.

Use of Location Data

Delmar Safety may collect and process both precise (GPS) and approximate location data through the mobile application or website. These data are used solely when necessary for providing services and are not shared with third parties.

Location data collection and processing are essential for core functionalities, including tracking field operations, offering location-based services, and ensuring accurate data flow in the MOSS system.

Location data is collected continuously while the app is active. Data is stored up to 2 years after employment termination and securely deleted afterward.

For iOS devices, location data is collected only with explicit consent under AppTrackingTransparency (ATT). No tracking or processing occurs without consent.

International Data Transfer and Compliance with Local Regulations

Delmar Safety is committed to protecting personal data of users in all regions it serves. In cases where international transfers are necessary, all operations comply with local and international data protection laws.

Transfers may be made between Turkey, EU countries (e.g., the Netherlands and Spain), and the USA. These transfers are protected by contractual obligations, technical and administrative safeguards, and legal approvals.

In particular:

- In **Turkey**, personal data is processed under the KVKK.
- In the **EU**, data is processed under GDPR Articles 6 and 44–49, with mechanisms like SCC where applicable.
- In the **USA**, since there is no federal data law, state laws (e.g., CCPA, CPRA, VCDPA) are followed in relevant jurisdictions.

If there is no data protection equivalence between countries, either explicit consent is obtained or approved safeguards are applied.

Rights of the Data Subject

You have the right to:

- Learn whether your data is processed
- Request information on processed data
- Learn the purpose and usage of processing
- Learn to whom your data is transferred (domestically or abroad)
- Request correction of incomplete or incorrect data
- Request deletion or destruction of data
- Object to processing based solely on automated systems that produce negative outcomes
- Claim compensation for damages if incurred

To exercise these rights, you may contact:

- **Email:** info@delmarsafety.com
- **KEP Address:** delmarguvenlik@hs01.kep.tr

Contact Person Pursuant to KVKK

For requests related to personal data processing:

- **Name:** Kayhan AYTUG
- **Email:** kayhan@delmarsafety.com

Security Measures

Delmar Safety commits to protecting your personal data against unauthorized access, loss, misuse, unlawful access, or disclosure by implementing necessary technical and administrative safeguards.

Limitation of Liability

Delmar Safety is not liable for direct or indirect damages arising from access to the website or use of its content due to breach of contract, tort, or other causes.

We also disclaim responsibility for issues like operational disruptions, errors, viruses, data loss, or unauthorized access arising from this or linked sites.

By using the site, users agree to indemnify Del-Mar Denizde Guvenlik Sist. Tas. San. Ve Tic. Ltd. Sti. from all claims, lawsuits, or expenses (including legal costs).

Third-Party Links

This website may contain links to third-party sites. Delmar Safety is not responsible for the content or privacy practices of such sites. Users access them at their own risk.

Right to Modify the Privacy Policy

Delmar Safety reserves the right to modify services, products, content, or terms without prior notice. Changes become effective once published on the website. Continued use implies acceptance.

Reserved Provisions

All content on the website is for informational purposes as of the date of publication. Accuracy, completeness, and up-to-dateness are not guaranteed. Delmar Safety makes no representations or warranties, express or implied, regarding the fitness or performance of such content.

We are not liable for damages arising from contract breach, tort, technical malfunction, communication issues, malware, data loss, or unauthorized access.

Dispute Resolution

This Privacy Policy is governed by Turkish law. Istanbul Çağlayan Courts and Enforcement Offices shall have jurisdiction over all disputes.

Contact

For questions or requests related to the processing of your personal data:

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Effective Date and Last Update

This Privacy Policy is effective as of the date of publication. Delmar Safety reserves the right to make changes as needed. All updates take effect upon publication.

Effective Date: 03.06.2025

Last Updated: 03.06.2025