

CELAS STUDIO™ Murat AYAZ · sole proprietorship	PROTECTION OF PERSONAL DATA GENERAL PRIVACY NOTICE	DOCUMENT NO	CS-KVKK-01
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Protection of Personal Data General Privacy Notice

Issued under Article 10 of Law no. 6698 on the Protection of Personal Data and the Communiqué on the Procedures and Principles to be Followed in Fulfilling the Obligation to Inform.

Privacy Notice on the Protection of Personal Data, version 1.0 · In force from: 25.08.2026

This English text is a courtesy translation. The Turkish version (CS-KVKK-01) is the one that governs, and in any discrepancy the Turkish wording prevails.

1. IDENTITY OF THE DATA CONTROLLER

Under Law no. 6698 on the Protection of Personal Data (the "Law"), the data controller is Murat AYAZ. Murat AYAZ is a natural person, not a company, a partnership or a legal entity, and operates from Türkiye.

- **Product:** the Celas Studio™ desktop application
- **Websites and services:** the celas.studio marketing site, the documentation, the blog, the forum, the Celas Artwall community gallery and the newsletter
- **Electronic contact address and channel for applications:** support@celas.studio
- **Application form:** celas.studio/kvkk-request. Applications under Article 11 are received through this form, which is the software developed for the purpose of the application within the meaning of the Communiqué on the Procedures and Principles of Application to the Data Controller. It is open to everyone, including visitors with no account.

VERBIS. The obligation to register with the Data Controllers' Registry has been assessed against the exemption criteria set by decision no. 2018/32 of the Personal Data Protection Board and by decision no. 2023/1154 amending it. As a data controller with fewer than 50 employees a year, an annual balance sheet total below 100 million TRY, and no principal activity consisting of the processing of special categories of personal data, we are not required to register. This notice will be updated if that changes.

2. PERSONAL DATA PROCESSED, SURFACE BY SURFACE

a) Site visits and cookies

The data held in strictly necessary, functional and (where you accept them) analytics cookies; the record of your cookie choice (the choice itself, the date and time, the IP address and, where there is one, the account and session identifier); and, where analytics have been accepted, the persistent identifier Google Analytics assigns to your browser together with your IP address. Details are in the Cookie Policy.

b) Account

Name, handle, e-mail address, a hash of your password (the password itself is stored nowhere), role, profile picture, cover image, biography, location if you enter one, badges, registration date, last sign-in time and e-mail verification time; and the record of your agreement (the time you accepted the Terms of Use and the Privacy Notice, your marketing consent, the IP address and browser details).

c) Security and abuse records

Failed sign-in attempts (IP address, the e-mail tried, the time), API rate-limiting records (IP address, endpoint, time) and "remember me" tokens (a random reference, a hash of the token and its expiry).

d) Forum

The topics you open and the posts you write, edit times and view counters; the identity of your account when you report a post; and content that passes through automatic pre-moderation. The system screens every topic and post against a banned-word list before it appears. Where there is a match, the post is held until a person approves it, and the matching word together with an extract of at most 400 characters from your text is kept against your account. It also covers moderator warnings, including the identity of the moderator who issued them, and any forum ban. These decisions are not made by software: every held post is reviewed by a person, and you can appeal the outcome of the automatic screening.

e) Celas Artwall

The images and videos you upload and their previews, titles, descriptions and tags; likes, saves, follows and comments; view counts; notification records, meaning which user liked or commented on which user's work and when; the identity of your account when you report a work (reports are closed to other users but are not anonymous to the moderator, who sees the reporting account in the moderation queue); and the outcome of moderation, as a removal flag.

f) Contact form

Your name, e-mail address, subject, the full text of your message, the language you wrote in and your IP address.

g) Newsletter

Your e-mail address, your preferred language, the time of your consent and its verification, your unsubscribe key and any feedback you leave on the way out.

h) Licence and desktop application

Licence records tied to your account: licence key, application, purchase channel (Steam, Microsoft Store or Mac App Store), seat count, status including whether it was refunded, and purchase date. Device access tokens: device name, a hash of the token, last use, last IP address used, validity and revocation. The application checks for updates at start-up, and that request leaves the installation's IP address on our server.

i) Crash reports, with your explicit consent only

Application version and build number, operating system and version, processor architecture, the reason for the crash, the fault address, the full stack trace, document context (technical counters such as layer and frame count and the active tool; no file name, file path or drawing content is sent), a persistent random identifier unique to the installation (client_id) and your IP address. If you are signed in to the application when a report is sent, the report is tied to your account and is additionally flagged as coming from an authenticated user. These reports are not anonymous.

j) Traffic records (Law no. 5651)

When you submit content to the forum or to Artwall, your connection IP address and the timestamp are kept in our capacity as a hosting provider under Article 5/3 of Law no. 5651 and the related Regulation. Nothing else about the request is kept: no user agent, no referrer and no copy of what was sent, since the obligation does not extend to them.

k) Aggregate statistics

Daily visit, registration, download, forum post and upload counts are kept as totals only. They cannot be traced to a person and are therefore not personal data.

3. PURPOSES OF PROCESSING AND THE LEGAL GROUND FOR EACH

PURPOSE	WHICH DATA	LEGAL GROUND
Formation and performance of the membership agreement; opening your account, signing in, e-mail verification, password reset	Account data, session and "remember me" tokens	Art. 5/2-c, directly related to the formation or performance of a contract
Verifying the licence, giving access to the product you bought, authorising devices	Licence records, device tokens	Art. 5/2-c

Answering your support request	Contact form data, account data	Art. 5/2-c for an existing user; Art. 5/2-f for a sender who is not a user
Publishing your content on the forum and on Artwall; likes, follows and comments	Forum and Artwall data	Art. 5/2-c; for publicly posted content also Art. 5/2-d, data made public by the data subject
Using the works you publish on Artwall to promote Celas Studio and Artwall, including on social media accounts and in advertising	The work you published, its title and your username	Art. 5/2-c, the permission you give in the Membership Agreement; for the work itself also Art. 5/2-d, data made public by the data subject
Preventing abuse, blocking spam and attacks, rate limiting, account security	Sign-in attempts, IP addresses, API request records	Art. 5/2-f, legitimate interest. Our legitimate interest is protecting the service and user accounts
Content moderation; banned-word screening, human review, assessment of reports, warnings and bans	Forum and Artwall content, moderation flags and stored extracts, the reporter's identity, warnings	Art. 5/2-f, legitimate interest: protecting the community and third parties from unlawful and harmful content
Meeting legal obligations; answering requests from competent authorities, hosting provider duties	The relevant records, traffic information	Art. 5/2-c (expressly provided for by law) and the fulfilment of a legal obligation
Establishing, exercising or protecting a right, in the event of a dispute	The relevant records, consent records	Art. 5/2-e
Measuring use of the site (analytics cookies)	Analytics cookie data, IP address	Explicit consent, Art. 5/1
Sending the newsletter and product announcements	E-mail address, language, consent record	Explicit consent, Art. 5/1; and prior consent plus registration with the Message Management System under Art. 6 of Law no. 6563
Fixing product defects using crash reports and diagnostic data	Section 2(i)	Explicit consent, Art. 5/1

Processing that rests on explicit consent. Analytics cookies, the newsletter and crash reports are processed only with your explicit consent. Withholding that consent, or withdrawing it later, does not shut you out of any part of the service: no feature of the application depends on your turning diagnostics on. You can withdraw consent at any time from the cookie settings, from the settings screen in the application, or from the unsubscribe link at the foot of every newsletter. Withdrawal takes effect for the future and does not make the processing carried out until then unlawful.

Automated decision-making. No decision is taken about you solely by automated analysis that produces legal effects concerning you or similarly significantly affects you. The banned-word screening on the forum is automatic, but it only holds a post temporarily; the decision to publish or reject is always taken by a person.

4. HOW PERSONAL DATA IS COLLECTED

Data is collected wholly or partly by automated means: from what you enter directly into the site and the application (registration, sign-in, profile, forum, Artwall, contact form, newsletter), from what your browser and the application send automatically (cookies, server logs, IP address, device tokens and, subject to your explicit consent, crash reports), and from the licence information that reaches us through the purchase channel.

5. TRANSFERS

Your data is transferred to the recipient groups below, limited to the purposes listed. Your personal data is not sold, and it is not passed to third parties for advertising.

RECIPIENT	WHAT IS TRANSFERRED	WHY	LOCATION
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Hosting provider, GNET İnternet Telekomünikasyon A.Ş. (Güzel Hosting, guzel.net.tr)	All data held on the server, in the capacity of data processor	Hosting the site and the database	The provider is established in Türkiye; the servers are in France
E-mail delivery, carried out by the mail service of the hosting provider above rather than by a separate provider	Your e-mail address and the content of the message sent	Sending verification, password reset, notification and newsletter e-mails	The same as the hosting provider
Google Ireland Ltd. / Google LLC	Analytics cookie identifier, IP address, pages visited	Measuring use of the site, with your explicit consent only	Outside Türkiye and the EEA
YouTube (Google) and Vimeo	Your IP address and the page you are on, only if you open a page carrying an embedded video	Playing the video	Outside Türkiye
Google Fonts	Your IP address	Loading the typeface	Outside Türkiye
Valve (Steam), Microsoft (Microsoft Store), Apple (Mac App Store)	Purchase and refund status reaches us from them	Verifying the licence	Outside Türkiye
Social media platforms (Meta, X, YouTube and the like)	Only where a work is used in promotion: the work you published, its title and your username	Promoting Celas Studio and Artwall	Outside Türkiye
Competent public authorities	The records requested	Legal obligation	Türkiye

Transfers abroad. The servers are in France, so the whole of the data held on them is stored outside Türkiye. That is the largest of the transfers in the table above, not a marginal one, and it is named here rather than left to be inferred from a row. The transfers shown as being outside Türkiye are made under Article 9 of the Law as amended by Law no. 7499. As the Board has not published an adequacy decision, each transfer rests on a standard contract or on one of the other appropriate safeguards provided for in the Law, and is notified to the Board within five business days of the standard contract being signed. You can ask for a copy of these safeguards by writing to support@celas.studio.

6. RETENTION PERIODS

Under Article 7 of the Law and the Regulation on the Deletion, Destruction or Anonymisation of Personal Data, data whose purpose of processing has fallen away is deleted, destroyed or anonymised. Periodic destruction is carried out every six months. The periods are:

DATA	PERIOD
Account data	For as long as the account is open; after deletion of the account, at the latest in the next periodic destruction cycle (6 months at most)
Session cookie	When the browser closes
"Remember me" token	30 days; immediately on sign-out
Cookie consent record	The consent is valid for 1 year; kept for a further year after it expires, as evidence
Agreement consent record (Terms of Use / Privacy)	For the life of the account and for 10 years after it closes (the general limitation period)
Sign-in attempts and API rate-limiting records	90 days
Contact form messages	2 years

Newsletter subscription	Until you unsubscribe. The consent record is kept for 1 year from the date the consent ceases to be valid, under Art. 13 of the Regulation to Law no. 6563
Forum topics and posts	Until you delete them or close your account (see the note below)
Hidden or removed forum content	1 year from removal, then permanently deleted
Moderation flags and stored text extracts	1 year from the decision
Moderator warnings	2 years
Artwall works	Until you delete them or close your account. Deleting a work, or your account, takes the record and the files at the same moment. The record of a work taken down in moderation is kept for 1 year from the decision, so that you can appeal it
Reports of works	1 year from the decision
Licence records	For as long as the licence is valid and for 10 years after it ends (commercial and tax legislation)
Device access tokens	On expiry or revocation; at the latest 90 days after revocation
Crash reports	12 months
Traffic records under Law no. 5651	1 year
Backups	Records deleted from the live system remain in backups for at most a further 30 days and disappear when the backup is rotated

What deleting an account actually does, plainly. When you delete your account, your profile, your e-mail address, your password hash, your Artwall works and your comments are deleted. However:

- Your forum topics and posts are not deleted. Their authorship is cleared and they remain as content without an author. We do this so that the posts of the other people in a conversation do not become meaningless. If you want a particular post deleted as well, write to support@celas.studio.
- Crash reports you sent earlier are not deleted. The link to the account is broken and the report remains as a technical record unconnected to you.
- Your licence is tied to the account. Deleting the account deletes the licence record too, and the desktop application falls back to an unlicensed state. If you want to carry on using the product you bought, write to support@celas.studio before deleting the account; you will also be reminded of this outcome before a deletion request is carried out.

7. YOUR RIGHTS (ARTICLE 11 OF THE LAW)

By applying to the data controller you have the right to:

1. learn whether your personal data is being processed;
2. request information about it if it has been processed;
3. learn the purpose of the processing and whether the data is used in line with that purpose;
4. know the third parties, in Türkiye or abroad, to whom your data has been transferred;
5. request correction where the data has been processed incompletely or incorrectly;
6. request deletion or destruction within the conditions of Article 7 of the Law;
7. request that any correction, deletion or destruction be notified to the third parties to whom your data was transferred;
8. object to a result reached against you by analysis carried out solely by automated systems;
9. claim compensation if you suffer loss because of unlawful processing.

You may also withdraw your consent at any time for processing that rests on explicit consent.

8. HOW TO APPLY AND HOW LONG WE TAKE

To exercise your rights, write to support@celas.studio from the e-mail address registered in our system. Where an application does not come from your registered address, we may need to verify your identity. If you have no account, or would rather not use e-mail at all, the application form at celas.studio/kvkk-request is open to everyone and asks for exactly what the Communique requires.

Under the Communique on the Procedures and Principles of Application to the Data Controller, your application must contain:

- your name and surname, and your signature if the application is in writing;
- your Turkish identity number, or for foreign nationals your nationality, passport number or identity number where there is one;
- your residential or business address for service of notice;
- your e-mail address, telephone and fax number for notification, where there are any;
- the subject of your request;
- any information and documents relating to the subject.

Your application is concluded free of charge within thirty days at the latest of reaching us. Where the process requires an additional cost, the fee in the tariff set by the Board may be charged.

Complaint to the Board. If your application is refused, if you find the answer inadequate, or if no answer is given in time, you may complain to the Personal Data Protection Board within thirty days of learning the answer and in any event within sixty days of the date of your application (Article 14 of the Law). The routes for applying to the Board are set out at kvkk.gov.tr.

9. DATA SECURITY AND BREACH NOTIFICATION

The technical and administrative measures we take under Article 12 of the Law:

- All traffic between the site and the application and our server is encrypted with TLS.
- Passwords are stored as irreversible hashes (bcrypt); the password itself exists nowhere.
- "Remember me" tokens are held on the server as hashes only and are renewed on every use.
- Forms are protected against cross-site request forgery with tokens; sign-in attempts and API requests are rate limited.
- Access to the administration interface and to the database rests with the data controller alone; no one else has been given an account.
- The database is backed up regularly.

We hold no independent certification (ISO 27001, SOC 2 or similar) and we do not claim to commission regular penetration testing. We say so plainly so as not to suggest an assurance we do not have.

If we learn that personal data has been obtained unlawfully by others, we notify the Personal Data Protection Board as soon as possible and in any event within 72 hours of learning of it (under Board decision no. 2019/271 of 24.01.2019), and the people concerned within the shortest reasonable time.

10. CHILDREN

You must be at least 16 to open an account, to post content on the forum and on Artwall, and to subscribe to the newsletter. Where the European Union member state you are in has set a lower age for information society services, that age applies, provided it is not below 13. If we find an account belonging to someone under that age we close the account and delete the data. You can report such an account to support@celas.studio.

11. CHANGES TO THIS NOTICE

When this notice changes, the version number and the date it takes effect at the top are updated. Users with an account are notified by e-mail of any substantial change. If the scope of processing that rests on explicit consent widens, your

consent is taken again.