

CELAS STUDIO™ Murat AYAZ · sole proprietorship	PROTECTION, RETENTION AND DISPOSAL OF PERSONAL DATA POLICY	DOCUMENT NO	CS-KVKK-02
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Policy on the Protection, Retention and Disposal of Personal Data

Issued under Law no. 6698 and the Regulation on the Deletion, Destruction or Anonymisation of Personal Data.

This English text is a courtesy translation. The Turkish version (CS-KVKK-02) is the one that governs, and in any discrepancy the Turkish wording prevails.

1. PURPOSE AND SCOPE

This Policy sets out the procedures and principles for retaining and disposing of the personal data processed in the Celas Studio™ activities carried on by the data controller, Murat AYAZ. It is drawn up under Law no. 6698 on the Protection of Personal Data and the Regulation on the Deletion, Destruction or Anonymisation of Personal Data.

The Policy covers all personal data processed through the celas.studio marketing site, the documentation, the blog, the forum, the Celas Artwall community gallery, the newsletter, the contact form and the Celas Studio desktop application.

It covers visitors, members, customers, forum and Artwall users, newsletter subscribers and anyone who applies through the contact form.

2. DEFINITIONS

TERM	MEANING
Law	Law no. 6698 on the Protection of Personal Data
Regulation	Regulation on the Deletion, Destruction or Anonymisation of Personal Data
Data controller	Murat AYAZ
Data subject	The natural person whose personal data is processed
Deletion	Rendering the data in no way accessible or reusable by the relevant users
Destruction	Rendering the data in no way accessible, recoverable or reusable by anyone
Anonymisation	Rendering the data incapable of being associated with an identified or identifiable natural person under any circumstances, even when matched with other data
Periodic destruction	Deleting, destroying or anonymising data whose retention period has expired, on the controller's own initiative and at the intervals set out in this Policy

3. PROCESSING

Personal data is processed in line with the principles listed in Article 4 of the Law: lawfully and fairly, accurately and where necessary kept up to date, for specified, explicit and legitimate purposes, and in a way that is relevant to, limited to and proportionate with the purpose of processing.

The purposes of processing and the legal ground for each are set out surface by surface in a separate document, the General Privacy Notice on the Protection of Personal Data (CS-KVKK-01). Where this Policy and the Privacy Notice conflict, the provision more favourable to the data subject applies.

4. RETENTION AND DISPOSAL

Grounds that require retention. The formation and performance of a contract, the establishment and protection of a right, retention obligations provided for in legislation (in particular traffic records under Law no. 5651 and documents under tax legislation) and the legitimate interests of the data controller.

Grounds that require disposal. The ground requiring retention falling away, the withdrawal of explicit consent, a request by the data subject being accepted, the expiry of the retention period, or a finding that the data has been processed unlawfully.

Disposal on request. On an application by the data subject, the data concerned is deleted, destroyed or anonymised within thirty days at the latest, and the outcome is notified to the data subject. Where the data has been transferred to third parties, the disposal request is notified to them as well.

5. TRANSFER OF PERSONAL DATA

Personal data is transferred only to the extent necessary to provide the service, and to the following recipient groups: the hosting provider, the e-mail delivery infrastructure, the payment and distribution platforms (Steam, Microsoft Store, Mac App Store), the measurement provider (only where cookie consent has been given) and, on request, competent public authorities.

Transfers abroad are made under Article 9 of the Law, resting on whichever is appropriate of an adequacy decision, a standard contract, binding corporate rules or an undertaking. Where a standard contract is relied on, the Authority is notified within five business days of signature.

6. THE OBLIGATION TO INFORM

Data subjects are informed under Article 10 of the Law at the time their personal data is obtained. This is done through the General Privacy Notice published at celas.studio/kvkk, through the short notices placed beside the relevant forms, and through the corresponding screens in the desktop application.

7. TECHNICAL AND ADMINISTRATIVE MEASURES

Technical. HTTPS on every connection; passwords stored as hashes only (bcrypt); session cookies protected with HttpOnly and SameSite; access to the administration panel limited to authorised accounts; database access made through prepared statements and user input escaped on output; uploaded files re-encoded and stored under random names, with script execution turned off in the upload directory; regular backups.

Administrative. Access to data limited to what the task requires; the administrator account protected with multi-step verification; data processing terms put in writing with the providers used; notification to the Authority as soon as possible and within seventy-two hours at the latest in the event of a breach, and to the data subject within the shortest reasonable time.

8. TECHNIQUES FOR DISPOSING OF PERSONAL DATA

MEDIUM	TECHNIQUE
Database records	Deleting the row concerned; clearing the identity field in linked records so the association is broken
Uploaded files (images, video, attachments)	Deleting the file from the server; backups overwritten at the end of the rotation period
Log and traffic records	Automatic deletion once the retention period expires
Data that becomes statistics	Anonymisation by breaking the link to identity
Paper	Destruction in a document shredder, irreversibly

9. RETENTION AND DISPOSAL PERIODS

DATA	RETENTION PERIOD	AT THE END
Membership account (name, e-mail, password hash)	For as long as the account is open; 30 days after a closure request	Deletion
Device access keys	For as long as the key is valid; 90 days after revocation or expiry	Deletion
Licence records	10 years, under tax legislation	Deletion
Forum posts	For as long as they remain published. Closing an account does not delete the post; its authorship is cleared	Anonymisation
Artwall works and files	For as long as they remain published; at the same moment if the user deletes them	Deletion
Complaint and moderation records	1 year from the decision	Deletion
Traffic records (Law no. 5651)	1 year	Deletion
Crash reports	12 months	Anonymisation
Contact form messages	2 years	Deletion
Newsletter subscription and consent records	For as long as the subscription lasts; the consent record for 3 years after leaving	Deletion
Cookie consent records	3 years	Deletion
Application and response correspondence	3 years	Deletion

Where legislation provides for a longer period, the statutory period applies.

10. PERIODIC DESTRUCTION INTERVAL

Periodic destruction is carried out every six months, in June and December. The date, scope and outcome of the process are recorded, and those records are kept for at least three years.

11. PUBLICATION AND RETENTION OF THE POLICY

The Policy is published electronically at celas.studio/legal, where the current version is kept. Earlier versions are retained by the data controller so that they can be produced if needed.

12. REVIEW INTERVAL

The Policy is reviewed at least once a year, and is updated without waiting for that review where legislation or processing activities change.

13. ENTRY INTO FORCE

This Policy takes effect on the issue date shown above. If it is repealed, the earlier copies are cancelled and retained by the data controller.