

## KVKK & Standard Contractual Clauses (SCC) Position

Effective starting: September 24, 2025

**Purpose:** Compliance positioning for customers subject to KVKK (Law No. 6698) and cross-border data transfer requirements

---

### 1. Purpose and Scope

This document outlines how **ProcessMind** positions itself with respect to:

- The **Turkish Personal Data Protection Law (KVKK – Law No. 6698)**
- **EU Standard Contractual Clauses (SCCs)** for cross-border data transfers

It is intended to support customer compliance assessments, procurement processes, and regulatory discussions, particularly in regulated industries such as banking and financial services.

---

### 2. Roles and Responsibilities under KVKK

In a typical deployment:

- **Customer** acts as the **Data Controller** under KVKK
- **ProcessMind** acts as the **Data Processor**

ProcessMind processes personal data **solely on documented customer instructions** and does not determine the purposes or means of processing. Details on our processing activities are set out in our [Data Processing Addendum](#).

This role allocation aligns with KVKK Articles 3, 10, and 12, and mirrors the processor obligations under GDPR Article 28.

---

### 3. Alignment with KVKK Principles

KVKK is largely aligned with GDPR in terms of its core data protection principles. ProcessMind is designed in accordance with these principles, including:

- **Lawfulness and purpose limitation**
- **Data minimization and proportionality**
- **Accuracy and retention limitation**
- **Confidentiality and security of processing**

ProcessMind does not require directly identifiable personal data to deliver process mining insights. Customers retain full control over which data attributes are ingested, masked, pseudonymized, or excluded.

---

#### **4. Technical and Organizational Measures (TOMs)**

ProcessMind implements appropriate technical and organizational measures to protect personal data, including but not limited to:

- Encryption of data in transit and at rest
- Role-based access control and least-privilege principles
- Audit logging and traceability of access
- Secure tenant isolation
- Configurable data retention and deletion mechanisms

These measures are designed to support compliance with KVKK Article 12 and SCC security requirements. For more details, see our [Privacy Policy](#) and [security measures documentation](#).

---

#### **5. Sensitive Data and Regulated Environments**

ProcessMind is suitable for use in regulated environments, including banking, where event logs may contain employee or customer-related identifiers.

The platform supports:

- Pseudonymized identifiers in event logs
- Attribute-level data exclusion or masking
- Customer-controlled ingestion pipelines

Customers remain responsible for ensuring a lawful processing basis and for determining whether explicit consent or other legal grounds apply under KVKK.

---

## 6. Cross-Border Data Transfers & SCCs

Where personal data is transferred outside Turkey or the EU, **ProcessMind supports the execution of EU Standard Contractual Clauses (SCCs)** as part of its [Data Processing Addendum](#).

Key points:

- SCCs are executed between the **Data Controller** and **ProcessMind as Data Processor**
- SCCs apply only where cross-border transfers occur
- SCCs are supplemented by ProcessMind's technical and organizational safeguards

Upon request, ProcessMind can provide information required to support SCC transfer impact assessments.

---

## 7. Shared Responsibility Model

KVKK compliance is a **shared responsibility**:

- **Customers** are responsible for lawful basis, transparency obligations, and data subject rights
- **ProcessMind** is responsible for secure processing, confidentiality, and adherence to customer instructions

This shared model ensures regulatory clarity and operational accountability.

---

## **8. Conclusion**

ProcessMind positions itself as a **GDPR-first, KVKK-compatible process intelligence platform** that supports regulated customers through:

- Clear processor role definition
- Strong technical and organizational safeguards
- Support for SCC-based cross-border data transfers
- Customer-controlled data governance

ProcessMind does not claim KVKK certification but enables customers to deploy the platform in a KVKK-compliant manner.

For additional information, please review our [Privacy Policy](#) and [Data Processing Addendum](#).

---

## **ProcessMind**

*Integrated Process Intelligence, designed for clarity, security, and trust.*