

Formata

Country Annex — Türkiye

Vendor statement of facts relevant to local requirements

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About this document

This annex supplements the documentation of Formata version 1.6.0 for customers in Türkiye. It sets out the facts about the product that matter under the local rules named below and shows which obligations stay with the customer.

The annex is a statement by the vendor about its product. It is not legal advice, not a certificate of conformity and not a substitute for the customer's own assessment.

1. Purpose and status

No certification or registration by Turkish authorities is claimed for the product or for the vendor in this document.

2. Product facts

Item	Fact
Product and version	Formata 1.6.0
Deployment	Server software installed on the customer's infrastructure
Customer content on vendor servers	No
Interface languages	Shell: English, Russian, German, Spanish, French, Italian, Polish, Portuguese (Brazil), Turkish, Japanese, Korean, Chinese, Arabic and Persian (the last two right-to-left). CRM form labels are kept in a translation dictionary in the same languages; some strings produced by queries and scripts are shown in Russian only.

2.1. Personal data the product can process

- User accounts: login, name, roles, department, password hash, active flag
- Customer contact persons and leads: last name, first name, position, company, email address, phone, notes
- Organisational structure data: positions, assignments, managers, delegations
- Correspondence: messages of connected mailboxes with attachments, messages of the internal messenger
- Details of counterparties in warehouse documents
- Log records: who signed in and when, who opened and saved forms, who changed field values
- Any other information the customer enters in note fields, attachments and its own forms

2.2. Where data is stored

All data is stored in the PostgreSQL database on the customer's server. Attachments are stored in a directory on the server disk (by default `uploads` in the service working directory); mail attachments are stored in the database. The user's browser keeps the access token (until the tab is closed), the queue of unsaved actions made while offline and a cache of the shell files.

2.3. Data sent to the vendor

None.

3. Data protection — KVKK

Law No. 6698 on the Protection of Personal Data (KVKK) applies to the personal data the customer processes with the product. The supervisory authority is the Personal Data Protection Board (Kişisel Verileri Koruma Kurulu).

3.1. Roles

For personal data processed in the product on the customer's own equipment, the customer is the data controller (veri sorumlusu). The vendor has no access to that data and is not a data processor (veri işleyen) for it.

3.2. What the product provides (Article 12)

- **Access control.** Sign-in with a login and password; the server issues a random token that the browser sends in the `Authorization: Bearer` header. After five failed attempts within 15 minutes sign-in for that login is blocked for 10 minutes (configurable). The password of a domain account can be checked by an external identity provider over OpenID Connect. There is no multi-factor authentication. Access control: user roles, a role-to-forms matrix, permissions on individual form controls and table fields, record visibility by owner and organisational structure, sharing of a single record, roles on named queries. External systems use API keys with scopes and a request-rate limit.
- **Logging.** The `sys_audit` database table: sign-in attempts (successful, failed, locked), opening and saving of forms, script runs and errors, access denials, form publication, report exports. The `sys_record_history` table: the old and new value of every changed field for tables placed under observation (by default warehouse documents, their lines, products, warehouses and counterparties). Separate logs are kept for integration API calls, scheduler job runs, background tasks, slow queries and configuration transfers. Service messages go to the system journal (journald). The program sets no retention period for the action log.
- **Export and deletion.** Export: results of named queries and data components as CSV (by a button in the forms that provide one and by a request to the server), records as JSON through the integration API, a full export with standard PostgreSQL tools (`pg_dump`). Deletion: individual records in forms, through the API or by the administrator's SQL queries; attachments are marked deleted and the file is erased once nothing references it; all data by dropping the database and removing the attachment directory. The program has no ready-made procedure for anonymising or erasing all information about one person.
- **Encryption.** See the section on cryptography below.

3.3. What remains with the customer

- the conditions for processing (Articles 5 and 6) and the obligation to inform data subjects (Article 10);
- registration in the data controllers' registry VERBİS where the customer is subject to it (Article 16);
- answering data-subject applications (Articles 11 and 13) with the export and deletion functions above;
- notifying a data breach to the Board within 72 hours;
- for installations on the customer's equipment, the choice of where that equipment is located.

4. Use of artificial intelligence

The product uses large language models as follows. Lead scoring. If the administrator has configured a key for an external artificial-intelligence service, a scheduler job sends that service the fields of unscored leads every 15 minutes (title, company, contact person, e-mail address, telephone, source, budget) and stores the returned score in the lead record. If no key is configured, the score is computed on the customer's server by built-in rules and nothing is sent to an external service.

Content sent to a model provider outside Türkiye that contains personal data is a transfer abroad under Article 9 KVKK. The output of these functions is to be reviewed by a person before it is relied on.

5. Fiscal documents

The product keeps business records. Electronic invoices, archive invoices and ledgers (e-Fatura, e-Arşiv Fatura, e-Defter) are exchanged through the systems of the Revenue Administration (GİB). No integration with these systems and no Turkish fiscal functions are claimed for this version.

6. Accessibility

Public bodies in Türkiye refer to WCAG when buying web-based systems.

Status of the product: No accessibility assessment (WCAG or similar) has been carried out. The interface runs in a browser, scales with browser zoom and supports right-to-left layout for Arabic and Persian; some operations (dragging cards on the board, working in the designer) are designed for a mouse.

No accessibility conformance report is provided for this version.

7. Language

This package is supplied in English. Public tenders under Law No. 4734 are conducted in Turkish, and goods offered to consumers are accompanied by Turkish-language instructions (Law No. 6502). Turkish-language documentation is not part of this package.

Interface languages of the product: Shell: English, Russian, German, Spanish, French, Italian, Polish, Portuguese (Brazil), Turkish, Japanese, Korean, Chinese, Arabic and Persian (the last two right-to-left). CRM form labels are kept in a translation dictionary in the same languages; some strings produced by queries and scripts are shown in Russian only.

8. Documents usually requested and where to find them

Usually requested	Where it is
Product description, functional specification	Product Description and Functional Specification
Installation and operating instructions	Installation and Administration Guide
User manual	User Guide
Maintenance and support description	Software Lifecycle, Maintenance and Support. Service levels: contract
List of third-party and open-source components	Delivery Specification and Third-Party Components
Security and data-protection description	Security and Data Protection Statement

Usually requested	Where it is
Data processing terms, standard contract for transfers abroad (KVKK)	Contract; needed only where the vendor processes customer data
Documentation in Turkish	Not part of this package
Licence agreement, warranties, prices	Contract

Document history

Document version	Date	Product version	Change
1.0	2026-10-06	1.6.0	First issue