



HULLCORE · KVKK

Sub-processor List

List of the third-party service providers (sub-processors) Hullcore (Osman Can Çınar), as Data Controller, uses to process personal data in connection with the Hullcore flagship application and the hullcore.dev site. The binding language is Turkish — see the Turkish page for the authoritative text.

Hullcore (Osman Can Çınar), as Data Controller, works with the service providers listed below to operate the Hullcore flagship application and the hullcore.dev website. These providers process personal data only for the purposes described in this list and are bound by the applicable data-transfer safeguards described below. This list reflects providers that are wired into the product today; rows marked as conditional apply only when the related feature is actually enabled or has moved from testing to production.

Sub-processor	Country	Purpose	Data transferred	Scope/condition
Cloudflare, Inc.	United States (global edge network; data may be processed outside Turkey)	Contact/lead-form compute and storage (Workers + D1), bot/anti-abuse verification (Turnstile), DNS for the hullcore.dev zone, and Cloudflare Tunnel edge routing for the flagship mobile API (api.hullcore.dev)	Contact form: name, e-mail, message text, IP address, User-Agent, request Origin header, timestamp. Bot-check: visitor IP and a verification token. DNS/tunnel: connecting IP addresses for site and API traffic in transit.	Active

Sub-processor	Country	Purpose	Data transferred	Scope/condition
Netlify, Inc.	United States	Static web hosting for the hullcore.dev marketing site	Ordinary visitor IP address and standard HTTP request metadata for anyone loading the marketing site's pages	Active
Google LLC (Firebase / Google Cloud Platform)	United States (Google's global infrastructure)	Push notifications for the Android and iOS flagship apps; optional analytics/crash reporting (Firebase Analytics/Crashlytics)	Push: device push token. Analytics/crash — only after you make an explicit consent decision (denied by default on a fresh install): usage/analytics events and crash/performance diagnostics. The Analytics/Crashlytics SDK initializes on every launch, but collection itself stays off until you opt in.	Push — Active. Analytics/Crashlytics — Consent-gated (opt-in, default off)
NetGsm İletişim ve Bilgi Teknolojileri A.Ş.	Turkey	Intended production SMS/OTP provider for customer-facing SMS	Recipient phone number and OTP/message content	Conditional — not yet in production use
Twilio Inc.	United States	SMS delivery for OTP/phone verification, evaluated in testing	Recipient phone number and OTP code content	Conditional — testing only; not the production SMS provider, no live account
SMTP-compatible transactional	Deployment region (not yet selected)	Intended transactional e-mail sending (e.g. account	Recipient e-mail address and	Conditional — not yet in production

Sub-processor	Country	Purpose	Data transferred	Scope/condition
e-mail provider (vendor selected at deployment; e.g. AWS SES)		verification / invite e-mails)	message subject/body	use; no vendor selected today
Sentry (Functional Software, Inc.)	United States / European Union	Optional error and performance monitoring for the web surface	Error and performance diagnostics	Conditional — not configured for this application today; inert without a project key, and would activate only with your explicit consent where consent applies
Generative-AI / LLM provider (deployment-configured; e.g. Anthropic or Google)	Provider's own region, if/when adopted (commonly abroad)	In-app AI concierge assistant referenced in product materials	None today. If/when a real provider is connected: assistant message/prompt content and related knowledge-base context.	Conditional — mock only; no real AI provider is connected today, no data is sent

Providers Established Abroad

Some of the sub-processors listed above are established outside Turkey. Personal data transferred to such providers is transferred under Article 9 of the Law on the Protection of Personal Data No. 6698 ("LPPD"), relying on the standard contract adopted by the Personal Data Protection Board as the transfer basis, together with the provider's own contractual and technical safeguards.

Notice of Changes

Where Hullcore (Osman Can Çınar) adds, removes, or replaces a sub-processor in a way that affects the processing of your personal data, this list is updated and the change is

announced before it takes effect.

Model Training

Personal data processed through the Hullcore flagship application and hullcore.dev is not used to train the AI models of the sub-processors listed above. This applies to any AI provider named in this list only once, and for as long as, that provider is actually connected to the product; it is not itself a guarantee governing providers not listed here.

Currency

This list is effective as published and is kept up to date as sub-processors change. For questions about this list, contact legal@hullcore.dev.

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Hullcore

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