

CLARIFICATION NOTICE PREPARED PURSUANT TO THE LAW ON THE PROTECTION OF PERSONAL DATA NO. 6698

PERSONAL DATA POLICY

General Information About the Personal Data Protection Law

The Law on the Protection of Personal Data No. 6698 (hereinafter referred to as “KVKK”) was adopted on 24 March 2016 and published in the Official Gazette No. 29677 dated 7 April 2016. Part of the KVKK entered into force on the date of publication, and part of it on 7 October 2016.

Information in the Capacity of Data Controller

Pursuant to the KVKK No. 6698 and in our capacity as Data Controller, your personal data will — within the framework explained on this page — be recorded, stored, updated, disclosed to / transferred to third parties in cases permitted by law, classified, and processed in the ways set out in the KVKK.

How Your Personal Data May Be Processed

Pursuant to the KVKK No. 6698, the personal data you share with our Company may be processed by us — wholly or partially, by automated means, or by non-automated means provided that they form part of a data recording system — by being obtained, recorded, stored, altered, reorganised; in short, becoming subject to any kind of operation carried out on the data. Under the KVKK, any operation carried out on data is regarded as “processing of personal data”.

Purposes and Legal Grounds for Processing Your Personal Data

The personal data you share are processed:

In order to perform the requirements of the services we provide to our customers in a manner appropriate to the requirements of the contract and of technology, and in order to develop the products and services we offer;

In order to record identity, address and other necessary information to identify the details of the transacting party within the scope of the Law No. 6563 on the Regulation of Electronic Commerce, the Law No. 6502 on Consumer Protection, the Regulation on Service Providers and Intermediary Service Providers in Electronic Commerce published in the Official Gazette No. 29457 dated 26.08.2015 which was prepared on the basis of these regulations, the Regulation on Distance Contracts published in the Official Gazette No. 29188 dated 27.11.2014, and other relevant legislation;

In order to draw up all records and documents that will form the basis of transactions in payment systems that are mandatory in the field of Banking and Electronic Payment, in

electronic contracts or in paper form; and in order to comply with the information-retention, reporting and notification obligations required by legislation and stipulated by other authorities;

In order to be able to provide information to public prosecutors' offices, courts and relevant public officials on matters relating to public security and in legal disputes, upon request and as required by legislation.

HOW YOUR PERSONAL DATA IS COLLECTED

Your personal data may be processed and collected:

Through forms on our Company's website and mobile applications, in the form of information such as name, surname, Turkish ID number, address, telephone, work or private e-mail address; as well as preferences on pages accessed using a username and password, IP records of the transactions carried out, cookie data collected by the browser and data containing browsing duration and details, and location data;

Verbally, in writing or electronically, through channels such as our sales and marketing department employees, our branches, our suppliers, other sales channels, paper forms, business cards, digital marketing and the call centre;

From persons who share their personal data by means such as business cards, curriculum vitae (CV) and submitting offers, for purposes such as establishing a commercial relationship with our Company, making a job application or submitting a bid — whether in a physical or virtual environment, face to face or remotely, verbally or in writing or electronically;

In addition, data obtained indirectly through different channels — data obtained from (micro) websites used for purposes such as the website, blog, competitions, surveys, games and campaigns, and from social media; e-newsletter reading or clicking activities; data provided by publicly available databases; and profiles and data made open to sharing on social media platforms.

Your Personal Data Obtained Before the KVKK Entered Into Force

Your personal data lawfully obtained before 7 April 2016, the effective date of the KVKK — through membership, consent for electronic messages, product/service purchases and other means — are also processed and maintained in accordance with the terms and conditions set out in this document.

Transfer of Your Personal Data Abroad

Your personal data collected by any of the methods listed above, whether processed in Turkey or processed and stored outside Turkey, may also — provided that they remain within the scope of the KVKK and in accordance with the purposes of the contract — be transferred to service

intermediaries located abroad (in countries accredited by the Personal Data Protection Board and offering adequate protection with regard to the protection of personal data).

Keeping Personal Data Current and Accurate

Pursuant to Article 4 of the KVKK, our Company has an obligation to keep your personal data accurate and up to date. In this context, in order for our Company to fulfil its obligations arising from the applicable legislation, our Customers are required to share their accurate and current data or to update them via the website / mobile application.

Rights of the Personal Data Owner Pursuant to the KVKK No. 6698

Article 11 of the KVKK No. 6698 entered into force on 7 October 2016, and pursuant to the relevant article, the rights of the Personal Data Owner after this date are as follows. By applying to our Company (the data controller), the Personal Data Owner has the right, in relation to themselves, to:

Learn whether their personal data is being processed;

Request information about it if their personal data has been processed;

Learn the purpose of processing their personal data and whether they are used in accordance with that purpose;

Know the third parties to whom the personal data are transferred, domestically or abroad;

Request the correction of personal data in the event that they have been processed incompletely or inaccurately;

Request the erasure or destruction of their personal data within the framework of the conditions stipulated in the KVKK legislation;

Request that, when correction of incomplete or inaccurate data and erasure or destruction of personal data are requested, this be notified to the third parties to whom the personal data have been transferred;

Object to the occurrence of a result to their detriment through the analysis of the processed data exclusively by means of automated systems;

Request compensation for damage in the event that they suffer damage due to the unlawful processing of the personal data.

You may submit your applications and requests regarding your personal data to BORA KÜÇÜK TELEDİYALOG COMMUNICATION through the application methods mentioned in the Data Subject Application Form on our website. Your rights requests concerning your personal data will be assessed and concluded free of charge as soon as possible and within thirty (30) days at

the latest; however, if the transaction requires an additional cost, a fee may be charged from you in accordance with the principles set out in the relevant Communiqué. Our reasoned response to your application will be delivered to you at the address you specified in the application, primarily by electronic mail or post, or, if possible, by the method through which the request was made.

BORA KÜÇÜK TELEDİYALOG COMMUNICATION is the Data Controller within the scope of the KVKK. The Data Controller Representative to be appointed by our Company will be announced in the Data Controllers' Registry and at the web address where this document is located once the legal infrastructure is in place. Personal Data Owners may direct their questions, opinions or requests to any of the following contact channels:

NAME/TITLE: BORA KÜÇÜK TELEDİYALOG COMMUNICATION

ADDRESS: Barbaros Mah. Halk Cad. Kardelen Sok. No: 2 Kat: 9 D: 34 PK: 34746
Ataşehir/İSTANBUL

E-MAIL: ik@telediyalog.com

TELEPHONE: +90 (536) 341 72 97