



**EKİNOKS YAZILIM DONANIM A.Ş.**

**POLICY**

**ON**

**PERSONAL DATA PROTECTION AND PROCESSING**

**v.1.0**

**February 2024**



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## **1 SECTION 1 – INTRODUCTION**

### **1.1 INTRODUCTION**

As Data Responsible, Ekinoks Yazılım Donanım A.Ş. (“Ekinoks” or “Company”) takes the utmost care when it comes to the protection of personal data of its customers, employees and all natural entities it is in relation. Hereby “Policy on Personal Data Protection and Processing” (“Policy”) describes the principles adopted for execution of personal data processing activities by our Company as well as the basic principles adopted for compliance of our Company’s data processing activities with the regulations mentioned in the Law No. 6698 on Protection of Personal Data (“Law”) and so our Company informs the owners of personal data and ensures necessary transparency and by being fully aware of our responsibility herein, your personal data are processed and protected under our Policy..

Activities performed by our Company for protection of personal data of our employees is managed under the “Policy on Protection and Processing of Personal Data of Employees” of Ekinoks, which is prepared in parallel with the principles of this Policy.

In case of any discrepancy between the original Turkish version and any translated version of this Policy, the Turkish version must be taken into consideration.

#### **1.1. SCOPE**

This policy is for all personal data of persons other than our Company’s employees, which are processed automatically or non-automatically, provided that they are a part of any data recording system. Detailed information about these owners of personal data can be found in Annex-2 of the Policy (“*Annex-2 Owners of Personal Data*”).

#### **1.2. IMPLEMENTATION OF THE POLICY AND APPLICABLE LEGISLATIONS**

Currently effective legal arrangements for processing and protection of personal data will be initially applied. If there is any discrepancy between currently effective legislations and this Policy, our Company agrees that currently effective legislations will be applied. The Policy materializes and arranges legislative rules in accordance with the Company’s practices.

#### **1.3. EFFECTIVITY OF THE POLICY**

This Policy is issued by our Company and effective as of 01/11/2019. If all or certain articles of this Policy are renewed, the Policy’s effective date will be updated. The Policy is published on the website of our Company (<https://www.ekinokssoftware.com>) and made available for relevant persons upon a request of personal data owners.

## **2 SECTION 2 – ISSUES FOR PROTECTION OF PERSONAL DATA**

### **2.1 ENSURING THE SECURITY OF PERSONAL DATA**

Our Company takes necessary measures, based on the type of data to be protected, in order to prevent illegal disclosure, access, and transfer of personal data or any other security deficiency in accordance with Article 12 of the Law. For this purpose, our Company takes administrative measures to achieve necessary



level of security in accordance with the guides published by the Personal Data Protection Board (“Board”) and makes or causes necessary audits to be made.

## **2.2 PROTECTION OF SPECIAL CATEGORIES OF PERSONAL DATA**

Importance is attributed by the Law to sensitive personal data since it has a risk to cause discrimination or unjust treatment of data owner when they are illegally processed. Such “special categories” of personal data are the data related with race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance, membership to an association, society or labor union, health, sexual life, criminal sentence, and security measures and biometric and genetic data.

For this purpose, any technical and administrative measure taken by our Company to protect personal data are also applied diligently to special categories of personal data and our Company ensures that necessary audits are performed.

Detailed information on protection of special categories of personal data are given in Section 3.3 of this Policy.

## **2.3 INCREASING AND AUDITING THE AWARENESS OF BUSINESS UNITS FOR PROTECTION AND PROCESSING OF PERSONAL DATA**

Our Company provides necessary trainings to business units in order to increase the awareness for preventing illegal processing of and illegal access to personal data and for storage of such data. Our Company establishes necessary systems to create awareness of our current employees and recently recruited employees for protection of personal data and, if needed, works together with advisors. For this purpose our Company evaluates participations to relevant trainings, seminars and informative sessions and organizes new trainings in parallel with updates to applicable legislations.

## **3 SECTION 3 – ISSUES FOR PROCESSING OF PERSONAL DATA**

### **3.1 PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH PRINCIPLES REQUIRED BY LEGISLATIONS**

#### **3.1.1 Processing in Accordance with Laws and Rules of Integrity**

Personal data are processed in accordance with the rules of general trust and integrity in a manner so as not to impair fundamental rights and freedom of persons. Accordingly, personal data are processed to the extent it is required by operations of our Company.

#### **3.1.2 Ensuring that Personal Data are Correct and, If Necessary, Updated**

Our Company takes necessary measures to ensure that personal data are correct and updated when they are processed and establishes the mechanisms, either physical or electronic, to ensure that correctness and up-to-datedness of personal data are maintained at certain periods.

#### **3.1.3 Processing for Certain, Clear and Legitimate Purposes**

Our Company clearly specifies the purposes of processing personal data and processes them in accordance with its business operations and for purposes in connection with these operations.



### **3.1.4 Being Connected and Restricted with the Purpose of Processing and to the Extent Required by That Purpose**

Our Company collects personal data only to the extent and in the type required by its business operations and it processes them only for specified purposes.

### **3.1.5 Keeping Personal Data for the Period Prescribed by Applicable legislations or as Required for the Purpose of Processing**

Our Company keeps personal data as long as they are required for their purpose of processing and throughout the minimum term prescribed by applicable legislations. For this purpose, our Company initially determines whether any period is prescribed in applicable legislations for keeping personal data or not and, if any period is prescribed, it acts accordingly. If there is not any legal period, personal data are stored for the period needed for their purpose of processing. Personal data are destroyed at the end of their storage period in accordance with their periodical periods of destruction or upon an application of the data owner and through the determined methods of destruction (deletion and/or elimination and/or anonymization).

## **3.2 CONDITIONS FOR PROCESSING PERSONAL DATA**

Although the basis of processing of personal data can be any of the following other than full consent of the owner of personal data, more than one of the following conditions can also be considered as legal basis. If processed data are special categories of personal data, the conditions written in Section 3.3 of this Policy ("Processing of Special Categories of Personal Data") will be applied.

#### **i. Express Consent of the Owner of Personal Data**

One of the conditions to process personal data is express consent of the owner of personal data. Express consent of the owner of personal data must be given with his/her free will and based on being informed for a certain issue. If below conditions for processing of personal data are available, personal data can be processed without requiring express consent of the data owner.

#### **ii. Clear Requirement by Laws**

If it is clearly required by the laws, in other words, if there is a clear provision in the applicable laws for processing of personal data, it is possible to mention that there is a condition for processing the data.

#### **iii. Failure to Obtain Full Consent of Relevant Person due to De Facto Impossibility**

If it becomes necessary to process the personal data of a person, who cannot provide his/her full consent or his/her full consent cannot be accepted as valid due to de facto impossibility, in order to save his/her or another person's life or physical integrity, the personal data of such data owner can be processed.

#### **iv. Directly in Connection with Execution or Performance of an Agreement**

If it is required to process the personal data, this condition will be deemed fulfilled, provided that it is directly related with the execution or performance of an agreement, to which the data owner is a party.



**v. Fulfillment of the Company’s Legal Obligation**

If it is required to process personal data in order for our Company to fulfill its legal obligations, the personal data of data owner can be processed.

**vi. Publicizing of Personal Data by Its Owner**

If data owner has publicized his/her personal data, such personal data can be processed as limited with the purpose of publicizing.

**vii. Obligation to Process the Data to Establish or Protect a Right**

If it is required to process the data in order to establish, exercise or protect a right, the personal data of data owner can be processed.

**viii. Obligation to Process the Data for Legitimate Interests of our Company**

If it is required to process the data for legitimate interests of our Company, the personal data of data owner can be processed, provided that fundamental rights and freedoms of the personal data owner are not impaired.

**3.3 PROCESSING THE SPECIAL CATEGORIES OF PERSONAL DATA**

Special categories of personal data are processed by our Company in accordance with the principles specified herein and by taking all necessary administrative and technical measures, including the methods to be determined by the Board, and in case any of the following conditions occur:

- a. Special categories of personal data other than those related with health and sexual life** can be processed without requiring any express consent if it is clearly required by the laws, in other words, if there is a clear provision in applicable laws for processing of such personal data. Otherwise, express consent of the data owner will be required.
- b. Special categories of personal data related with health and sexual life**, can be processed by persons, who are obliged to keep these data secret, or by authorized entities and organizations without requiring an express consent for purposes of protection of public health, provision of preventive medicine, medical diagnosis, treatment and health services, and planning and management of health services and financing. Otherwise, express consent of the data owner will be required.

**3.4 INFORMING THE OWNER OF PERSONAL DATA**

As the data controller of personal data, our Company informs personal data owners about who has processed the personal data, why the personal data have been processed and with whom they were shared, which methods were used to collect them, the legal reasons and rights of personal data owners for processing of personal data in accordance with Article 10 of the Law and secondary legislations.

**3.5 TRANSFER OF PERSONAL DATA**

Our Company may transfer personal data and special categories of personal data of personal data owner to third parties (public entities, suppliers, etc.) by taking necessary security measures in accordance with legal purposes of processing of personal data. For this purpose, our Company is acting in accordance with the regulations, prescribed by Article 8 of the Law. Detailed information about this subject can be found





in Annex 4 (“Annex-4 Third Parties to Whom Personal Data are Transferred by Our Company and Purposes of Transfer”).

### 3.5.1 Transfer of Personal Data

If one or several of the following conditions occur, our Company may transfer personal data to third parties by paying necessary attention and taking all necessary security measures, including the methods required by the Board even if there is not any express consent of the owner of personal data.

- If the activities regarding transfer of personal data are clearly required by laws,
- If transfer of personal data by the Company is directly related with and required for execution or performance of an agreement,
- If it is required to transfer personal data in order for our Company to fulfill its legal obligations,
- If personal data are transferred by our Company restricted with the purpose of publicizing, provided that such data have already been publicized by the data owner,
- If transfer of personal data by the Company is required for establishment, exercising or protection of the rights of the Company or data owner or third persons,
- If it is required to transfer personal data for the Company’s legitimate interests, provided that fundamental rights and freedoms of data owner are not impaired,
- If it is required to protect the life or physical integrity of the person, who cannot give his/her consent due to physical incapability or whose consent is not legally valid, or of another person.

In addition to those conditions listed above, personal data can be transferred to foreign countries, which are declared by the Board to have sufficient protection measures, (“Foreign Country with Sufficient Protection”), if any of above conditions occur. If there is not sufficient protection, personal data can be transferred to foreign countries, which are allowed by the Board and for which the data controllers in Turkey and in the relevant country undertake to provide sufficient protection in written (“Foreign Country with Data Controller that Undertakes to Provide Sufficient Protection”), in accordance with data transfer conditions required by applicable legislations.

### 3.5.2 Transfer of Special Categories of Personal Data

Special categories of personal data are processed by our Company **in accordance with the principles specified herein and by taking all necessary administrative and technical measures**, including the methods to be determined by the Board, and in case any of the following conditions occur:

- a. **Special categories of personal data other than those related with health and sexual life** can be processed without requiring any express consent if it is clearly required by the laws, in other words, if there is a clear provision in applicable laws for processing of such personal data. Otherwise, express consent of the data owner will be required.
- b. **Special categories of personal data related with health and sexual life** can be processed by persons, who are obliged to keep these data secret, or by authorized entities and organizations without requiring an express consent for purposes of protection of public health, provision of preventive medicine, medical diagnosis, treatment and health services, and planning and



management of health services and financing. Otherwise, express consent of the data owner will be required.

In addition to those conditions listed above, personal data can be transferred to Foreign Countries with Sufficient Protection if any of the above conditions occur. If there is not sufficient protection, personal data can be transferred to Foreign Countries with Data Controller that Undertakes to Provide Sufficient Protection in accordance with data transfer conditions required by applicable legislations.

#### **4 SECTION 4 – CATEGORIZATION AND PURPOSES OF PROCESSING OF PERSONAL DATA, PROCESSED BY OUR COMPANY**

Personal data are processed in our Company in accordance with general principles specified in the Law, particularly the principles specified in Article 4 of the Law pertaining to the processing of personal data and based on at least one of the conditions of personal data processing specified in the Articles 5 and 6 of the Law according to our Company's purposes of processing personal data by informing relevant persons as per Article 10 of the Law and secondary legislations. Categories of personal data that are processed in accordance with the purposes and conditions described herein and detailed information about these categories can be found in Annex-3 ("*Annex-3 Personal Data Categories*") document, attached hereto.

Detailed information about these purposes of processing of personal data can be found in Annex-1 of the Policy ("*Annex-1 Purposes of Processing of Personal Data*").

#### **5 SECTION 5 – STORAGE AND DESTRUCTION OF PERSONAL DATA**

Our Company keeps personal data as long as they are required for their purpose of processing and throughout the minimum term prescribed by applicable legislations. For this purpose, our Company initially determines whether any period is prescribed in applicable legislations for keeping personal data or not and, if any period is prescribed, it acts accordingly. If there is not any legal period, personal data are stored for the period needed for their purpose of processing. Personal data are destroyed at the end of their storage period in accordance with their periodical periods of destruction or upon an application of the data owner and through the determined methods of destruction (deletion and/or elimination and/or anonymization).

#### **6 SECTION 6 – RIGHTS OF PERSONAL DATA OWNERS AND EXERCISING THESE RIGHTS**

##### **6.1 RIGHTS OF THE OWNERS OF PERSONAL DATA**

Owners of personal data have below rights:

1. To inquire whether their personal data have been processed or not,
2. If their personal data have been processed, to request information about such processing,
3. To inquire the purpose of processing of personal data and whether such data have been used in accordance with the said purpose or not,
4. To know the third parties in or abroad, to whom the personal data have been transferred,



5. If personal data have been processed incompletely or inaccurately, to request rectification of such data and notification of third parties, to whom the personal data were transferred, about such rectifications,
6. If, despite of processing in compliance with the provisions of the Law and other applicable laws, the reasons that require processing of personal data are no longer available, to request deletion or destruction of personal data and to request the third parties, to whom the personal data were transferred, to be notified about the actions performed under this sub-paragraph,
7. To object to occurrence of any result that is to her/his detriment by means of analysis of personal data exclusively through automated systems,
8. To request compensation for the damages in case the they suffer damages due to unlawful processing of personal data.

## **6.2 EXERCISING OF RIGHTS BY PERSONAL DATA OWNER**

Personal data owners may submit their requests for their rights, listed in Section 6.1 (*“Rights of Personal Data Owners and Exercising These Rights”*) of this Policy to our Company through the methods specified by the Board. They can use “Data Owner Application Form” for this purpose, which can be accessed via our Company’s web page at [https://ekinoksoftware.com/en/personal\\_data\\_protection.html](https://ekinoksoftware.com/en/personal_data_protection.html).

## **6.3 REPLY OF OUR COMPANY TO APPLICATIONS**

Our Company takes all administrative and technical measures necessary to conclude the applications of personal data owner in accordance with the Law and secondary legislations.

If personal data owner submits his/her request for the rights listed in Section 6.1 (*“Rights of Personal Data Owners and Exercising These Rights”*) to our Company in accordance with described procedures, our Company will meet such request as soon as possible and not later than 30 (thirty) days free of charge, based on the nature of request. However, if the action requires any separate cost, the tariff determined by the Board can be requested from the applicant.



## ANNEX-1 PURPOSES OF PROCESSING OF PERSONAL DATA

MAIN PURPOSES	SUB-PURPOSES
<b>PLANNING AND EXECUTING HUMAN RESOURCES POLICIES AND PROCESSES OF THE COMPANY</b>	Planning human resources processes
	Execution of staff recruitment processes
	Planning and execution of intern and student recruitment, placement and operation processes
<b>PERFORMANCE OF NECESSARY WORKS BY OUR RELEVANT BUSINESS UNITS IN ORDER TO PERFORM COMMERCIAL ACTIVITIES OF THE COMPANY AND EXECUTION OF RELATED BUSINESS PROCESSES</b>	Operation management
	Planning and execution of operations
	Planning and execution of supply chain processes
	Planning and execution of authorization of business partners and providers to access to information
	Execution of finance and accounting activities
	Planning and execution of acquisition operations
	Planning and execution of corporate communication operations
	Planning and execution of corporate management operations
	Planning and execution of manufacturing processes
	Planning and execution of effectiveness, efficiency and pertinence of analysis regarding business activities
	Planning, execution and examination of information security processes
	Planning and execution of corporate sustainability activities
	Planning and execution of logistical activities
	Planning and execution of operations regarding continuity of business activities
Designing and managing information technologies substructure	
Planning and execution of social responsibility and civil society activities	
<b>PERFORMANCE OF NECESSARY WORKS BY OUR BUSINESS UNITS IN ORDER TO ENSURE THAT RELEVANT PERSONS CAN BENEFIT FROM THE PRODUCTS AND SERVICES OFFERED BY THE COMPANY</b>	Planning and execution of post-sale customer support service activities
	Execution of contracts and legal demands
	Execution of customer demands and complaints
	Planning and execution of customer relations
	Execution of relations with business partners and providers
	Planning and execution of goods and services sales
<b>PLANNING AND EXECUTION OF COMMERCIAL AND BUSINESS STRATEGIES OF THE COMPANY</b>	Planning and execution of external training activities
	Execution of strategic planning activities



	Execution of relations with business partners and providers
<b>PLANNING AND EXECUTION ACTIVITIES REQUIRED TO PROMOTE COMPANY AND OFFER GOOD AND SERVICES SPECIFIED THROUGH PREFERENCES AND USAGE HABITS OF DATA OWNER</b>	Planning and execution of marketing processes of goods and services
	Detection and assessment of marketing subjects through customer behavior criteria
	Planning and execution of activities regarding enhancement and development of experiences of user who benefits from the Company's goods and services
	Designing and execution of personal marketing and personal promotion activities
	Planning and execution of Company's production and operational risk processes
	Designing and execution of commercial, promotion and marketing activities in digital and other platforms
	Planning and execution of data analytics with the intention of marketing
	Planning and execution of marketing research for sales and marketing of goods and services
	Planning and execution of activities regarding trademark communication and reputation
	Planning and execution of processes regarding creation and enhancement of customer loyalty
	Ensuring customer satisfaction and organizing competitions and sweep-takes with the intention of marketing
	Planning and execution of business continuity activities
<b>ENSURING THE LEGAL, TECHNICAL, AND COMMERCIAL BUSINESS SECURITY OF THE COMPANY AND RELEVANT PERSONS THAT HAVE BUSINESS RELATIONSHIP WITH THE COMPANY</b>	Visitor records and monitoring visitor records
	Planning and execution of activities required to ensure that business activities of the Company are operated in accordance with the Company procedures and related legislation
	Providing safety to the Company's operations
	Assurance of accurate and up to date data
	Planning and execution of financial risk processes of the Company
	Execution and planning of the Company's audit activities
	Execution of legal transactions stemming from the Company law
	Informing entitled organizations regarding information provided by related legislations
	Execution of legal transactions
	Providing safety to the Company resources and fixtures, examination of the Company resources and fixtures
	Planning and execution of occupational health and safety processes
	Planning and execution of business continuity activities



	Providing safety of the Company's premises and facilities
	Planning and execution of emergency management processes



## ANNEX-2 OWNERS OF PERSONAL DATA

<b>CATEGORIES OF PERSONAL DATA OWNERS</b>	<b>DESCRIPTION</b>
<b>CUSTOMER</b>	Natural person, who is using or has used the products and services offered by our Company regardless of having a contractual relationship with our Company or not
<b>POTENTIAL CUSTOMER</b>	Natural person, who displays in interests or makes a request to use the products and services offered by our Company or who is deemed to have such interest based on evaluations in line with commercial customs and rules of integrity
<b>VISITOR</b>	Natural person, who has entered physical locations of our Company or has visited our website for various purposes
<b>THIRD PERSON</b>	Third party natural person, who are associated with above mentioned parties in order to ensure the security of commercial transactions between our Company and these persons or to protect the rights and interests of these persons (e.g. their family members and relatives) or other natural persons not covered by the “Policy on Protection and Processing of Personal Data of Employees” of Ekinoks
<b>EMPLOYEE CANDIDATE</b>	Natural persons (including candidate interns), who have applied to our Company through any means in order for a job or have allowed our Company to examine their resumes and other relevant information
<b>COMPANY STAKEHOLDER</b>	Natural persons that are shareholders of our Company
<b>COMPANY REPRESENTATIVE</b>	Member of board of directors of our Company and other authorized natural persons
<b>EMPLOYEES, SHAREHOLDERS AND REPRESENTATIVES OF ORGANIZATIONS WHICH WE COLLABORATE</b>	Natural persons, who are employees, shareholders and representatives of organizations (including but not limited to business partners, affiliates, suppliers), with which our Company is in a business relationship



### ANNEX-3 PERSONAL DATA CATEGORIES

PERSONAL DATA CATEGORIES	DESCRIPTION
<b>IDENTITY DETAILS</b>	These are the data that include identity details of the person: documents such as driving license, identity card and passport containing information such as name-surname, Turkish Republic ID, nationality, parent's names, date and place of birth and sex, and information such as tax ID, title, work registration ID, vehicle plate number, etc.
<b>COMMUNICATION INFORMATION</b>	Phone number, correspondence address, e-mail address, fax number
<b>LOCATION DATA</b>	Data that detects data owner's location while data owner uses our goods and services or our employees and employees of corporations which we work with
<b>CUSTOMER INFORMATION</b>	Information that acquired and produced as a result of our commercial activities and the operations executed by our working groups within commercial frame
<b>INFORMATION OF FAMILY MEMBERS AND RELATIVES</b>	Processed information about data owner's family members and relatives, within scope of our Company's commercial activities regarding goods and services provided by our Company or to protect legal and any kind of interest of the Company and the customer
<b>CUSTOMER TRANSACTION INFORMATION</b>	Information which is identified or identifiable and placed in our data record system; such as records intended to use of our goods and services and information regarding demands and instructions related our customers usage of our goods and services
<b>PHYSICAL PREMISES SECURITY INFORMATION</b>	Personal data relating to the records and documents obtained when entering to physical premises and during the stay in such premises which explicitly belongs to an identified or identifiable real person and are a part of the data recording system, such as camera records, fingerprints and records received at security desk
<b>TRANSACTION SECURITY INFORMATION</b>	Data owner's personal data that our Company processes in order to provide technical, legal and commercial safety
<b>RISK MANAGEMENT INFORMATION</b>	Personal data processed by means in accordance with legal principles, customs of trade and principles of good faith for us to manage our commercial, technical and administrative risks which explicitly belongs to an identified or identifiable real person and are a part of the data recording system
<b>FINANCIAL INFORMATION</b>	Data which explicitly belongs to an identified or identifiable person, is processed partly or completely part of recording system that is automatic or non-automatic; created in correlation with type of legal relationship between our Company and data owner such as information, documents and records indicate financial results, IBAN numbers, credit card information, financial profile, income certificates and asset data
<b>PERSONAL INFORMATION</b>	Any personal data processed for obtaining the information that is required for the establishing the basis of personnel rights of our employees or real persons having a working relation with our Company; which explicitly belongs to an





	identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system
<b>CANDIDATE EMPLOYEE INFORMATION</b>	Data of natural person who applied for a job in our Company and assessed as candidate employee by our Company's Human Resources department in accordance with precedents and processed data of our employees
<b>SPECIAL CATEGORIES OF PERSONAL DATA</b>	Data related to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of association, foundation or trade union, health, sexual life, criminal conviction and security measures, and biometrics and genetics
<b>MARKETING INFORMATION</b>	Data processed to promote our Company and offer good and services specified through preferences and usage habits of related person, and documents and evaluations resulting from aforementioned processing
<b>REQUEST/COMPLAINT MANAGEMENT</b>	Data processed within the scope of evaluation of complaints and demands directed to our Company
<b>VISUAL AND AUDITORY DATA</b>	Information which explicitly belongs to an identified or identifiable real person, such as photograph or camera records (except data belonging to Physical Premises Security Information category), voice recording and copies of documents containing personal data
<b>AUDIT AND INSPECTION INFORMATION</b>	Personal data processed within the scope of compliance with the legal obligations of our Company and Company policies, such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system
<b>LEGAL PROCEDURE AND COMPLIANCE INFORMATION</b>	Data processed within scope of legal obligations determination and execution of our Company's claims and rights, discharge debts and compliance through our Company's policies



**ANNEX-4 THIRD PARTIES TO WHOM PERSONAL DATA ARE TRANSFERRED BY OUR COMPANY AND PURPOSES OF TRANSFER**

In accordance with the Articles 8 and 9 of the Law, our Company can transfer personal data to the categories of persons listed below:

- (i) Shareholders
- (ii) Business Partners
- (iii) Suppliers
- (iv) Affiliates
- (v) Legally Authorized Entities of Private Law
- (vi) Legally Authorized Public Entities and Institutions
- (vii) Members of the Board of Directors of the Company

The scope of persons listed above, to which the data can be transferred, and the purposes of transfer are described below.

<b>PERSONS TO WHOM DATA CAN BE TRANSFERRED</b>	<b>DEFINITION</b>	<b>PURPOSE OF DATA TRANSFER</b>
<b>SHAREHOLDERS</b>	In accordance with the provisions of related legislations Company shareholders, authorized in designing strategies on commercial activities of our Company and planning of audit activities	Restricted with determination of commercial activities of our Company and planning of audit activities in accordance with provisions of related legislations
<b>BUSINESS PARTNERS</b>	The companies that our Company cooperates to market or sale goods and services of our Company, or develop joint products and services under a signed contract, and have other transactions	Restricted with aim of reason behind construction of business partnership
<b>SUPPLIERS</b>	Within the framework of our Company’s financial activities, parties that provide services in accordance with our Company’s data processing aims and instructions	Restricted with aim of providing external services that required for our Company to undertake commercial activities
<b>AFFILIATES</b>	Companies that our Company is a shareholder and controls	Restricted with commercial activities that requires participation of affiliates
<b>LEGALLY AUTHORIZED ENTITIES OF PRIVATE LAW</b>	Means entities or organizations that were established in accordance with certain legally	Restricted with the purposes of the request made by the organization and institution within



	determined conditions and do operate in accordance with applicable laws (e.g. independent auditors)	the scope of their legal authorization
<b>LEGALLY AUTHORIZED PUBLIC ENTITIES AND INSTITUTIONS</b>	Public entities and organizations that are authorized to receive information and documents from our Company according to the provisions of applicable legislations. For example, NSM, CMB, EMRB, Competition Board, etc.	Restricted with the purpose, requested by relevant public entity and organization under its legal authority
<b>MEMBERS OF THE BOARD OF DIRECTORS OF THE COMPANY</b>	Management Board of our Company	Restricted with aim of execution of the activities of Management Board of our Company