

## **CLARIFICATION TEXT FOR THE PROCESSING OF PERSONAL DATA OF THE COMPANIES FORMING ÖZDOĞAN GRUP**

We show maximum sensitivity to the matter of the security of your personal data. With this awareness, as the Company, we attach great importance to the processing and storage of any personal data of all persons associated with the Company, including the persons benefiting from our products and services, in compliance with the Law number 6698 Protecting Personal Data (LPPD). Fully realizing this responsibility, we process your personal data in the capacity of “**Data Supervisor**” as defined in LPPD as explained below and in the framework of the limits of the imperative provisions of the legislation.

### **1. Gathering, Processing Personal Data and Processing Purposes;**

Although your personal data may vary depending on the services provided by our Company and the commercial activities of our Company, these may be gathered with automatic or non-automatic methods, verbally, written or electronically by the sites, units and offices of our Company, Group Companies, internet site, social media, mobile applications and like means. As long as you use the products and services offered by our Companies which compose the Group, your personal data shall be updated and processed.

In addition, when you use our call centers or internet page for the purpose of using the services of the Company, when you visit our Company or our internet site, when you attend the trainings, seminars or organizations organized by our Company, your data may be processed.

Your personal data gathered for the purpose of making you benefit from the products and services offered by our Company, customizing these according to your taste, usage habits and needs and proposing to you, performing the studies by our work units to ensure the legal and commercial safety of the persons having business relations with our Company (administrative operations directed to communication carried out by our Company, provision of the physical security and supervision of the Company locations, customer assessment/complaint management processes, recognition research processes, event management, legal harmonization period, auditing, financial affairs, etc.), determination and application of the commercial and business strategies of our Company, provision of carrying out the human resources policies of our Company shall be processed within the personal data processing conditions and purposes indicated in articles 5 and 6 of LPPD.

### **2. To Whom and For What Purposes the Processed Personal Data May Be Transferred**

Your gathered personal data may be transferred to our business partners, suppliers, Group Companies, Company authorities, our shareholders, legally authorized public

bodies and private entities in the framework of the personal data processing conditions and purposes indicated in articles 8 and 9 of LPPD for the purposes of providing the performance of studies by our work units to make you use the products and services offered by our Company, customizing these according to your taste, usage habits and needs and proposing to you, performing the studies by our work units to ensure the legal and commercial safety of the persons having business relations with our Company (administrative operations directed to communication carried out by our Company, provision of the physical security and supervision of the Company locations, business partner/customer/supplier/subcontractor (authorized or employee) assessment processes, recognition research processes, legal harmonization period, auditing, financial affairs, etc.), determination and application of the commercial and business strategies of our Company, provision of carrying out the human resources policies of our Company.

### **3. Personal Data Gathering Method and Its Legal Reason**

Your personal data is achieved in any verbal, written or electronic media with the aim of submitting the products and services offered by our Company in the determined legal framework in the direction of the purposes included above and, in this scope, to enable our Company to perform fully and properly its responsibilities arising from the contract and law. Your personal data gathered with this legal reason may also be processed and transferred for the purposes indicated in articles (1) and (2) of this text in the scope of personal data processing conditions and purposes specified in articles 5 and 6 of LPPD.

### **4. Rights of the Personal Data Owner Listed in article 11 of Law of PPD**

As personal data owners, in case you communicate your requests concerning your rights, to our Company with the methods arranged below in this Clarification Text, our Company shall finalize the request latest within thirty days free of charge according to the nature of the request. However, in the event that a fee is foreseen by the Board of Protecting Personal Data, the fee in the tariff determined by our Company shall be taken. In this scope, the personal data owners have the rights of;

- Learning if personal data is processed or not,
- Requesting information if personal data is processed,
- Learning the purpose of processing the personal data and whether or not these are used for their purpose,
- Knowing about third parties inland and abroad to which the personal data is transferred,
- In case the personal data is processed incorrectly or deficiently, asking remedial actions and notification of the action taken in this scope the third parties to which the personal data is transferred,

- Although having been processed in compliance with the provisions of LPPD and other relevant laws, if the reasons which require processing have ceased, asking the deletion or destruction of the personal data and asking the notification of the action taken in this scope the third parties to which the personal data is transferred,
- Raising objection to the occurrence of a result against the person by the exclusive analysis of the processed data by means of the automatic systems,
- Requesting the compensation of loss in case of damage incurred due to the illegal processing of the personal data.

You may communicate your request concerning the above indicated rights to our Company in writing or by other methods determined by the Board of Protecting Personal Data in accordance with article 13, clause 1 of LPPD. You must communicate your application in writing to our Company in accordance with LPPD since the Board of Protecting Personal Data hasn't yet determined any method in this stage. In this framework, the channels you shall communicate your application in writing and the procedures in the applications you shall make to our Company in the scope of article 11 of LPPD are explained below.

You can communicate your request of using your rights indicated above containing the necessary information for your identification and your explanations about the right which you want among those listed in article 11 of LPPD personally by hand, send via notary public or with the other methods specified in the Law of PPD to the address **Çetin Emeç Bulvarı 1328. Cad. No:18 A.Öveçler/ANKARA** together with a signed copy of the form in **[www.ozdogan.com.tr](http://www.ozdogan.com.tr)** completed by you and certificates of your identification or transmit the related form via mail to **[kvkk@ozdogan.com.tr](mailto:kvkk@ozdogan.com.tr)** and **[ozkarins@hs01.kep.tr](mailto:ozkarins@hs01.kep.tr)**.