

EGİS TÜNEL İŞLETMECİLİĞİ ANONİM ŞİRKETİ CLARIFICATION TEXT IN RELATION TO THE PROTECTION AND PROCESSING OF PERSONAL DATA

1. Data Controller

Pursuant to the Personal Data Protection Law numbered 6698 (the “PDPL”), by this Clarification Text in Relation to the Protection and Processing of Personal Data (“**Clarification Text**”), we, as Egis Tünel İşletmeciliği Anonim Şirketi (“**ETİ**” and/or the “**Company**”), would like to inform you, our valued visitors, under our obligation to inform pursuant to the PDPL in our capacity as Data Controller.

Personal data under the PDPL means any and all information in relation to a real person, who is identified or identifiable (“**Personal Data**”), and Special Categories of Personal Data, which is a special type of this, means the data in relation to race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, attire, memberships to associations, foundations or unions, health, sexual life, criminal convictions and security measures and biometric and genetic data (“**Special Categories of Personal Data**”). In this context, the definition of Personal Data also includes your Special Categories of Personal Data.

2. Method of Collection of Cookies and Legal Basis of Processing

Your Personal Data is collected, in connection with the transactions entered into with the Company and for the purpose and within the scope indicated in Section 4 below, by third parties working under an agreement with the Company by automated or non-automated means, in verbal, written and electronic form by way of the below methods.

- a. Via the visits made to the website owned by the Company,
- b. Via the verbal and written complaints made by the users and/or visitors on the website, social media or complaint platforms of the Company,
- c. By third parties from which the Company receives services and which are under an agreement in terms of a business relationship.

The legal bases set forth in articles 5 and 6 of the PDPL in relation to the processing of your Personal Data are as follows:

- a. Your explicit consent,
- b. Being explicitly provided for by the laws,
- c. Being necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to express his/her consent due to the physical disability or whose consent is not deemed legally valid,
- d. Processing of personal data in relation to the establishment or performance of an agreement,
- e. Being required for the fulfilment of our legal obligations,
- f. Being made public by the data subject himself/herself,
- g. Being required for the establishment, exercise or protection of a right, and

h. Provided that your fundamental rights and freedoms are not violated, being required for our legitimate interests.

3. Your Personal Data Collected

Your Personal Data may be transferred or made available, within the country or abroad, by the Company in accordance with your explicit consent or under other circumstances legally allowed (and for the purposes specified in Clause 4) to;

- a. To real or legal persons (from which support and consultancy services are received in security, software, law or tax or similar fields) which are found reasonably necessary for the purposes of the processing specified above,
- b. To third parties from which support services are received in various fields (companies providing support in call center, client services, advertisement and cloud computing, back-up, software and similar) within the scope of the purposes specified above in relation to the activities of the Company,
- c. To authorized institutions and organizations and official public institutions and organizations, and, if requested, to judicial authorities and relevant police forces for the purposes of resolution of legal disputes, fulfillment of obligations arising from legislation,
- d. In case the Company or the persons, to which we transfer personal data, have the right, or the obligation to disclose or the disclosure of the personal data is legally allowed or required by law.

This may include countries which, pursuant to the Law and implementation legislation, do not provide the same level of legal protection.

4. Security of Your Personal Data

The Company, while conducting its data processing activities for the purposes of;

- a. preventing unlawful processing of personal data,
- b. preventing unlawful access to personal data,
- c. ensuring the protection of personal data,

is obligated to take any and all technical and organizational measure to provide the appropriate level of security.

It is of importance that your personal data are accurate and up-to-date. In case any information is inaccurate or not up-to-date, you have the right and obligation to immediately contact the Company. The Company will correct, update, erase or delete such information.

5. Your Rights

To the extent your data are processed by the Company and the Company processes your data in its capacity as data controller, pursuant to article 11 of the PDPL, you have the following rights:

- a. to learn whether any of your personal data is processed,
- b. to request information in relation to the activities of processing of your personal data,
- c. to learn the purposes of the processing of your personal data and whether these personal
- d. data are used in compliance with these purposes,

- e. to be informed on the third parties, in case personal data are transferred to third parties within the country or abroad,
- f. in case personal data are processed incompletely or inaccurately, to request the rectification of such incomplete or inaccurate data and to request that the action taken in this regard be notified to the third parties to which personal data are transferred,
- g. in case, even though the personal data are processed in compliance with the PDPL and other relevant provisions of law, the bases for processing cease to exist, to request the deletion, destruction or anonymization of the personal data within 30 (thirty) days pursuant to the provisions of the Regulation on Deletion, Destruction or Anonymization of Personal Data and to request that the action taken in this regard be notified to the third parties to which personal data are transferred,
- h. to object to the unfavorable results which may occur as a result of processing of the personal data by automated means, and
- i. in case you suffer any damages due to unlawful processing of your personal data, to request the compensation of the damage.

You may convey to the Company your requests in relation to your rights cited above by filling out the Data Subject Request Form, which you may reach at [https://www.egistunelisletmeciligi.com/wp-content/uploads/2021/06/Egis-Ilgili.Kisi_.Basvuru.Formu-Final_ENG.pdf].

In this regard, you may deliver your request in relation to your above rights by using the e-mail address provided below, which may change from time to time, by using the electronic mail address which was previously notified by you to the Company and which is registered in the Company's system (by attaching documents which identify you) or you may deliver by hand with an original-signed petition or send via notary your request to our mailing address, which, again is provided below and which may change from time to time by including documents which identify you.

The request, which you will make to use the rights specified above, which you have as a data subject, and which includes the explanations in relation to the right you request to use, the issue requested by you must be clear and comprehensible, the matter requested by you must pertain to you or, in case you are acting on behalf of another person, you must be specifically authorized and such authorization must be documents, the request must include your identity and address information.

The Company concludes the requests in the request form as soon as possible and at the latest within thirty days free-of-charge (in case there isn't any cost). However, in case the transaction requires an additional cost, the fee determined by the Personal Data Protection Board may be charged. In case the replies to the requests exceed 10 (ten) pages, a transaction fee of TL 1.00 (one) will be charged per page. In case the reply is requested in a recording medium such as a CD or flash disc, a fee will be requested as per the cost of the requested recording medium.

Data Controller: Egis Tünel İşletmeciliği Anonim Şirketi

Mailing address: Barbaros Mahallesi, Dr. Eyüp Aksoy Caddesi No:9 Üsküdar / İstanbul

E-mail address : kvkk@egis-turkey.com

Date of Latest Update: _____