

GLOBAL BİLGİ PERSONAL DATA PROTECTION POLICY

STATEMENT ON THE PROTECTION OF YOUR PERSONAL DATA

The purpose of this Data Protection Policy (hereinafter briefly referred to as the “Policy”) is to set the conditions and terms for using the personal data obtained under any service being provided by GLOBAL BİLGİ PAZARLAMA VE DANIŞMA ÇAĞRI SERVİSLERİ A.Ş (hereinafter briefly referred to as “TGB”), which is registered at the Istanbul Trade Registry with the registration number 426382, and/or received from any third parties.

TGB hereby declares that it shall comply with the applicable national legislation on personal data protection, in particular the Personal Data Protection Law (the “Law”) dated March 24, 2016 and numbered 6698 and in this context, that it has adopted the principle of protecting the privacy of personal data and accordingly, that it shall comply with any legal obligation on processing personal data.

Accordingly, this Policy was prepared to provide information on how and for what purpose your personal data is processed and protected by TGB and to ensure transparency to the best possible extent. **I. Definitions:**

According to the Law and this Policy;

- **“Personal Data”**: Refers to all personally identified and personally identifiable data regarding a real person,
- **“Anonymous Data”**: Refers to data that has been made non-associable with any personally identified or personally identifiable real persons even by combining with other data,
- **“Processing of Personal Data”**: Refers to any transaction conducted on data, such as full or partial collection, recording, storage, retention, modification, rearrangement, disclosure, transfer, receipt, making available, classification or preventing the utilization of personal data through automatic means or non-automatic means provided they are part of a data recording system.

II. For what purpose and through which means is your data collected?

Our purpose in collecting your data is to provide safe, uninterrupted, efficient and customized services for you. TGB and service providers acting on behalf of TGB collect and use your personal data under the permission required to perform the following transactions and only in the permitted manner.

Your data can be collected through call centers, websites, mobile apps, short messages, electronic mail, interactive voice response systems and any written, oral or electronic medium based on your consent for the processing of your personal data or the legal grounds specified in articles 5 and 6 of the Law and other legislation and can be processed or transferred for the purposes specified in this document.

III. Which Data is Collected?

The data processed by TGB under the offered services and considered to be Personal Data pursuant to the Personal Data Protection Law Numbered 6698, include but is not limited to the groups listed below.

- **Identification Information and Contact Details:** Your identification information such as Turkish ID number, name, surname, place and date of birth, marital status, gender, copy/image of identification certificate etc. and other information that could identify you; your contact details such as address, phone/fax, username (nickname), avatar, e-mail address etc., membership information, your passwords used for authentication and accessing the account,
- **Usage Data:** The type of messages sent (text, video etc.) without keeping any information regarding the content, active time intervals, services being followed, dates, times and durations of messages and calls sent or made under the offered services and system connection and system disconnection date and time information regarding any kind of access through the internet, usage habits regarding the interfaces you use among the applications offered by TGB, the last entry date for the concerned application and errors that occur during use and similar data, and your analytical data on award programs collected before any other services, including but not limited to satisfaction surveys or similar survey results and data collected from devices through various software and technological instruments,
- **Location Data:** Your precise or approximate locations, depending on the device settings, data identifying nearby base stations and active Wi-Fi points together with GPS data and location data and roaming data derived from IP addresses, your traffic data such as source and destination points and other connection information;
- **Payment Data:** Information and documents you send during sales processes; data obtained when contact is made through e-mail, letter or other means and your voice call records stored pursuant to call center standards; if you request, your voice record to be used as a means for authentication; your data obtained through sales such as request and transaction information on sales channels, your bill and payment information (full name - bill address), the bills sent to you and copies of receipts for the payments received from you, data such as your payment number, bill number, bill amount, bill issue date and, if you purchased any in-app service from any TGB app, your bill and payment information in this regard (full name - bill address) and likewise, bills sent to you in this regard and copies of receipts for the payments received from you, your payment number, bill number, bill amount and bill issue date,
- **Device Data:** The brand of the device you are using, the device operating system, the phone language, your operator, data regarding the SIM card and the location data of such device; your usage data generated in accordance with the usage of the products and services and the technical data required for providing the services,
- **Communication Details:** Type of communication ("BIP, SMS, mobile call, call to any direction/instant message etc.), call duration, time, type, parties and similar traffic information,

- **Agreement Data:** The agreement signed between you and TGB, undertaking etc., data thereon and if you apply for a job at TGB, any personal data including the résumé provided in this regard and the service agreement.

In accordance with the procedures and principles to be adopted by the Personal Data Protection Authority (hereinafter referred to as the “Authority”), irreversibly Anonymized Data shall not be considered as personal data pursuant to provisions of the mentioned Law and processing activities regarding such data shall be performed without being bound by the provisions of this Data Protection Policy.

IV. Purposes of Processing Personal Data:

Your personal data shall be processed pursuant to the Personal Data Protection Law Numbered 6698 and for the purposes with the following details.

As part of the services provided by TGB, they can be processed for the following purposes;

- recording, problem/error notification, control, developing or performing operational activities, business development, collection, in-house assessment, customer portfolio management, measuring service quality, communication, service analysis, complaint management, managing customer satisfaction processes, ability to transfer app membership to other devices, providing, charging and billing products and services to you; performing and following up the transactions you request regarding the products and services you ordered, purchased and/or used,
- promotion and marketing, contacting you in this regard, informing you on campaigns, discounts, benefits, terms and prices, offering advantages related to membership, events and performing the procedures regarding their use,
- presenting offers, gifts and promotions to you, making targeted presentations, sending you special celebrations, wishes, awards, lotteries as well as contents you like, may want to access again and would be pleased to be reminded about; if you participate in an award, lottery, contest etc., using the information you provided in this regard for the relevant event without having to collect it again,
- confirming your identification information and document where necessary; performing the necessary transactions to prevent abuse, loss or fraud,
- business development, marketing, analysis, advertisement, profiling, inspection and control, risk management, developing after-sales processes, in-house assessment, portfolio management, measuring and developing service quality, communication, performing complaint management processes, performing and developing operational activities, problem/error notification and improving service quality in accordance with usage habits, conducting market surveys through various methods (e-mail, online, IVR, CATI (Computer Aided Telephone Interview), service booster, SMS etc.) and creating a database to be used in market and marketing surveys, in an individually unidentifiable manner and by conducting statistical assessment on Anonymous Data,
- storage of data which should be retained pursuant to the applicable legislation; copies and backups to prevent data loss; ensuring data consistency; taking the technical and administrative measures to ensure the security of data,

- preparing industry reports by conducting assessment and analysis on anonymous data,
- providing location-based services depending on the device settings you control and if you prefer,
- if an application provided/managed by TGB is used; providing ideal use experience with the device on which the concerned application will run and ensuring that it runs compatible with the language used,
- sending SMS for debt collection,
- determining usage habits and unauthorized or fraudulent use for business development purposes and increasing service quality,
- marketing activities such as diversification, measurement and announcement of products and services, offering call center services, financial reports, legal proceedings and similar purposes including but not limited to fulfilling legal obligations required or enforced by regulatory or supervisory authorities.

V. Where is Personal Data Stored and Processed?

Personal data can be stored and processed for the purposes specified in the Policies and in compliance with the regulations to be issued by the Personal Data Protection Authority, at the location of TGB, its affiliates or subsidiary group companies or in another country where the facilities of its contracted service providers are located. Your personal data collected under this Policy shall be processed in accordance with the provisions stated herein and the legislation in force in the country where the data is stored and in accordance with the foreseen security measures.

VI. Transfer of Personal Data:

Personal data and new data acquired using such personal data can be transferred to relevant domestic and overseas persons and entities for the purposes of performance of the services provided by TGB, developing customer experience and satisfaction (including improvement and customization), ensuring customer safety, detecting fraudulent or unauthorized use, troubleshooting, authentication and realizing any of the purposes included in this Policy, including the purposes specified in this document under the laws and other legislation.

These include our partners with which cooperation is made and/or from which services are received for the performance of any service provided by TGB, such as software service or other outsourced service providers, hosting service providers, courier companies, law offices, research companies, software companies regarding complaint management and ensuring security, agencies, consultancy companies, social media channels; TGB group companies/affiliates and third parties, including but not limited to suppliers, banks, financial institutions, TBB Risk Center and other natural persons and legal entities. Additionally, personal data can be shared with public institutions and organizations tasked and authorized under the applicable legislation.

The data subject also agrees that TGB needs to process personal data during and after the use of the TGB services in the following cases:

- Providing and/or implementing a service to the data subject,
- Processing the data is required for the legal interests of TGB and/or third parties and/or exercising or protecting the legitimate interests of the data controller;
- Fulfilling any obligations in accordance with any legislation that TGB is subject to;
- If data processing is required for establishment, use or protection of a right,
- Cases for which consent is given by the data subject,
- Other issues clearly foreseen in the legislation.

VII. Rights of the Data Subject Regarding Personal Data Protection:

Pursuant to article 11 of the Law, you are entitled to the following rights by applying to TGB:

- Learn whether or not your personal data was processed,
- Request relevant information if your personal data was processed,
- Learn about the purpose of processing of your personal data and whether or not it used in accordance with such purpose,
- Learn the local and international third parties to whom your personal data is transferred,
- Request correction of personal data which were processed inaccurately or deficiently,
- Request deletion or termination of your personal data in the context of the terms foreseen in the relevant legislation,
- Request that any correction, deletion or termination performed in accordance with the relevant legislation is notified to the third parties to which the personal data was transferred,
- Objecting to any result with a negative impact on you as a result of analysis of your processed personal data solely by automatic systems,
- Request compensation for any loss suffered by you as a result of illegal processing of your personal data.

VIII. Personal Data Retention Period:

TGB shall retain the personal data for the period required in the context of the terms specified in this Policy and for the purpose for which it is processed, in order to fulfill its obligations arising from the nature of the relevant service and from its agreement, in order to ensure that the service is utilized in the best manner. Additionally, TGB shall be entitled to retain the personal data limited to the purpose of ensuring that any required defense can be made in the event of any dispute that may arise and during the statute of limitations specified by the relevant legislation.

X. Amendment of the Data Protection Policy:

TGB may update the provisions of this Data Protection Policy from time to time: Therefore, please regularly visit www.global-bilgi.com.tr for the most up-to-date version. Such updates will become effective as of the publication date.

XI. Contact:

You may send your requests regarding the implementation of the Law or any question about your personal data to the address Saray Mah. Üntel Sok Yılmaz Plaza-2 No: 1 34768 Ümraniye-Istanbul or to the REM address globalbilgi@hs03.kep.tr through public notary, certified mail etc. TGB may give its reasoned reply in written or digital format pursuant to the aforementioned requests.

No fees shall be charged for the requests. However, if the transactions incur any cost, a fee may be charged based on a tariff determined by the Personal Data Protection Authority in accordance with article 13 of the Personal Data Protection Law 6698.