

## **INFORMATION NOTE ON PROCESSING OF PERSONAL DATA**

As Zorlu Holding A.Ş. ("Zorlu Holding"), we take utmost care to protect and safeguard your personal data. In this context, we want to enlighten and inform you in the most transparent way regarding the processing of your personal data as the Data Controller in accordance with the Law on the Protection of Personal Data numbered 6698 ("Law") which regulates primarily the protection of the fundamental rights and freedoms of the persons, especially the privacy of the private life, and the protection of personal data.

### **Processing Purpose**

Your personal data is processed in accordance with Articles 5 and 6 of the Law for the purposes of conducting the necessary operational activities for the provision of services and products provided by our Holding and our group companies, carrying out necessary works with the relevant business unit and business partners for offering you personalized products and services that is appropriate for your consuming and purchasing motivations, ensuring the rights of real persons by receiving human resources management services from the Holding, taking the necessary actions for the Holding to deliver, execute and realize commercial decisions, providing the legal security of our Holding arising from such relations.

### **Third Parties the Personal Data is Transferred to and Purposes of Transfer**

In accordance with the purposes outlined in this information note, and in accordance with the 8th and 9th articles of the Law, your personal data may be transferred to Zorlu Holding group companies in Turkey and abroad, subsidiaries, our shareholders, business partners, suppliers, authorized public institutions and private persons.

### **Methods for Collection of Personal Data and Related Legal Reasons**

Your personal data can be collected by Zorlu Holding using automated or non-automated methods in all kinds of written, oral and electronic media for the purposes specified in this information note. Your personal data may be processed and transmitted for the personal data processing requirements and purposes set forth in Articles 5 and 6 of the Law.

### **Personal Data Retention Time**

Zorlu Holding will keep personal data for the period required by the purposes stated in this information note. In addition, Zorlu Holding may, in the event of any dispute with the data owner, keep personal data for a period of time specified in accordance with the relevant legislation, limited to the extent necessary for the defense of the dispute.

### **Measures and Commitments Related to Data Security**

Zorlu Holding commits to take the necessary technical and administrative measures and to make the necessary audits to ensure the appropriate level of security in order to ensure:

- that personal data are not processed unlawfully,
- that personal data are not accessed unlawfully and
- that personal data are kept confidential.

Personal data obtained by Zorlu Holding will not be used and disclosed to third parties in any case other than legal necessity and processing purposes stated in this information note.

### **Your Rights Under the Law**

As per Article 11 of the Law, as data subjects you are entitled to;

- Learn whether or not your personal data are being processed,
- Request further information if your personal data have been processed,
- Learn the purpose of processing of the personal data and whether or not data are being processed in compliance with such purpose,
- Learn the third party recipients to whom your personal data are disclosed within the country and abroad,
- Request rectification of processed personal data which is incomplete or inaccurate request notification of third parties to whom your personal data are disclosed, about such process,
- Request erasure or destruction of personal data in case the data is no longer necessary in relation to the purpose for which the personal data was collected, despite being processed in line with the Law or any other related law and request notification of third parties to whom your personal data are disclosed, about such process,
- Object to unfavorable results of analysis of processed personal data solely by automatic means,
- Demand compensation for damages suffered as a result of an unlawful processing operation.

You may communicate your requests regarding your rights to the Levent 199, Büyükdere Cad. No:199 34394 Şişli/İstanbul address where our Holding is located, to [zorluholding@hs03.kep.tr](mailto:zorluholding@hs03.kep.tr) via electronic signature, mobile signature or electronic mail address which you have previously notified to Zorlu Holding and registered in Zorlu Holding systems to [kvk@zorlu.com](mailto:kvk@zorlu.com). Our Holding will evaluate and conclude your request at least within 30 (thirty) days as stated under the Law.

The request should include the name, surname of the data subject, signature, Republic of Turkey identity number or if it is a foreign national, nationality and passport number or identity number, residence or business address, if there is, e-mail address, telephone number and fax number along with the nature of the request. Written responses up to ten pages will not be charged and Zorlu Holding reserves the right to charge a fee based on

the tariff determined by the Data Protection Authority. If the application is submitted in a recording medium such as CD or flash memory, Zorlu Holding may charge the fee for the recording medium from the data holder.

#### **Changes in the information note**

Zorlu Holding may change the provisions contained in this information note at any time by publishing. The amendments made by Zorlu Holding shall become effective on the date of publication.

#### **PERSONAL DATA PROTECTION REQUEST FORM**