

## PRIVACY POLICY

### NOTIFICATION ON PROCESSING OF PERSONAL DATA

This privacy statement explains the personal data Obase processes, how Obase processes it, and for what purposes.

**Data Controller:** Obase

**Website:** [www.obase.com](http://www.obase.com)

For further information on processing of your Personal Data, please refer to the “*Obase Group Companies Policy on Protection, Processing, Retention and Disposal of Personal Data*”(“Policy”) published on [www.obase.com](http://www.obase.com) website.

#### 1. Why do we process your Personal Data?

As the Data Controller, we may process your personal data for the following purposes:

- Negotiation, conclusion and performance of a contracts,
- Providing products and services,
- Customizing of available products and services according to demands; updating and improving the available products and services due to client needs, legal and technical developments,
- User registration to the systems, specifically for available products and services,
- Providing call center and remote support services; tracking the number and content of calls,
- Advertising new or existing products, services and campaigns; conducting sales and marketing activities,
- Conducting market research,
- Producing statistics and analysis of product use,
- Payment and collection of product and service fees; selection of the payment collection method,
- Contact/communication,
- Maintaining commercial relations with collaborating companies, suppliers, resellers and service providing companies,
- Reporting purposes within the framework of collaboration,
- Evaluating business partner applications submitted by resellers,

- Developing business strategies and plans of the company,
- Being contacted by Obase Group Companies for satisfaction surveys,
- Offering discounts for shopping from partner websites and establishments,
- Keeping record of participants, preparation of certificates/participation certificates, determination of prize/gift receivers and giving of prizes/gifts at events/trainings organized by Obase Group Companies,
- Management of judicial/administrative processes, responding to requests from public institutions and organizations, performing legal obligations in accordance with legislative regulations, settlement of legal disputes,
- Maintaining investor relations,
- In the event of a merger, demerger, transfer of the company in whole or in part; execution of the results arising from this legal procedure,
- Introducing employees of Obase Group Companies, Natural Person Resellers/Clients, Persons Related to Resellers/Clients on social media platforms,
- Conducting job interviews, evaluating job applications,
- Establishing, maintaining and concluding business relationships/contracts,
- Ensuring that employees of Obase Group Companies benefit from primary and secondary rights arising from their employment contracts, assessing their performance and activities,
- Creating user accounts for employees, handing out company ID cards and meal cards,
- Organization of transport of company employees, tracking of company pool vehicles,
- Creating participation records of employees in case of attending an organization on behalf of the company,
- Creating records of employees' attendance to trainings and certificates received,
- Keeping and tracking visitor records,
- Ensuring interior and environmental security of the company and security of the Website and Applications,

- Analysis of Website use,
- Creating personal data inventory,
- Evaluating and responding to all questions, requests, suggestions, complaints, applications, including those related to Personal Data, in written or oral form or through electronic means.

## **2. To Whom and for Which Purposes Do We Transfer Your Personal Data?**

Your Personal Data may be transferred to the following third parties at home or abroad within the scope of the purposes specified under article 1 above and in accordance with the mandatory provisions under the Law and other applicable legislation related to Personal Data:

- Audit Firms
- Clients
- Collaborating Companies
- Consultants
- Judicial Authorities and Public Authorities
- Obase Group Companies
- Resellers
- Service Providing Companies
- Shareholders
- Suppliers
- Banks and Financial Institutions

## **3. What Are Our Methods and Legal Grounds for Collection of Personal Data?**

We may collect and process your Personal Data in accordance with the provisions under the Policy, the Law and applicable legislation, making use of written, oral, electronic means, video/audio recording or vis-a-vis with you.

Our Personal Data Collection process may be carried out through: i) Website, mobile applications, e-mail, digital mediums or software belonging to third parties, including recruitment portals; ii) contracts, applications, forms, call center, remote support,

sales and marketing unit, Website cookies, business cards, telephone etc; or iii) vis-a-vis interviews with Data Subjects.

#### **4. What Are Your Rights As A Data Subject?**

Pursuant to Article 11 of the Law, you have the right to apply to our Company as the Data Subject and;

- to learn whether your Personal Data is processed,
- to request information if your Personal Data is processed,
- to learn the purpose of processing of your Personal Data and whether such data is used for intended purposes,
- to know the third parties to whom your Personal Data is transferred at home or abroad,
- to request rectification of the incomplete or inaccurate data, if any, and to request notification of such operation to third parties to whom Personal Data has been transferred,
- to request erasure or destruction of Personal Data upon disappearance of all reasons which require processing of Personal Data, despite being processed under the provisions of the Law and other applicable laws, and to request notification of such operation to third parties to whom Personal Data has been transferred,
- to object analyzing of your Personal Data exclusively by automatic means which leading to an unfavorable consequence for you,
- to claim compensation for the damage arising from the unlawful processing of your Personal Data.

However, in accordance with the provision under Article 28/2 of the Law on Protection of Personal Data, you may not exercise the rights listed above, excluding the right to claim compensation, in the following cases:

- Where processing of Personal Data is necessary for prevention of a criminal act or crime investigation.
- Where processing is carried out on the Personal Data which disclosed to public by the Data Subject himself.
- Where processing of Personal Data is necessary for inspection or regulatory duties and disciplinary investigation or prosecution carried out by public institutions and organizations and by professional associations with public institution status, assigned and authorized by the law.

- Where processing of Personal Data is necessary for protection of the State's economic and financial interests with regard to budgetary, tax-related and financial issues.

You may exercise your rights by filling and signing the application form available by clicking this link and sending the original form to the address **“Saray Mah. Site Yolu sok. No:18 K:2 34768 Ümraniye, İSTANBUL”** through a notary public's office or delivering it yourself or having it delivered by your proxy to the same address.

It is mandatory to submit the documents authenticating your identity, the documents supporting your request, if any, and if you wish to exercise such right through proxy, the copy of the proxy document including specific authorization, along with the form.

Your requests submitted with a form shall be responded free of charge within the shortest time possible depending on the nature of the request and **within thirty days at the latest**. However, in the event the procedure requires any additional costs, a fee may be charged based on the tariff determined by the Personal Data Protection Board.

In the course of an application; in the event of sharing incomplete or inaccurate information, failure to express the request clearly, lack of or improper submission of supportive documents, failure to attach a copy of the proxy document for applications through proxy, we may encounter difficulties meeting your requests which may result in delays in the investigation process. Therefore, it is important to comply with the foregoing while exercising your rights. In such cases, our company shall not be responsible for any delays. All legal rights of our company are reserved in case of any incorrect, contrary to facts/law and malicious applications.