



PERSONAL DATA PROTECTION AND PROCESSING POLICY

Target Audience:

All natural persons, other than employees of Koton Mağazacılık Tekstil Sanayi ve Ticaret Anonim Şirketi, whose personal data are processed by Koton Mağazacılık Tekstil Sanayi ve Ticaret Anonim Şirketi.

Prepared by:

Legal Department

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In case of any discrepancy between the original Turkish version of the policy and a translated version hereof, the Turkish text shall prevail.

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1. SECTION 1 – INTRODUCTION

1.1. INTRODUCTION

As Koton Mağazacılık Tekstil Sanayi ve Ticaret Anonim Şirketi (**the "Company"**), we regard the protection of personal data as one of our highest priorities in the conduct of our business activities. This Koton Mağazacılık Tekstil Sanayi ve Ticaret Anonim Şirketi Personal Data Protection and Processing Policy (**the "Policy"**) explains the principles adopted by our Company in carrying out personal data processing activities and the fundamental principles governing our compliance with the provisions of the Law No. 6698 on the Protection of Personal Data (**the "LPPD"**). It also provides detailed information regarding all personal data processing activities carried out by our Company, ensuring the necessary transparency by informing data subjects. Being totally aware of our responsibility in this regard, we process and protect your personal data in accordance with this Policy.

The activities carried out by our Company with respect to the protection of the personal data of our employees are governed by the Koton Mağazacılık Tekstil Sanayi ve Ticaret Anonim Şirketi Employees' Personal Data Protection and Processing Policy, which has been prepared in line with the principles set out in this Policy.

1.2. SCOPE

This Policy applies to all personal data of individuals, other than our Company's employees, that are processed by the Company through automated means, or by non-automated means provided that they are part of a data recording system.

1.3. APPLICATION OF THE POLICY AND THE APPLICABLE LEGISLATION

The applicable statutory provisions in force governing the processing and protection of personal data shall take precedence. In the event of any inconsistency between the applicable legislation in force and this Policy, our Company accepts that the applicable legislation shall prevail. This Policy sets out how the principles established under the applicable legislation are implemented within the Company's practices.

1.4. ENTRY INTO FORCE OF THE POLICY

This Policy has been issued by our Company and is effective as of 14 April 2025.

In case of renewal of the entire Policy or its specific articles, the date of effectiveness of the Policy shall be updated. The Policy shall be published on our Company's website and shall be made available to data subjects upon request.



2. SECTION 2 - MATTERS RELATING TO THE PROTECTION OF PERSONAL DATA

2.1. ENSURING SECURITY OF PERSONAL DATA

Our Company takes the necessary technical and organizational measures, in accordance with Article 12 of the Law on the Protection of Personal Data, to prevent the unlawful processing, access, transfer, or any other security breaches that may compromise personal data, and to ensure the safeguarding of such data, taking into account the nature of the personal data. In this context, our Company implements the administrative measures necessary to ensure an appropriate level of security and conducts, or has others conduct, the required audits in accordance with the guidelines published by the Personal Data Protection Board (the "**Board**").



2.2. PROTECTION OF SENSITIVE PERSONAL DATA

Under the Law on the Protection of Personal Data, Sensitive Personal Data are afforded special protection due to the risk that their unlawful processing may result in discrimination or other harm to individuals. Pursuant to Article 6 of the LPPD, Sensitive Personal Data include data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, criminal convictions and security measures, health, sexual life, and biometric and genetic data.

With respect to Sensitive Personal Data, our Company implements the technical and administrative measures adopted for the protection of personal data in accordance with the safeguards prescribed by the Personal Data Protection Board's Decision numbered 2018/10 and dated 31 January 2018, as further set out in the Sensitive Personal Data Processing Data Security Policy. Compliance with these safeguards is monitored and audited through the internal audits conducted by our Company.

Further information regarding the processing of Sensitive Personal Data is provided in Section 3.3 of this Policy.

2.3. RAISING AWARENESS AND CONDUCTING AUDITS WITHIN THE BUSINESS UNITS FOR THE PROTECTION AND PROCESSING OF PERSONAL DATA

Our Company ensures that the necessary training is provided to its business units in order to enhance awareness of the prevention of the unlawful processing of personal data, unlawful access to personal data, and the safeguarding of personal data.

The training and awareness activities organized by the Company are developed on the basis of the "Personal Data Security Guide" published on the official website of the Personal Data Protection Board.

Through these training and awareness activities, our Company aims to ensure that the personal data processing activities carried out by its employees in the performance of their duties are conducted in compliance with the LPPD and the secondary legislation.

Our Company establishes the necessary systems to raise awareness among both its existing employees and newly recruited employees regarding the protection of personal data and, where necessary, engages external consultants on matters relating to personal data protection. In this context, our Company evaluates participation in the relevant training programs, seminars, and information sessions and organizes additional training in parallel with amendments to the applicable legislation.

3. SECTION 3 - MATTERS RELATED TO THE PROCESSING OF PERSONAL DATA



3.1. PROCESSING PERSONAL DATA IN COMPLIANCE WITH THE PRINCIPLES STIPULATED IN THE LEGISLATION

3.1.1. Processing in line with the Law and Good Faith Principle

Personal data are processed in accordance with the general principles of trust and good faith, without prejudice to the fundamental rights and freedoms of individuals. In this context, Personal Data are processed only to the extent necessary for, and limited to, the conduct of our Company's business activities.



3.1.2. Ensuring that Personal Data are Accurate and, Where Necessary, Kept Up-To-Date

Our Company takes the necessary measures to ensure that personal data remain accurate and, where necessary, up to date throughout the period during which they are processed, and establishes the necessary mechanisms to periodically verify the accuracy and currency of such personal data.

3.1.3. Processing for Specific, Clear and Legitimate Purposes

Our Company clearly defines the purposes for which personal data are processed and processes such personal data solely for purposes that are related to and necessary for the conduct of its business activities.

3.1.4. Being Relevant, Limited, and Proportionate to the Purpose of Processing

Our Company collects personal data only to the extent and in the manner necessary for the conduct of its business activities and processes such personal data solely for the specified purposes.

3.1.5. Retaining Personal Data for the Period Prescribed by the Applicable Legislation or Required for the Purposes for Which They Are Processed

Our Company retains the personal data for the term required for their processing purpose and the minimum term set forth in the applicable legal legislation. In this connection, first of all our Company determines whether the applicable legislation provides for any term for the retention of personal data, and if such term has been determined, personal data are retained during such term. If there is no legal term, personal data are retained for the term required for the purpose of personal data processing. At the end of the determined retention periods, personal data are destroyed at periodic destruction intervals or upon the data subject's application and using the destruction method determined (deletion and/or destruction and/or anonymization).

3.2. CONDITIONS FOR PROCESSING PERSONAL DATA

Except where the data subject has given explicit consent, the legal basis for a personal data processing activity may be one or more of the conditions set out below. Accordingly, a single personal data processing activity may be based on one or more legal grounds. Where the personal data being processed constitute sensitive personal data, the conditions set out in Section 3.3 ("Processing of Sensitive Personal Data") of this Policy shall apply.

(i) Existence of the Explicit Consent of the Data Subject

One of the legal grounds for the processing of personal data is the explicit consent of the data subject. Such explicit consent must relate to a specific matter and must be given on the basis of prior information and the data subject's free will.



Where any of the legal grounds for processing personal data set out below applies, personal data may be processed without obtaining the data subject's explicit consent.

(ii) Being Expressly Prescribed by the Laws

Personal data may be processed where such processing is expressly provided for by law. In other words, this legal ground shall apply where the applicable law contains an express provision authorizing the processing of personal data.

(iii) Inability to Obtain Express Consent of the Data Subject Due to Actual Impossibility

Personal data of the data subject may be processed, if it is necessary to protect the life or physical integrity of the data subject or another person, and the data subject is physically incapable of giving consent, or his/her consent would not be considered to be valid.



(iv) **Direct Relationship with Conclusion or Performance of a Contract**

Personal data may be processed where such processing is necessary and directly related to the establishment or performance of a contract to which the data subject is a party.

(v) **Fulfillment of Legal Obligation by the Company**

Personal Data may be processed where such processing is necessary for our Company to comply with its legal obligations.

(vi) **Disclosure by the Data Subject of His/Her Personal Data to the Public**

Where the data subject has made his or her personal data public, such personal data may be processed only to the extent consistent with the purpose for which they were made public.

(vii) **Obligation to Process Data for Establishment or Protection of a Right**

Personal data of the data subject may be processed in case data processing is mandatory for establishing, exercising or protecting a right.

(viii) **Where Processing of Data is Mandatory for the Legitimate Interest of Our Company**

Personal data may be processed where such processing is necessary for the legitimate interests of our Company, provided that such processing does not prejudice the fundamental rights and freedoms of the data subject.

3.3. **PROCESSING OF SENSITIVE PERSONAL DATA**

As a general rule, the processing of Sensitive Personal Data is prohibited. However, as the Company, we process Sensitive Personal Data in accordance with the principles set out in this Policy where one or more of the following legal grounds specified in Article 6 of the LPPD applies:

(i) **Existence of the Explicit Consent of the Data Subject**

One of the legal grounds for the processing of sensitive personal data is the explicit consent of the data subject. Such explicit consent must relate to a specific matter and must be given on the basis of prior information and the data subject's free will.

Where any of the legal grounds for processing sensitive personal data set out below applies, personal data may be processed without obtaining the data subject's explicit consent.

(ii) **Being Expressly Prescribed by the Laws**



Sensitive personal data may be processed where such processing is expressly provided for by law. In other words, this legal ground shall apply where the applicable law contains an express provision authorizing the processing of sensitive personal data.

(iii) Inability to Obtain Express Consent of the Data Subject Due to Actual Impossibility

Sensitive personal data of the data subject may be processed, if it is necessary to protect the life or physical integrity of the data subject or another person, and the data subject is physically incapable of giving consent, or his/her consent would not be considered to be valid.



(iv) **Disclosure by the Data Subject of His/Her Sensitive Personal Data to the Public**

Where the data subject has disclosed his or her sensitive personal data to the public in accordance with his or her intention to do so, such sensitive personal data may be processed only to the extent consistent with the purpose for which they were made public.

(v) **Obligation to Process Data for Establishment or Protection of a Right**

Sensitive personal data of the data subject may be processed in case data processing is mandatory for establishing, exercising or protecting a right.

(vi) **Requirement of Processing by Persons under a Duty of Confidentiality Obligation or Authorized Institutions and Organizations for the Relevant Purposes**

Sensitive personal data may be processed by persons who are under a duty of confidentiality or by authorized institutions and organizations where such processing is necessary for the protection of public health, the practice of preventive medicine, medical diagnosis, the provision of treatment and care services, or the planning, management, and financing of healthcare services.

(vii) **Processing for the Fulfillment of Legal Obligations in the Fields of Employment, Occupational Health and Safety, Social Security, Social Services and Social Assistance.**

Sensitive personal data may be processed where such processing is necessary for compliance with legal obligations in the fields of employment, occupational health and safety, social security, social services, and social assistance.

(viii) **Processing by Foundations, Associations and Other Non-Profit Organizations or Organizations Established for Political, Philosophical, Religious or Trade Union Purposes**

Foundations, associations, and other non-profit organizations or organizations established for political, philosophical, religious, or trade union purposes may process the sensitive personal data of their current or former members, persons affiliated with them, or individuals who are in regular contact with such organizations or institutions, provided that such processing is carried out in accordance with the legislation to which they are subject and their purposes, is limited to their fields of activity, and that the personal data are not disclosed to third parties.

3.4. INFORMING THE DATA SUBJECT



In accordance with Article 10 of the LPPD and the secondary legislation, our Company informs data subjects of the identity of the data controller, the purposes for which their personal data are processed, the persons to whom and the purposes for which such personal data may be transferred, the methods and legal grounds for the collection of their personal data, and the rights they have with respect to the processing of their personal data.

3.5. TRANSFER OF PERSONAL DATA

For lawful personal data processing purposes, our Company may transfer the personal data and sensitive personal data of data subjects to third parties (including third-party companies, group companies, and third-party individuals), provided that the necessary security measures are implemented. In this context, our Company acts in compliance with Articles 8 and 9 of the LPPD.

3.5.1. Transfer of Personal Data to Third Parties Resident in Türkiye

Where one or more of the legal grounds for processing Personal Data (the "Legal Grounds for Processing") set out below applies, our Company may transfer personal data to third parties, provided that all necessary security measures, including those prescribed by the Personal Data Protection Board are duly implemented.

- The Data Subject has consented to the transfer of his or her personal data to third parties resident in Türkiye;*
- The transfer of the personal data is expressly provided for by law;*
- The transfer of the personal data by the Company is directly related to and necessary for the establishment or performance of a contract;*
- The transfer of the personal data is necessary for our Company to comply with its legal obligations;*
- The personal data have been made public by the data subject, provided that the transfer by our Company is limited to the purpose for which the personal data were made public;*
- The transfer of the personal data by the Company is necessary for the establishment, exercise, or protection of the rights of the Company, the data subject, or third parties;*
- The transfer of the personal data is necessary for the legitimate interests of the Company, provided that such transfer does not prejudice the fundamental rights and freedoms of the data subject; and*
- The transfer is necessary to protect the life or physical integrity of a data subject who is unable to give consent due to actual impossibility or whose consent cannot be legally recognized as valid, or of another person.*

3.5.2. Transfer of Personal Data to Third Parties Resident Abroad

The transfer of Personal Data abroad by our Company shall be carried out in accordance with Article 9 of the LPPD and the principles set out in this Policy, subject to the implementation of appropriate technical and administrative measures, as described below.

(i) Transfers Based on Adequacy Decision Regarding the Relevant



Country, International Organization or Sector within a Country

Personal Data may be transferred abroad by the Company where one of the legal grounds set out in Articles 5 and 6 of the Law applies and the Personal Data Protection Board has issued an adequacy decision in respect of the country, international organization, or sector within the country to which the transfer will be made.

Adequacy decisions are issued by the Board and published in the Official Gazette. Where deemed necessary, the Board may also obtain the opinions of the relevant institutions and organizations. An adequacy decision shall be reviewed at least once every four years. Following such review, or where otherwise deemed necessary, the Board may amend, suspend, or revoke the adequacy decision with prospective effect.

(ii) Transfers Subject to Appropriate Safeguards

In the absence of an adequacy decision, personal data may be transferred abroad by the Company where one of the legal grounds for processing personal data set out in Articles 5 and 6 of the LPPD applies, the data subject has the ability to exercise his or her rights and to seek effective legal remedies in the country to which the transfer is made, and one of the following appropriate safeguards is provided by the parties:

- **Specific Transfer Ground for Public Institutions and Institutions or Professional Organizations with Public Institution Status:** *The existence of an agreement, which is not classified as an international convention, between public institutions and organizations or international organizations abroad and public institutions and organizations or professional organizations with public institution status in Türkiye, and the Board's approval for the transfer;*

- **Binding Corporate Rules:** *The existence of binding corporate rules approved by the Board containing provisions on personal data protection, which the companies within a group of undertakings engaged in joint economic activities are obliged to comply with;*
- **Standard Contracts:** *The existence of a standard contract announced by the Board containing provisions regarding matters such as the categories of personal data, the purposes of the data transfer, the recipient and recipient groups, the technical and administrative measures to be implemented by the data recipient, and the additional safeguards applicable to sensitive personal data, provided that the Board is notified of such standard contract within the statutory time limits.*
- **Letter of Undertaking:** *The existence of a written commitment containing provisions to ensure adequate protection, and the Board's approval for the transfer;*

(iii) **Transfers Based on Occasional Circumstances**

In the absence of both an adequacy decision and any of the appropriate safeguards, personal data may be transferred abroad by the Company on an occasional basis, provided that one of the following circumstances applies:

- **Explicit Consent Based on Information Regarding the Possible Risks:** *The data subject has given explicit consent to the transfer, provided that they have been informed of the potential risks involved;*
- **Performance of a Contract and Pre-Contractual Measures:** *The transfer is necessary for the performance of a contract between the data subject and controller, or for the implementation of pre-contractual measures taken at the request of the data subject;*
- **Contracts Concluded for the Benefit of the Data Subject:** *The transfer is necessary for entering into a contract or performance of a contract between the controller and another natural or legal person for the benefit of the data subject;*
- **Overriding Public Interest:** *The transfer is necessary for an overriding public interest;*
- **Establishment, Exercise, or Protection of a Right:** *The transfer of personal data is necessary for the establishment, exercise, or protection of any right;*
- **Actual impossibility:** *Transfer of the personal data is absolutely necessary for the protection of life or bodily integrity of a person who is incapable of giving their consent due to physical impossibility or whose consent is legally invalid, or of another person.*
- **Transfers from Public Registers:** *The transfer is made from a publicly accessible registry or a registry accessible to persons with legitimate interest, provided that the conditions for accessing the registry under relevant legislation are met, and that the person with a legitimate interest has requested the transfer.*

3.5.3. Transfer of Sensitive Personal Data to Third Parties Resident in Türkiye

As a general rule, the transfer of sensitive personal data is prohibited. However, as the Company, we process sensitive personal data in accordance with the principles set out in this Policy where one or more of the following legal grounds specified in Article 6 of the LPPD applies:

(i) **Existence of the Explicit Consent of the Data Subject**



One of the legal grounds for the processing of sensitive personal data is the explicit consent of the data subject. Such explicit consent must relate to a specific matter and must be given on the basis of prior information and the data subject's free will.

Where any of the legal grounds for processing sensitive personal data set out below applies, personal data may be processed without obtaining the data subject's explicit consent.



- (ii) **Being Expressly Prescribed by the Laws**
Sensitive personal data may be processed where such processing is expressly provided for by law. In other words, this legal ground shall apply where the applicable law contains an express provision authorizing the processing of sensitive personal data.
- (iii) **Inability to Obtain Express Consent of the Data Subject Due to Actual Impossibility**
Sensitive personal data of the data subject may be processed, if it is necessary to protect the life or physical integrity of the data subject or another person, and the data subject is physically incapable of giving consent, or his/her consent would not be considered to be valid.
- (iv) **Disclosure by the Data Subject of His/Her Sensitive Personal Data to the Public**
Where the data subject has disclosed his or her sensitive personal data to the public in accordance with his or her intention to do so, such sensitive personal data may be processed only to the extent consistent with the purpose for which they were made public.
- (v) **Obligation to Process Data for Establishment or Protection of a Right**
Sensitive personal data of the data subject may be processed in case data processing is mandatory for establishing, exercising or protecting a right.
- (vi) **Requirement of Processing by Persons under a Duty of Confidentiality Obligation or Authorized Institutions and Organizations for the Relevant Purposes**
Sensitive personal data may be processed by persons who are under a duty of confidentiality or by authorized institutions and organizations where such processing is necessary for the protection of public health, the practice of preventive medicine, medical diagnosis, the provision of treatment and care services, or the planning, management, and financing of healthcare services.
- (vii) **Processing for the Fulfillment of Legal Obligations in the Fields of Employment, Occupational Health and Safety, Social Security, Social Services and Social Assistance.**
Sensitive personal data may be processed where such processing is necessary for compliance with legal obligations in the fields of employment, occupational health and safety, social security, social services, and social assistance.



(viii) **Processing by Foundations, Associations and Other Non-Profit Organizations or Organizations Established for Political, Philosophical, Religious or Trade Union Purposes**

Foundations, associations, and other non-profit organizations or organizations established for political, philosophical, religious, or trade union purposes may process the sensitive personal data of their current or former members, persons affiliated with them, or individuals who are in regular contact with such organizations or institutions, provided that such processing is carried out in accordance with the legislation to which they are subject and their purposes, is limited to their fields of activity, and that the personal data are not disclosed to third parties.

3.5.4. Transfer of Sensitive Personal Data to Third Parties Resident Abroad

The transfer of sensitive personal data abroad by our Company shall be carried out in accordance with Article 9 of the LPPD and the principles set out in this Policy, subject to the implementation of appropriate technical and administrative measures, as described below.



(i) **Transfers Based on Adequacy Decision Regarding the Relevant Country, International Organization or Sector within a Country**

Personal Data may be transferred abroad by the Company where one of the legal grounds set out in Articles 5 and 6 of the LPPD applies and the Personal Data Protection Board has issued an adequacy decision in respect of the country, international organization, or sector within the country to which the transfer will be made.

Adequacy decisions are issued by the Board and published in the Official Gazette. Where deemed necessary, the Board may also obtain the opinions of the relevant institutions and organizations. An adequacy decision shall be reviewed at least once every four years. Following such review, or where otherwise deemed necessary, the Board may amend, suspend, or revoke the adequacy decision with prospective effect.

(ii) **Transfers Subject to Appropriate Safeguards**

In the absence of an adequacy decision, personal data may be transferred abroad by the Company where one of the legal grounds for processing personal data set out in Articles 5 and 6 of the LPPD applies, the data subject has the ability to exercise his or her rights and to seek effective legal remedies in the country to which the transfer is made, and one of the following appropriate safeguards is provided by the parties:

- **Specific Transfer Ground for Public Institutions and Institutions or Professional Organizations with Public Institution Status:** *The existence of an agreement, which is not classified as an international convention, between public institutions and organizations or international organizations abroad and public institutions and organizations or professional organizations with public institution status in Türkiye, and the Board's approval for the transfer;*
- **Binding Corporate Rules:** *The existence of binding corporate rules approved by the Board containing provisions on personal data protection, which the companies within a group of undertakings engaged in joint economic activities are obliged to comply with;*
- **Standard Contracts:** *The existence of a standard contract announced by the Board containing provisions regarding matters such as the categories of personal data, the purposes of the data transfer, the recipient and recipient groups, the technical and administrative measures to be implemented by the data recipient, and the additional safeguards applicable to sensitive personal data, provided that the Board is notified of such standard contract within the statutory time limits.*
- **Letter of Undertaking:** *The existence of a written commitment containing provisions to ensure adequate protection, and the Board's approval for the transfer;*

(iii) **Transfers Based on Occasional Circumstances**

In the absence of both an adequacy decision and any of the appropriate safeguards, personal data may be transferred abroad by the Company on an occasional basis, provided that one of the following circumstances applies:



- **Explicit Consent Based on Information Regarding the Possible Risks:** *The data subject has given explicit consent to the transfer, provided that they have been informed of the potential risks involved;*
- **Performance of a Contract and Pre-Contractual Measures:** *The transfer is necessary for the performance of a contract between the data subject and controller, or for the implementation of pre-contractual measures taken at the request of the data subject;*
- **Contracts Concluded for the Benefit of the Data Subject:** *The transfer is necessary for entering into a contract or performance of a contract between the controller and another natural or legal person for the benefit of the data subject;*
- **Overriding Public Interest:** *The transfer is necessary for an overriding public interest;*



- **Establishment, Exercise, or Protection of a Right:** *The transfer of personal data is necessary for the establishment, exercise, or protection of any right;*
- **Actual impossibility:** *Transfer of the personal data is absolutely necessary for the protection of life or bodily integrity of a person who is incapable of giving their consent due to physical impossibility or whose consent is legally invalid, or of another person.*
- **Transfers from Public Registers:** *The transfer is made from a publicly accessible registry or a registry accessible to persons with legitimate interest, provided that the conditions for accessing the registry under relevant legislation are met, and that the person with a legitimate interest has requested the transfer.*

4. **SECTION 4 - CLASSIFICATION OF THE PERSONAL DATA PROCESSED BY OUR COMPANY AND THE PURPOSES OF PROCESSING**

At our Company, Personal Data are processed after informing the data subjects in accordance with Article 10 of the LPPD and the secondary legislation, for the personal data processing purposes of our Company, based on and limited to at least one of the Legal Grounds for Processing set out in Articles 5 and 6 of the LPPD, and in compliance with the general principles prescribed under the LPPD, in particular the principles set out in Article 4 governing the processing of personal data.

5. **SECTION 5 - RETENTION AND DESTRUCTION OF PERSONAL DATA**

Our Company retains the personal data for the term required for their processing purpose and the minimum term set forth in the applicable legal legislation. First of all, our Company determines whether the applicable legislation provides for any term for the retention of personal data, and if such term has been determined, personal data are retained during such term. If there is no legal term, personal data are retained for the term required for the purpose of personal data processing.

The personal data processed by our Company are classified by category, and maximum retention periods have been determined for each category of personal data. These retention periods are set out in the table contained in our Company's Personal Data Retention and Destruction Policy. At the end of the determined maximum retention periods, personal data are destroyed at periodic destruction intervals or upon the data subject's application and using the destruction method determined (deletion and/or destruction and/or anonymization).

6. **SECTION 6- RIGHTS OF DATA SUBJECTS AND THE EXERCISE OF SUCH RIGHTS**

6.1. **RIGHTS OF THE DATA SUBJECT**

Data subjects are entitled to:

- (1) *learn whether any personal data is processed;*
- (2) *if their personal data are processed, request information on such processing;*
- (3) *learn the processing purpose of the personal data and whether such data are*



- used for the intended purpose;*
- (4) learn the identity of third parties to whom personal data are transferred in or out of the country;*
 - (5) request correction of any personal data which is processed incompletely or inaccurately, and request this correction to be communicated to third parties to whom personal data was transferred;*
 - (6) in the event the reasons for processing personal data cease to exist, although such data had been processed in compliance with the LPPD and other applicable legal provisions, request personal data to be deleted or destroyed, and request third parties to whom personal data were transferred to be informed of this operation;*



- (7) *file an objection against an outcome which is against their interest, as a result of analysis of the processed data exclusively with automated systems, and*
- (8) *claim compensation of any damages suffered as a result of unlawful processing of the personal data.*

6.2. EXERCISE OF THE RIGHTS OF THE DATA SUBJECT

Data Subjects may submit their requests regarding the rights listed in Section 6.1 ("Rights of the Data Subject") to our Company using the methods prescribed by the Board. For this purpose, they may use the "Data Subject Application Form," available at <https://koton.mncdn.com/static/KotonVeriSahibiBasvuruFormuCEBTS.pdf>.

6.3. OUR COMPANY'S RESPONSE TO REQUESTS

Our Company implements the necessary administrative and technical measures to ensure that requests submitted by data subjects are processed in accordance with the LPPD and the secondary legislation.

Where a data subject submits to our Company, in accordance with the applicable procedure, a request relating to the rights set out in Section 6.1 ("Rights of the Data Subject"), our Company shall respond to such request as soon as possible and, in any event, within thirty (30) days, free of charge, depending on the nature of the request. However, where processing the request requires an additional cost, a fee may be charged in accordance with the tariff determined by the Board.