



## PERSONAL DATA PROTECTION POLICY

In accordance with the Law on the Protection of Personal Data No. 6698 ("KVKK"), your personal data will be processed by our Company, acting as the Data Controller, within the framework described below, for business-related purposes, by means of being used, recorded, stored, updated, transferred and/or classified. In this regard, in order to protect individuals' fundamental rights and freedoms—particularly the right to privacy—and to comply with the laws and regulations issued for the protection of personal data, our Company takes all necessary technical and administrative measures to ensure an appropriate level of security to prevent the unlawful processing, unlawful access, or loss of your personal data.

The target audience of this text consists of all natural persons whose personal data are processed by our Company, excluding our employees and job applicants who have applied to our Company.

Personal data processed in the capacity of Data Controller include, but are not limited to, the following: Name, surname, Turkish ID number, address, phone number, e-mail address, signature, physical location/security camera footage, call centre/service quality voice recordings, bank account number, and cookie records.

### **Purposes and legal grounds for processing personal data:**

The personal data you have shared may be processed by our Company for the following purposes, including but not limited to:

- To enable you and/or the institutions or organisations you represent to benefit from the products and services offered by our Company; to determine and implement the commercial and business strategies of our Company; to carry out marketing, business development and planning activities;
- To conduct administrative operations related to communication carried out by our Company;
- To ensure and audit the physical security of locations operated by our Company;
- To establish business partner/customer/supplier (authorised person or employees) relationships;
- To fulfil contractual obligations and financial reconciliation requirements regarding products and services provided jointly with our business partners, suppliers or other third parties;
- To execute our Company's human resources policies;
- To process data when our Company's call centre is contacted, or when the website is used; and/or
- To manage participation in training, seminars or events organised by our Company.

### **Method of collection and storage of personal data:**

The personal data you share with our Company may be collected verbally, in writing, or electronically, through automatic or non-automatic means, via offices, branches, call centres, websites, social media platforms, mobile applications and similar channels. Your personal data will be stored in electronic and/or physical environments. To prevent unauthorised access, manipulation, loss, or damage to your personal data obtained and stored by our Company, the necessary business process designs and technical security infrastructure improvements are implemented.

Your personal data will be processed and stored by taking all necessary information security measures, without being used beyond the notified purposes and scope, for the duration required by the legal retention period, or, if no such period is specified, for as long as required by the purpose of processing. When this period expires, your personal data will be removed from our Company's data flows through deletion, destruction, or anonymisation.

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**Transfer of personal data:**

Your personal data may be transferred, in accordance with the laws and other regulations and for the purposes stated above, to:

Türk Telekomünikasyon A.Ş. and Türk Telekomünikasyon group companies;

Companies and representatives authorised to act on behalf of and in the name of our Company;

Regulatory and supervisory authorities, and public institutions or organisations that are legally authorised to request your personal data;

Business partners, suppliers, subcontractors, banks, credit risk and financial institutions, and other natural or legal persons, within the scope of the purposes specified;

Tax and similar advisors, persons, institutions and organisations required for legal proceedings, auditors and consultants we receive services from—both domestically and abroad—for the purposes mentioned above.

**Your rights under Article 11 of the KVKK:**

By applying to our Company, you have the right to:

- Learn whether your personal data are processed,
- Request information if your personal data have been processed,
- Learn the purpose of the processing and whether they are used in accordance with this purpose,
- Know the third parties to whom your personal data are transferred domestically or abroad,
- Request correction of incomplete or inaccurate personal data,
- Request deletion or destruction of your personal data within the framework of the conditions set out in Article 7 of the KVKK,
- Request notification to third parties to whom personal data have been transferred regarding the actions taken under the above subparagraphs (e) and (f),
- Object to the emergence of a result to your detriment by means of analysis exclusively through automated systems,
- Request compensation for damage arising from the unlawful processing of your personal data.

Pursuant to Article 13, paragraph 1 of the KVKK, you may submit your request to exercise your rights stated above to our Company in writing or through other methods determined by the Personal Data Protection Board. To exercise your rights listed above, you may deliver your signed request including information verifying your identity to our Company in person, send it via notary public or through other methods specified by the Personal Data Protection Board, or send it with a secure electronic signature to the address [info@arkengroup.com](mailto:info@arkengroup.com)

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