

CLARIFICATION TEXT ON PROCESSING PERSONAL DATA

We, as **DEVA Holding A.Ş. (“Company”)**, process personal data of our webpage visitors, customers and members in accordance with the Law on Personal Data Protection No. 6698, legal regulation and the decrees of the Personal Data Protection Board. We would like to inform you of the way we collect your personal data, purpose of processing, legal reasons and your rights.

1. What is personal data, who process personal data?

Personal data means any information which relates to an identified or identifiable natural person as per the article 3 of the Law on Personal Data Protection No. 6698 (“Law”). **DEVA HOLDİNG A.Ş. (“Company”)** shall record, keep, update, process, explain and transfer to third parties in the capacity of “*data controller*” as per the Law on Personal Data Protection No. 6698.

2. What are the legal reasons and the methods of collecting your personal data?

Your personal data, contact, membership and quasi online forms at the webpage of DEVA (your information including feedback that you add with your own consent, in addition to the information required by the aforesaid forms), your information that you share with our call centers may be collected by data processor natural or legal persons who are authorized by DEVA through e-mail, telephone, webpage, miscellaneous agreements, forms and records being kept as hard copy with automatic or non-automatic methods, verbally, in writing or electronically for the conditions and legal reasons set forth in the articles 5 and 6 of the Law.

3. For what purposes can your personal data be processed?

Your collected personal data may be processed by DEVA within the scope of personal data processing conditions set forth in the article 5 and 6 of the Law on Personal Data Protection for the following purposes;

- To conduct the activities of DEVA in compliance with the relevant regulation and the policies of DEVA,
- To provide better service to our webpage users and to enhance our services,
- To carry out goods/services offer, advertisement-promotion, special offer, sale and marketing activities and to provide information,

- To be able to conduct improvement activities by us or our community companies for our customer's points of interest and preferences,
- To have our business units to prepare orders, conduct deliveries and necessary processes,
- To assure legal and commercial security of DEVA, its affiliates and those who have contacted or are now in contact with DEVA for business purposes,
- To have our business units to perform necessary works in order for you to benefit from goods, services or commercial activity provided by DEVA,
- To determine and implement commercial and business strategies of DEVA.

4. To whom and for what purposes can your personal data be transferred?

Your collected personal data may be transferred to our affiliates, suppliers and legally authorized public institutions in accordance with the conditions of transferring personal data prescribed in the articles 8 and 9 of the Law on Personal Data Protection, in an attempt to;

- To conduct the activities of the Company in compliance with the relevant regulation and the policies of the Company,
- To provide better service to our webpage users and to enhance our services,
- To carry out goods/services offer, advertisement-promotion, special offer, sale and marketing activities and to provide information,
- To be able to conduct improvement activities by us or our community companies for our customer's points of interest and preferences,
- To have our business units to prepare orders, conduct deliveries and necessary processes,
- To assure legal and commercial security of DEVA, its affiliates and those who have contacted or are now in contact with DEVA for business purposes,
- To have our business units to perform necessary works in order for you to benefit from goods, services or commercial activity provided by DEVA,
- To determine and implement commercial and business strategies of DEVA.

5. What are your rights pursuant to the Law?

Within the scope of the article 11 of the Law, you, as a data owner, have a right to;

- Learn whether or not your personal data have been processed;

- Request information as to processing if your data have been processed;
- Learn the purpose of processing of your personal data and whether data are used in accordance with their purpose;
- Know the third parties in the country or abroad to whom personal data have been transferred;
- Request rectification in case personal data are processed incompletely or inaccurately and request notification of the rectification to third parties to whom personal data have been transferred;
- Request deletion or destruction of personal data and request notification of this action to third parties to whom personal data have been transferred within the framework of the conditions set forth under article 7, excluding legal boundaries;
- Object to occurrence of any result that is to your detriment by means of analysis of personal data exclusively through automated systems;
- Request compensation for the damages due to unlawful processing of your personal data.

6. How can you exercise your rights granted by the Law?

You may exercise your abovementioned rights by submitting to our Company in writing and with your original signature or through a registered electronic mail address, secure electronic address, mobile signature or by a relevant person by using the electronic mail address which has been notified and registered in our system. As for written applications, the application address is “*Halkalı Merkez Mah. Basın Ekspres Caddesi No: 1 34303 Küçükçekmece/İstanbul*”. The mandatory information to be included in your application in minimum are as follows;

- Name, surname and signature, if application is in writing,
- TR ID Number for Turkish citizens; nationality, passport number or identification number if any for foreigners,
- Residential or workplace address for notification,
- E-mail address, telephone and fax numbers if any for notification,
- Subject of request

Furthermore, relevant information and documents should be attached to the application. You may apply through the Application Form in our webpage. In case a person makes a

request on behalf of the personal data owner, a special power of attorney relating to the matter granted by the personal data owner to the applicant should be issued.

Applications which are forwarded to our Company in due form shall be finalized within thirty days at the latest with no charge. In case a reply exceeds ten pages, 1 Turkish Lira may be charged as a transaction fee for each page exceeding ten pages. In case a reply is given through a CD or flash disk, the cost of data recording medium may be demanded.

The company may request additional information, if necessary, in order to determine whether an applicant is the personal data owner and to assess the requests, and may address questions to the personal data owner concerning the application in order to clarify the matters stated in the application.