

## **IC İBRAHİM ÇEÇEN INVESTMENT HOLDİNG A.Ş.**

### **DISCLOSURE ON THE PROCESSING OF YOUR PERSONAL DATA**

As IC İbrahim Çeçen Investment Holding A.Ş. ("**Company**"), we attach great importance to ensuring the security of your personal data. In this context, in accordance with the Law No. 6698 on the Protection of Personal Data ("**PDP Law**"), we take the necessary measures to prevent unlawful processing of your personal data and unlawful access to your personal data, and to ensure the appropriate level of security to ensure the protection of your personal data during the processing and transfer of your personal data to third parties. This text is therefore intended to inform the persons concerned.

This text will be updated in the event that all or certain articles of this text issued by our Company are amended.

#### **1. THE PERSON WHO PROCESSES YOUR DATA:**

**As the Company, we are the legal entity responsible for the establishment and management of the data recording system which determines the purposes and means of processing of your personal data.** Our Company will start to process your personal data by ensuring data security with your explicit consent for the processing of your personal data or with the information we will provide in cases where your explicit consent is not required. When processing your personal data, we may also process your personal data by authorizing one or more data processors after ensuring the necessary level of security.

#### **2. LEGAL BASIS FOR THE PROCESSING OF YOUR PERSONAL DATA, METHODS BY WHICH DATA MAY BE OBTAINED AND YOUR PERSONAL DATA THAT WILL BE PROCESSED:**

Your personal data will be used by our Company in accordance with the provisions of the relevant legislation in order to provide the services to be performed and to improve the quality of these services, to undertake the activities stipulated and/or exempted by public authorities, to undertake the activities of the Company, and to comply with information storage, reporting and information obligations. In addition, one/several or all of your personal data listed in **Annex-1** may be processed in order to enable you to visit our Company, to protect the security and legitimate interests related to your visit, to offer our Company's products and services, to communicate regarding the product and service you have received/will receive in this regard, to offer services related to our Company's fields of activity such as product/service offer, modeling, reporting, scoring, risk monitoring and to improve the quality of these services and to undertake other activities, and to comply with information obligations.

For this purpose, we may share your personal data that we process with our affiliates, business partners, suppliers, company officials, shareholders, group companies and legally authorized public institutions and private persons in Turkey and abroad.

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### **3. SHARING YOUR PERSONAL DATA:**

Your personal data may be collected verbally, in writing or electronically by our Company, our affiliates, business partners, employees, through our website, social media accounts and all other channels in accordance with the provisions of the relevant legislation.

This information form is an annex and an integral part of any contract you have signed with our Company and your requests for service procurement.

### **4. DESTRUCTION OF YOUR PERSONAL DATA:**

Our Company stores your processed personal data for the periods determined by the legislation. However, in the event that the legislation regarding the storage period of your personal data does not specify a specific period, your personal data is stored for the period required for processing in accordance with our Company's practices and commercial customs depending on the services provided by our Company while processing said data, and after this period, only for the periods required in practice to constitute evidence in possible legal disputes. After the expiration of the specified periods, your personal data in question is deleted, destroyed or anonymized on the first destruction date in accordance with Article 7 of the PDP Law.

### **5. YOUR RIGHTS REGARDING THE PROCESSING OF YOUR PERSONAL DATA:**

Within the framework of Article 11 of the PDP Law, you may submit the following requests to us by applying to our Company;

- a. Learn whether your personal data has been processed or not, and if processed, to request information about it,
- b. Learn the purpose of the processing of your personal data and whether it is used for intended purposes,
- c. Learn about the third parties inside or outside the country to which your personal data is transferred,
- d. Request the correction of the processed personal data if it is incomplete or inaccurate,
- e. Request the deletion, destruction or anonymization of your personal data in case the reasons requiring the processing of your personal data within the scope of Article 7 of the PDP Law disappear,
- f. Request notification of the transactions made pursuant to subparagraphs (d) and (e) to third parties to whom your personal data have been transferred,
- g. Object to any unfavorable outcomes against you since the processed data was exclusively analyzed by automated systems,
- h. Request compensation for your damages in case you incur damages due to the processing of your personal data in violation of the law.

You may exercise your above-mentioned rights in accordance with the provisions of the PDP Law and the Communiqué on the Procedures and Principles of Application to the Data Controller published on March 10, 2018 and the relevant current legislation by using the application form at [www.icholding.com.tr](http://www.icholding.com.tr);

- a. By applying in person to Kızılırmak Sokak No:31 Kızılay/Ankara with a wet-signed petition or sending a petition to the said address through a notary public,
- b. Sending an e-mail to [icholding@hs02.kep.tr](mailto:icholding@hs02.kep.tr) via Registered Electronic Mail.

Below, you will find information on how your applications will be delivered to us, specific to the application channels.

<b>Application Method</b>	<b>Application Address (<i>in cases of changes to the address, the last address published in the Trade Registry Gazette should be taken into account</i>)</b>	<b>Information to be Specified in the Application</b>
Application in Person (The Applicant applies in person with a document certifying his/her identity)	Kızılırmak Sokak No:31  Kızılay /Ankara	The envelope should read “Information Request within the Scope of Personal Data Protection Law”.
Notification through Notary Public	Kızılırmak Sokak No:31  Kızılay/Ankara	The notification envelope should read “Information Request within the Scope of Personal Data Protection Law”.
Via Registered Electronic Mail (KEP)	<a href="mailto:icholding@hs02.kep.tr">icholding@hs02.kep.tr</a>	The subject line of the e-mail should read “Information Request within the Scope of Personal Data Protection Law”.

In order for a person other than the data subject to submit a request, there must be a notarized special power of attorney obtained by the person concerned in the name of the person who will make the application.

Your requests that are duly submitted to our Company will be finalized **within thirty days at the latest**. In the event that the finalization of your requests in question requires an additional cost, our Company will charge the applicant the fee in the tariff determined by the Personal Data Protection Board (“Board”). If

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our Company responds to your application on a recording medium such as CD, flash memory, etc., a fee determined not to exceed the cost of the recording medium may be requested.

Our Company may request the necessary information and documents from you in order to determine whether you are the real owner of the personal data subject to the request and may ask you questions about your application in order to clarify the matters specified in your application.

Our Company may reject your application by explaining its reasoning in the following cases:

- Processing of personal data for purposes such as research, planning and statistics by anonymizing them with official statistics.
- Processing of your personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public security, public order, economic security, privacy of private life or personal rights or does not constitute a crime.
- Processing of your personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public security, public order or economic security.
- Processing of your personal data by judicial authorities or enforcement authorities in relation to investigations, prosecutions, trials or execution proceedings.
- The processing of your personal data is necessary for the prevention of crime or criminal investigation.
- Processing of your personal data made public by you.
- Processing of your personal data is necessary for the execution of supervisory or regulatory duties and disciplinary investigation or prosecution by the assigned and authorized public institutions and organizations and professional organizations in the nature of public institutions based on the authority granted by law.
- Processing of your personal data is necessary for the protection of the economic and financial interests of the State in relation to budgetary, tax and fiscal matters.
- Your request is likely to interfere with the rights and freedoms of other persons.
- You have made demands that require disproportionate effort.
- The information you request is publicly available.

Our Company will notify you of its response to your request in writing or electronically. Pursuant to Article 14 of the PDP Law, if your application is rejected, if you find the answer given by our Company insufficient or if your application is not responded within the specified time limit, you may file a complaint to the Board within 30 (thirty) days from the date you learn the answer of our Company or within 30 (thirty) days from the date of the end of our response period if we do not respond, and in any case within 60 (sixty) days from the date of application.

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**ANNEX-1: Personal Data Categories**

<b>Identity information</b>	All information that clearly belongs to an identified or identifiable natural person and is processed partially or completely automatically or non-automatically as part of the data recording system, and is contained in documents such as Driver's License, Identity Card, Residence, Passport, Lawyer ID and Marriage Certificate
<b>Contact information</b>	Information such as telephone number, address and e-mail, which clearly belongs to an identified or identifiable natural person and is processed partially or completely automatically or non-automatically as part of the data recording system
<b>Information on the security of physical space</b>	Personal data that clearly belong to an identified or identifiable natural person and are included in the data recording system, and are related to the records and documents kept and obtained during entrance to the physical space and during the stay in the physical space
<b>Information on process security</b>	Your personal data, which clearly belong to an identified or identifiable natural person and are included in the data recording system, and are processed for the purposes of ensuring the fulfilment of technical, administrative, legal and commercial obligations while conducting our commercial activities
<b>Risk management information</b>	Personal data that clearly belong to an identified or identifiable natural person and are included in the data recording system, and are processed employing methods used in accordance with generally accepted legal and commercial customs and good faith in these areas in order to manage our commercial, technical and administrative risks
<b>Financial information</b>	Personal data of the subcontractor, supplier official or employee regarding the information, documents and records showing all kinds of financial results of the person concerned, which clearly belong to an identified or identifiable natural person, processed partially or completely automatically or non-automatically as part of the data recording system