

EKOM ECZACIBAŞI DIŞ TİCARET A.Ş.
POLICY ABOUT PROTECTION AND PROCESSING OF PERSONAL
DATA

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Ekom Eczacıbaşı Dış Ticaret A.Ş.

Policy about Protection and Processing of Personal Data

This Policy of Ekom Eczacıbaşı Dış Ticaret A.Ş. for the Protection and Processing of Personal Data (“**Policy**”), contains the declarations and explanations of Company regarding the processing of personal data of real people other than company employees, mainly being related with employee candidates and customers by Ekom Eczacıbaşı Dış Ticaret A.Ş. (“**Company**”) within scope of Law for the Protection of Personal Data (“**Law**”).

Our company reserves the right to make changes in the policy with the aim to provide current information about our applications relating with the protection of personal data and about legal arrangements. If the changes that are made in the policy are major changes, data owners will be informed through various channels.

Particulars relating with the processing of personal data belonging to the employees whose personal data have been processed by our company are arranged within context of Policy of Ekom Eczacıbaşı Dış Ticaret A.Ş. for the Protection and Processing of Personal Data of Employees.

Definitions relating with concepts being used within scope of this policy have been specified in Appendix 1 by also considering the legislation for protection of personal data.

1) Principles relating with confidentiality of data

Our company acts in compliance with below explained general principles within scope of all personal data processing activities.

Acting in conformity with the laws and rules of honesty: Our company acts in conformity with the legislation in force and they comply with rules of honesty during the processing of all types of personal data.

Correctness and being updated: Our company provides opportunity for data owners to update their personal data and they take necessary measures for the correct transfer of data to the databases.

Processing for specific, clear and legitimate purposes: Our company limits personal data processing activities with specific and legitimate purposes and they inform data owners about said purposes with clarification texts.

Being limited, restrained and bound with the purpose of processing: Personal data are processed by our company for the purpose which has been notified to data owner at the time the data were obtained, as being bound with this purpose in a limited and restrained way as required.

Keeping them for period being foreseen in relevant legislation or as required for relevant purpose: If a certain period is determined by the legislation in force, our company will keep the personal data for this specified period. If such a period is not specified in the legislation, by considering purpose of data usage and our company procedures, reasonable periods of keeping data are determined and data are kept as being limited with this period. Following the ending of said periods, data are erased, destroyed as per our company procedures or they are made anonymous.

2) Your Personal Data being Collected

Your personal data being collected by our company changes as per the quality of relationship with our company and in accordance with legal liabilities.

Your personal data being collected can be listed as below :

- Identity information (T.R.ID number, name-last name, passport number, information written on the card if registry card is shared, photograph etc. to show variations as required).
- Communication information (E-mail address, telephone number, mobile phone number, address etc.)
- Location data (location information being obtained while our services relating with the person are used especially in mobile applications or while our company devices are used.)
- Customer information (Customer number, customer income information, customer occupation information, vehicle plate no, information relating with the vehicle, education information etc. being related with the person .)
- Information about family members and relatives (Especially identity information, communication information, professional and education information of children and spouses of data owners, as relating with employee candidates.)
- Customer transaction information (CDR (call detail record), call center records, credit card extract, cash desk receipts, customer instructions, records being registered at relevant channels depending on an instruction or request relating with the person.)
- Physical space security information (Entrance-exit records, visiting information, camera records etc.)
- Transaction safety information (Internet site password and cipher information)
- Risk management information (KKB query results and records, registry system records, IP address monitoring records being related with personal data owner.)
- Financial information (Credit card debt, credit amount, credit payments, interest amount to be paid and the interest rate, debt balance amount, receivable balance amount in line with information coming from official authorities in case there is a legal proceeding.)
- Information about employee candidate (Curriculum vitae, interview notes, personal test results.)
- Legal processing and compliance information (Data being stated on documents such as court and administrative authority decisions etc.)
- Auditing and Inspection information (Information relating with all types of records and processes for our asserting our rights and legal follow up relating with data owner)
- Personal data with private quality (Information about memberships at associations, foundations or unions, data relating with health, data relating with criminal sentence and security measures)
- Request/complaint management information (Information being collected relating with requests and complaints that are submitted to our company regarding products and services relating with person, relevant records and information about reports for evaluating their outcomes by relevant business divisions etc.)
- Reputation management information (Information being related with person, that are collected to protect commercial reputation of our company)
- Visual and aural data (Photos, camera records, aural records etc.)

Mentioned types of personal data do not cover all data being processed and personal data being similar to the mentioned data can be processed by our company.

3) Our purposes for processing personal data

Your personal data being obtained could be processed within scope of personal data processing conditions which are stated in 5th and 6th articles of law, within context of purposes such as the ones given below:

- Within scope of fictionalization, coordination, development, and execution of company specific commercial activities and planning and execution of activities for business development;
 - o Realizing notification of legally required processes/records, execution of liabilities, communication with official institutions, giving information to authorized institutions, establishment and execution of contracts, management, planning, and execution of customer relations and realization of after-contract services
 - o Follow up, planning and execution of activities relating with obtaining outsource services/ consultancy etc.
 - o Planning, follow up and execution of activities relating with finance and accounting
 - o Execution of strategic planning activities
 - o Realization, planning and execution of activities/developments and analysis relating with system accessing
 - o Planning and execution of information technologies and data security activities
 - o Planning and execution of activities relating with development, follow up and controlling of commercial businesses, works and operations
 - o Realizing the works relating with activities such as controlling, data management, analysis, activities with social purposes, process improvement and similar ones and execution of relevant reports
 - o Planning and execution of activities relating with crisis and emergency case management
 - o Planning and execution of works relating with physical/electronic security of company
- Within scope of privatization of products and services as per people and fictionalization and execution of activities relating with profiling, introduction and marketing ;
 - o Planning and execution of actions aiming to improve level of perception about institutions, institutional activities and brands
 - o Planning and execution of operations relating with advertisements, sales and marketing aiming for customers
 - o Planning, management and execution of organizations, meetings, invitations and events
 - o Realization of loyalty, profiling, satisfaction works and analysis relating with products and services
 - o Planning and execution of campaigns and promotions being special for customers/ participants
 - o Analyzing usage habits and tendencies of customer/participants and planning and executing the activities for developing products and services and/or for privatizing them as per the customers
 - o Planning and execution of market research activities relating with products and services
- Within scope of fictionalization and/or execution of after-sales processes and request and complaint management;
 - o Planning and execution of request and complaint management activities for obtaining, evaluating and finalizing the requests and complaints
 - o Realization of operation, research, analysis and reporting activities for establishing contract relationship with customers or for renewing the contracts
 - o Realization and follow up of processes and activities for fulfillment of liabilities originating from after-sales services and contractual relations
- Within scope of planning, execution and management of corporate relations;
 - o Management, development, planning and execution of relations with suppliers/ dealers/business partners
 - o Planning and execution of operations relating with vehicle users and fulfillment of activities and requirements for the establishment and execution of vehicle leasing contracts
 - o Fictionalization, development and execution of corporate management and communication activities

- o Planning and/or execution of activities for ensuring continuity
- o Planning and execution of activities such as training outside the company/providing scholarships/providing support
- o Execution of strategic planning activities
- Within the scope of realization of activities for ensuring legal, technical and commercial-business security of company and people having business relationship with the company and for execution of legal liabilities;
 - o Planning and execution of organizational structuring, follow up and works for realization of company activities in accordance with company policies, directives, main contract and relevant legislation
 - o Execution of activities and liabilities for giving information to authorized institutions and associations regarding legal liabilities and/or relating with inspections
 - o Ensuring security of physical and/or electronic environments of company and its settlement areas and the parties with whom the company has relations
 - o Keeping records of people participating in organizations and events
 - o Keeping records relating with parties with whom the company has relations and planning and execution of listing works.
 - o Execution of activities to ensure that data are kept as correct and updated
 - o Planning and/or execution of work health and/or safety processes
 - o Planning and execution of operations and works relating with all types of visitors entering to and existing from the company in conformity with legal particulars
 - o Organization, planning, execution and inspection of works regarding commercial safety of company and/or people with whom the company has business relationships.

4) Keeping personal data

While our company determines periods for keeping personal data, they specify them by considering the legislation in force and purposes of processing data being the subject of processing. Within this context, if there are any time out periods and legal liabilities relating with personal data processing activities, they should be absolutely considered. If the purpose of processing personal data is eliminated, as long as there are no other legal reasons or grounds for keeping personal data, data are being erased, destroyed or they are made anonymous.

5) Transfer of personal data

Your personal data could be shared with our suppliers and business partners with whom we are collaborating within domestic country or abroad and from whom we obtain services and support, as including the parties providing products or services to our company or in the name of our company, and covering the aim to make you benefit from the products and services. Your personal data could also be shared with authorized public institutions and private people within scope of their authorizations. In such cases where your personal data are shared, our company takes necessary measures to ensure that the party to whom data are transferred realizes processing and transfer activities in accordance with the rules being stated in this policy and as per the provisions of legislation.

Your personal data could also be the subject of transfer if our company is taken over or merges either partially or completely by means of share sales, or if our company is subject to uniting, being divided or type changes. In this respect, if your personal data are transferred, necessary measures will also be taken to ensure that the party to whom data are transferred, acts in conformity with the processing and transfer rules that are stated in this policy.

Transfer of your personal data to abroad shall only be realized;

- If you have given your explicit consent or,
- If one or a few of the other data processing conditions being specified in the law are met;
 - o If there is sufficient protection in the country where data are transferred or,
 - o In case there is no adequate protection in the country where your data are transferred, our Company's giving written commitment together with the data official in relevant foreign country for ensuring sufficient protection and on condition of obtaining the permit of Personal Data Protection Council.

6) Data safety

Our company takes reasonable technical and administrative measures to avoid unauthorized access risks, accidental losses of data, intentional erasure of data or their being damaged for ensuring safety of your personal data.

Within this context, our company;

- Keeps personal data accesses as recorded,
- Ensures data safety by using software and hardware containing virus protection systems and security walls,
- Realizes follow up of personal data processing activities on the basis of work divisions,
- Ensures execution of necessary inspections in order to enable the application of legal provisions as per 12th article of law,
- Ensures conformity of data processing activities with the laws by means of inter-company policies and procedures,
- Gives authorizations in accordance with the quality of data being reached within the company,
- Makes accessing to personal data bearing private quality be subject to much tighter measures,
- Makes people having access to personal data bearing private quality be subject to additional safety controls,
- If there is access to personal data from outside the company due to reasons such as external source usages, our company receives commitments to ensure compliance of external service providers with the laws,
- They take necessary actions to notify all their employees and mainly those having authorization to have access to personal data, with regards to their duties and responsibilities within the scope of laws.

7) Rights of data owners

According to 11th article of law, data owners have below stated rights against data responsible person:

- Learning whether personal data relating with them have been processed or not and requesting relevant information if they have been processed.
- Learning the purpose of processing data and whether they are used in accordance with the purpose or not.
- Knowing about third parties to whom personal data have been transferred within domestic country or abroad.
- Requesting for correction if personal data have been processed wrongly or as deficient.
- Within the frame of conditions being foreseen in relevant legislation, requesting for personal data to be erased or destroyed and requesting for the processes being done to be notified to third parties to whom personal data have been transferred.
- Making objection to the outcome coming out against the person due to analysis of processed data exclusively through automatic systems_g

- Requesting for damages to be covered if they incur damages due to personal data's being processed as violating the laws.

In the 2nd item of 28th article of law, conditions where data owners do not have any claim rights have been listed and within this context, apart from the right to claim for coverage of damages occurring in relation to data due to following cases, the below specified rights shall not be used;

- Necessity of personal data processing to avoid conviction of crimes or for crime investigations,
- Processing of personal data that have been made public by relevant person,
- Requirement for the processing of personal data by public institutions and associations that are assigned and authorized as per the authorization provided by the laws and by the professional institutions bearing the quality of public institutions for the execution of inspection or regulation tasks and for execution of disciplinary investigations or prosecutions,
- Requirement of personal data processing for the protection of economic and financial interests of government in relation to budget, taxation and financial issues.

8) Usage of rights by data owners

You can make applications by using one of the below methods by conforming that the applicant is you:

- Transmission of a copy of application bearing wet signature to the address of Ekom Eczacibasi Dis Ticaret A.S. by hand, through notary public or via registered mail with return receipt,
- Delivery of application being signed with safe electronic signature as per the regulation within scope of Electronic Signature Law with no 5070, via registered electronic post to the address of ekomeczacibasi@ekomeczacibasi.hs02.kep.tr,
- Follow up of some other method being foreseen by Personal Data Protection Council.

Our company replies to data owners wishing to use mentioned rights within frame of limitations foreseen in the laws, within maximum 30 days again as being foreseen in the laws. In order for third parties to make application request on your behalf, it is required for you to give private warrant of attorney to such third parties as being issued by notary public.

While your applications are processed without any charges as a rule, if any charges are required for these applications by Personal Data Protection Council, pricing will be done as per this tariff.

Our company will be able to request information from relevant person in order to determine whether the applicant person is data owner or not and they will be able to direct questions relating with the application of data owner in order to clarify the particulars stated on the application.

9) Usage of CCTV (Closed circuit camera system)

If you visit the locations of our company, your visual and aural data could be obtained via closed circuit camera system and they could be kept only for below stated purposes for the required periods. With the usage of closed circuit camera system, it is aimed to avoid and monitor anti-social behaviors and acts that can constitute crimes, to ensure security of our company locations and the tools and equipment which are present at our company locations, and to protect the health and safety of visitors who visit our company locations and the employees. All kinds of technical and administrative measures required to ensure safety of your data being obtained by means of closed circuit camera system shall be taken by our company.

APPENDIX-1

CONCEPTS	DEFINITIONS
Open consent	It defines the declaration of consent based on notification about a specific subject and being taken with free will of data owners.
To make anonymous	It defines personal data's being transformed such that even if they are matched with other data, they can not be correlated with a real person whether his identity is specified or not or whether he is identifiable or not.
Relevant person/data owner	It defines real person whose personal data are processed.
Personal data	It defines all types of information relating with a real person whose identity is specified or whose identity can be determined
Personal data with private quality	It defines data being made subject to tighter protection regime within the scope of laws for the reason that if they are disclosed or lost, they can cause for data owner to suffer or be subject to discrimination.
Processing of personal data	It defines all types of processes being realized on the data such as obtaining the personal data by complete or partial automatic means or through ways that are not automatic as being part of a data registry system and their being recorded, stored, kept, changed, rearranged, disclosed, transferred, handed over, made available to be obtained, being classified or avoided to be used.
Data registry system	[t defines the registry system where personal data are structured and processed as per certain criteria.
Data responsible person	It defines the real or legal person who determines processing purposes and means of personal data and who is responsible from the establishment and management of data registry system.
Data processing person	It defines real or legal person who processes personal data as per the authorization given to him by data responsible person.