CCN YATIRIM HOLDİNG A.Ş.
PRIVACY NOTICE ON THE
PROCESSING OF PERSONAL DATA

1. What is personal data and who processes it?

Under Article 3 of the Personal Data Protection Law No. 6698, personal data means any information relating to an identified or identifiable natural person. CCN YATIRIM HOLDİNG A.Ş. (the "Company"), acting as the **"data controller"** under the Personal Data Protection Law No. 6698, will record, store, update and process your personal data in accordance with the law, and may disclose and transfer it to third parties.

2. For what purposes may your personal data be processed?

The categories of personal data we collect, as listed below, are processed on the following grounds:

Identity Data;

- Processing is expressly provided for by law (Article 5/2.a)
- Processing is necessary for the data controller to fulfil its legal obligations (Article 5/2.ç)
- Processing of personal data belonging to the parties to a contract is necessary, provided that it is directly related to the conclusion or performance of that contract (Article 5/2.c**)**

Contact Data;

- Processing of personal data belonging to the parties to a contract is necessary, provided that it is directly related to the conclusion or performance of that contract (Article 5/2.c)
- Processing is expressly provided for by law (Article 5/2.a)
- Processing is necessary for the data controller to fulfil its legal obligations (Article 5/2.ç)

Transaction Security Data

- Processing is expressly provided for by law (Article 5/2.a)
- Processing is necessary for the data controller to fulfil its legal obligations (Article 5/2.ç)
- Processing is necessary to ensure system security, prevent unauthorised access and monitor security incidents (Article 5/2.c)

Your contact details recorded through the website, the IP information of the communication devices you use to access the website, and data collected verbally, in writing or electronically, by automated or non-automated means through technical communication files used during your visit to our website, may be processed for the reasons and purposes set out below.

3. To whom and for what purposes may your personal data be transferred?

Your collected personal data may be transferred for the following purposes:

- Fulfilment of our Company's legal obligations;
- Ensuring the operation of our Company's corporate processes;
- Compliance with requests from official authorities;

- Undertaking activities to enable you to benefit from the products and services offered by our Company in the best possible way; ensuring the highest level of data security; and establishing databases;
- Taking the necessary steps to make, implement and carry out commercial decisions aimed at improving the services offered on our Company's website and resolving errors occurring on the website;

a) To our business partners;
b) To our suppliers;
c) To Company officers;
d) To legally authorised public institutions and private persons;

Such transfers may be made pursuant to Articles 8 and 9 of the Personal Data Protection Law.

4. On what legal grounds and by what methods do we collect your personal data?

Personal data is collected through technical communication files used during your visit to our website, by automated or non-automated means, verbally, in writing or electronically, through technical and other methods and various channels, including our Company's website. Such data is collected on legal grounds arising from legislation, contracts, requests and applications, in order to achieve the purposes set out in the Policy and to fulfil our statutory responsibilities fully and accurately.

5. Conditions for the Transfer of Personal Data

Our Company may transfer data subjects' personal data to third parties in accordance with the Law, for its personal data processing purposes, by establishing the necessary confidentiality arrangements and taking appropriate security measures. Our Company complies with the provisions of the Law when transferring personal data. In this context, our Company may transfer personal data to third parties for legitimate and lawful processing purposes, on the basis of and limited to the personal data processing conditions specified in Article 5 of the Law (for the purposes of resolving legal disputes and fulfilling obligations arising from legislation).

Conditions for the Transfer of Personal Data Abroad:

Our Company may transfer data subjects' personal data and special categories of personal data to third parties abroad for its personal data processing purposes, by taking the necessary security measures. In accordance with Article 9 of the Law, our Company may transfer personal data to foreign countries declared by the Personal Data Protection Board to provide adequate protection or, where adequate protection is not available, to foreign countries where the data controllers in Türkiye and in the relevant foreign country undertake in writing to provide adequate protection and the Board has authorised the transfer.

6. For how long is your personal data processed?

Personal data that you have shared with the Company through the channels specified in this Privacy Notice will be processed in accordance with the periods required by legislation on the protection of personal data, particularly the Personal Data Protection Law No. 6698 (KVKK), and other applicable legislation, and, in any event, for as long as the legitimate purposes set out above continue to apply.

7. What are your rights under the Personal Data Protection Law No. 6698?

Pursuant to Article 11 of the Personal Data Protection Law No. 6698, you have the right to:

- Learn whether your personal data is being processed;
- Request information regarding the processing of your personal data, if it has been processed;
- Learn the purpose of the processing of your personal data and whether it is used in accordance with that purpose;
- Know the third parties to whom your personal data is transferred domestically or abroad;
- Request the rectification of incomplete or inaccurate personal data and request that such rectification be notified to the third parties to whom the personal data has been transferred;
- Subject to statutory limitations, request the erasure or destruction of your personal data under the conditions set out in Article 7 of the Law, and request that such erasure or destruction be notified to the third parties to whom the personal data has been transferred;
- Object to a result arising to your detriment through the analysis of your processed data exclusively by automated systems;
- Request compensation for damage suffered as a result of the unlawful processing of your personal data.

8. How can you apply to the data controller?

You may submit requests to exercise the rights listed above to our Company in writing bearing your handwritten signature, or by using a registered electronic mail (KEP) address, a secure electronic signature, a mobile signature, or an email address previously provided by you to our Company and registered in our Company's systems.

Written applications must be submitted to "Üniversiteler Mah. 1604 Cad. No: 9/1 İç Kapı No: 114 Çankaya/Ankara". For a person other than the personal data subject to submit a request, that person must hold a special power of attorney issued by the data subject in their name in relation to the request.

Duly submitted requests received by our Company will be concluded free of charge within thirty days at the latest. If the response exceeds ten pages, a processing fee of TRY 1 may be charged for each page beyond the tenth page. If the response is provided on a recording medium such as a CD or USB flash drive, the cost of that medium may be charged.