

ZER MERKEZİ HİZMETLER VE TİCARET ANONİM ŞİRKETİ
PRIVACY NOTICE FOR PROCESSING OF PERSONAL DATA

Pursuant to the Personal Data Protection Law no. 6698 (the “**Law**”), your personal data may be processed by Zer Merkezi Hizmetler ve Ticaret Anonim Şirketi (“**Zer**” or the “**Company**”) in its capacity as data controller, within the scope described below.

Purpose and Legal Grounds of Processing of Personal Data

Your personal data that are collected may be processed for the following purposes (“**Purposes**”) and based on the following legal grounds, subject to the personal data processing terms and purposes defined in Article 5 of the Law.

Provided that it is directly related to the conclusion or performance of a contract, and on the basis of the legal ground regarding the requirement to process the personal data of the contracting parties:

- * For establishment of a business relationship between us and the company we are working with;
- * For performance of all kinds of obligations that may arise from such business relation, including the execution of a contract between us and the company of which you are an employee/officer and the offering of goods and services to you for your use.

Based on the legal grounds that it is expressly prescribed in the laws and that it is mandatory for the data controller to fulfill its legal obligation:

- * For fulfilment of requests from governmental authorities,
- * For disclosure of data to competent authorities pursuant to legislation,
- * For ensuring compliance with the retention obligations defined in the legislation,
- * Where the rights referred to in Article 11 of the Law are exercised; for giving a response to the applications by data subjects in accordance with the legislation and taking the necessary actions.

Provided that it does not cause prejudice to fundamental rights and freedoms of the data subject; based on the legal ground that data processing is mandatory for legitimate interests of the data controller:

- * For handling customer and user relations,
- * For establishment of a business relationship between us and the company you work for,
- * For monitoring and management of legal processes involving our company;
- * For performance by our business units of the necessary works and of the relevant business processes to offer the products and services supplied by us to the data subjects for their use, including the sales and marketing activities for our goods and services;
- * For performance by our business units of such necessary operational activities in order to offer our products and services to you,
- * For conducting and monitoring of accounting and financial operations
- * For performance of audit and ethics-related operations.

Based on the legal ground that data processing is mandatory for the establishment, exercise, or protection of a right:

- * For receipt, evaluation, and conclusion of your requests and complaints,
- * For storing personal data subject to general statute of limitations so that they may be used as evidence in any potential future dispute

Privacy Classification: RESTRICTED

Upon your explicit consent:

* For processing your identity, contact and user transaction data for carrying out the marketing processes of our goods and services, including Zer profile creation and analyses activities, and for offering and promoting our goods and services upon customization based on your likes, usage habits and needs,

* For processing your identity and contact details in order to send advertisements, promotions, and similar commercial electronic messages to your preferred contact details

To Whom and For What Purpose the Processed Personal Data may be Transferred:

Your personal data that are collected to fulfil the above-mentioned Purposes may be transferred in line with the rules applicable to the transfer of personal data as set out in Article 8 of the Law, based on the purposes for processing of personal data stipulated in Article 5 of the Law and such transfer may be made to our suppliers and business partners based on our legitimate interests, to legally competent public agencies and legally competent private persons, provided that it is expressly prescribed in the laws and is necessary in order to ensure that our legal obligations are fulfilled

Method for Collection of Personal Data

Your personal data are collected electronically through our website, and from the completed forms posted on our website, over our call centre, via SMS messages and e-mail channels, and in the case that you contact our Company in a physical medium, through conversations held and through mails, cargo and forms.

Rights of a Data Subject as per Article 11 of the Law

We hereby notify you that you are entitled to the following rights about your personal data pursuant to Article 11 of the Law:

- To inquire into whether or not your personal data are processed;
- If your personal data are processed, to ask for information about it;
- To inquire into the purpose of processing of your personal data, and whether or not they are used in line with such purpose;
- To learn about third parties to whom your personal data are transferred in Türkiye or abroad;
- If your personal data are processed incompletely or erroneously, to request their correction and to ask that third parties to whom your personal data have been transferred be notified of this correction;
- To request that your personal data be erased or destroyed if those reasons for processing of your personal data are no longer applicable, even if such data have been processed in line with the Law and other applicable legislative provisions, and in this respect, to ask that third parties to whom your personal data have been transferred be notified of such erasure or destruction
- To object to any result that is detrimental to you and that may arise as a result of analysis of your processed personal data solely by means of automatic systems;
- To request to be indemnified against your losses that may arise from unlawful processing of your personal data

You may send your requests about your rights listed above to our Company by completing the Data Subject Application Form available at https://www.promena.net/en/Uploads/Data_Owner_Application_Form.pdf and upon the receipt of your request, our Company shall finalize your request free of charge as soon as possible depending

on the nature of the request and within thirty days at the latest. However, if such process gives rise to an extra cost, the fee set out in the tariff determined by the Personal Data Protection Board may be collected by our Company.