

PROCESSING OF PERSONAL DATA LIGHTING TEXT

Within the scope of the PERSONAL DATA PROTECTION LAW No. 6698 ("KVKK") and related legislation, your personal data, verbal, written or electronic media, the purposes described below and the provision of our services within the determined legal framework and in this context, the law regarding our activities and the fulfillment of our legal obligations. and in accordance with its legislation, as a data controller; our company **MAVİMOR DANIŞMANLIK VE YÖNETİM HİZMETLERİ A.Ş.** and can be processed by authorized data processors.

Except for the exceptions stipulated by the relevant legislation; Your personal data will not be processed for any purpose other than the purpose of MAVİMOR DANIŞMANLIK VE YÖNETİM HİZMETLERİ **A.Ş.** is taken by

Collection Methods of Your Personal Data

Your personal data, verbally, in writing or electronically, in order to provide our services in line with the above-mentioned purposes and to fulfill our contractual and legal responsibilities completely and accurately, Turkish Commercial Code No. 6102, Tax Procedure Law No. 213, Consumer Protection No. 6502 The Law is collected due to the fulfillment of the obligations imposed on us by the provisions of the legislation, especially the Law on the Protection of Personal Data No. 6698.

WHICH PERSONAL DATA WE PROCESS

Your personal data that may be subject to processing by us is as follows.

Data Category	Personal Data Disclosure	Types of Personal Data Included in Relevant Personal Data
Credentials	Information contained in documents such as driver's license, identity card, residence, passport, attorney's ID, marriage certificate, which are clearly belonging to an identified or identifiable natural person and included in the data recording system.	TCKN, passport no., identity card serial no, name-surname, photo, place of birth, date of birth, age, place of registration, certified identity card sample, signature
Communication information	Information that clearly belongs to an identified or identifiable natural person and is included in the data recording system, and is used for the purpose of communicating with the person.	Email address, phone number, mobile number, address etc.
Location Data	Data that are clearly belonging to an identified or identifiable natural person and are included in the data recording system, which are used to determine the location of the data owner.	Email address, phone number, mobile number, location data, address, etc.
	Data that clearly belongs to an identified or identifiable natural person and is included in the data recording system, which serves to determine the location of the data owner,	Location data obtained during the use of company vehicles
Family Members and Close Information	Information about the family members and relatives of the personal data owner, which is clearly belonging to an identified or identifiable natural person, is included in the data recording system, and is processed in order to protect the legal interests of the relevant company and the data owner.	Identity information, contact information and professional, educational information etc. about the children and spouses of the personal data owner
Customer information	Information belonging to customers who benefit from our products and services, clearly belonging to an identified or identifiable natural person and included in the data recording system.	Customer number, profession information etc.
Customer Transaction Information	Information regarding all kinds of transactions carried out by customers who benefit from our products and services, which are clearly belonging to an identified or identifiable natural person and are included in the data recording system.	Requests and instructions, order and cart information etc.
Physical Space Security Information	Information of the physical space at the entrance to the physical space, which is clearly belonging to an identified or identifiable natural person and is included in the data recording system.	Entry and exit logs, visit information, camera recordings, etc.
Transaction Security Information	Personal data clearly belonging to an identified or identifiable natural person and included in the data recording system, processed in order to ensure the technical, administrative, legal and commercial security of our Company and related parties	Information showing that the person is authorized to match the transaction associated with the personal data owner and to perform that transaction (eg, website password and password information)
Risk Management Information	Personal data clearly belonging to an identified or identifiable natural person and included in the data recording system, processed in order to manage the commercial, technical and administrative risks of our Company	IP address, Mac ID etc. records
Financial Information	Personal data within the scope of information, documents and records that clearly belong to an identified or identifiable natural person and are included in the data recording system, showing all kinds of financial results created according to the type of legal relationship with the personal data owner. data	Information showing the financial result of the transactions made by the data owner, credit card debt, loan amount, loan payments, interest amount and rate payable, debt balance, receivable balance, etc.
Personal Information	Personal data that is clearly belonging to an identified or identifiable natural person and is included in the data recording system, which forms the basis of the personal rights of the employees.	All kinds of information and documents that are legally required to be entered in the personnel file (eg Salary amount, SSI premiums, payrolls, etc.)

Data Category	Personal Data Disclosure	Types of Personal Data Included in Relevant Personal Data
Worker Candidate Information	Personal data used in the application evaluation process, belonging to data owners who share their information in order to apply for a job with our Company, which are clearly belonging to an identified or identifiable natural person and are included in the data recording system.	Curriculum vitae, interview notes, personality test results, etc.
Worker Transaction Information	Personal data related to all kinds of transactions carried out by employees or work, which are clearly belonging to an identified or identifiable natural person and are included in the data recording system.	Job entry-exit records, business trips, information about meetings attended, security inquiries, e-mail traffics tracking information, vehicle usage information, company credit card spending information, etc.
Employee Performance and Career Development Information	Personal data clearly belonging to an identified or identifiable natural person and included in the data recording system, processed for the purpose of measuring the performance of employees and planning and carrying out their career development within the scope of human resources policies	Performance evaluation reports, interview results, career development training etc.
Benefits and Benefits Information	Planning the fringe benefits and benefits offered to the employees, which are clearly belonging to an identified or identifiable natural person and included in the data recording system and personal data processed for the benefit of employees	Vehicle allocation etc.
Marketing Information	Data that are clearly belonging to an identified or identifiable natural person and included in the data recording system, to be used by our Company in marketing activities	Reports and evaluations showing the habits and tastes of the person collected for marketing purposes, targeting information, cookie records, data enrichment activities, etc.
Legal Transaction and Compliance Information	Personal data clearly belonging to an identified or identifiable natural person and included in the data recording system, processed for the purpose of determining and monitoring legal receivables and rights, and fulfilling debts and legal obligations	Data contained in documents such as court and administrative authority decisions
Audit and Inspection Information	Legal obligations and company policies of our Company, which are clearly belonging to an identified or identifiable natural person and included in the data recording system. Personal data processed within the scope of compliance	Audit and inspection reports, related interview records and similar records
Special Qualified Personal Data	Race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, dress and dress, membership of an association, foundation or trade union, which are clearly belonging to an identified or identifiable natural person and included in the data recording system, blood type, health, sexual life, criminal conviction and security measures data and biometric and genetic data	Race, ethnicity, political thought, philosophical belief, religion, sect or other belief, dress and dress, association, foundation or union membership information, data on health and sexual life, data on criminal convictions and security measures, biometric data, genetic data
Request / Complaint Management information	Any request or complaint addressed to our Company, which clearly belongs to an identified or identifiable natural person and is included in the data recording system. personal data regarding the collection and evaluation of	All kinds of requests and complaints against companies, related records and reports
Reputation Management Information	It is clear that it belongs to an identified or identifiable natural person and that is included in the data recording system, that may affect the reputation of our Company's shareholders, employees, business partners or customers. personal data	Personal data etc. in negative news about the company on social media
Visual and Audio Data	Personal data that clearly belongs to an identified or identifiable natural person and is included in the data recording system. visual and audio recordings associated with the data subject	Photos, camera recordings and audio recordings

PURPOSE OF PROCESSING PERSONAL DATA

Personal data listed above and personal data of special nature;

- Execution of emergency management processes,
- Execution of information security processes,
- Execution of employee candidate/intern selection and placement processes,
- Carrying out the application processes of employee candidates,
- Execution of employee satisfaction and loyalty processes,
- Fulfilling the obligations arising from the employment contract and legislation for the employees,
- Execution of fringe benefits and benefits processes for employees,
- Conducting audit/ethics activities,
- Conducting educational activities,
- Execution of access authorizations,
- Execution of activities in accordance with the legislation,
- Execution of finance and accounting works,
- Execution of service commitment processes,
- Ensuring physical space security,
- Execution of assignment processes,
- Follow-up and execution of legal affairs,
- Carrying out internal audit/investigation/intelligence activities,
- Conducting communication activities,
- Planning of human resources processes,
- Execution/supervision of business activities,
- Carrying out occupational health / safety activities,
- Receiving and evaluating suggestions for improvement of business processes,
- Maintaining business continuity activities,
- Execution of goods/service purchasing processes,
- Execution of after-sales support services,
- Execution of service sales processes,
- Execution of service production and operation processes,

- Execution of professional management processes,
- Execution of risk management processes,
- Carrying out storage and archiving activities,
- Execution of contract processes,
- Carrying out strategic planning activities,
- Follow-up of requests/complaints,
- Ensuring the security of movable property and resources,
- Execution of wage policy,
- Execution of marketing processes of services,
- Ensuring the security of data controller operations,
- Execution of investment processes,
- Carrying out talent/career development activities,
- Providing information to authorized persons, institutions and organizations,
- Execution of management activities,
- It can be processed for the purposes of creating and tracking visitor records and can be transferred to third parties when necessary in accordance with the legislation.

Transfer of Your Personal Data

As a rule, your personal data is not transferred to third parties without the explicit consent of the persons concerned, within the scope of the rules specified in the KVKK and the purposes specified in this Clarification Text.

In addition, in order to ensure that the services offered are complete and flawless by taking the necessary security measures in line with the purposes of personal data processing, and only to the extent appropriate with the nature of the service, our business and solution partners, our performance assistants, the organizations providing payment services and the purpose of our service and activity. or, in cases stipulated by the relevant legislation, to regulatory and supervisory institutions, official authorities and third parties who perform other similar transactions on our behalf. These third parties consist of persons who are obliged to have access to the relevant information in order to provide the relevant services completely and flawlessly.

Apart from these, the data has to be shared with other third parties in order to provide the service completely and flawlessly , **MAVİMOR DANIŞMANLIK VE YÖNETİM HİZMETLERİ A.Ş.** Your personal data may also be transferred, limited only to the person or institution concerned, in cases where it is mandatory for the Company to fulfill its legal obligations, it is expressly stipulated in the laws, or there is a judicial/administrative order given in accordance with the law.

Your personal information is not shared with third parties for marketing purposes, but instead, **MAVİMOR DANIŞMANLIK VE YÖNETİM HİZMETLERİ A.Ş.** On behalf of the business partners, **MAVİMOR DANIŞMANLIK VE YÖNETİM HİZMETLERİ A.Ş.** You are given the option to decide whether you want to receive messages from (without passing your personal information to third parties).

MAVİMOR DANIŞMANLIK VE YÖNETİM HİZMETLERİ A.Ş. provides some limited services such as the processing and delivery of mail, providing customer support services, hosting websites, executing commercial transactions or performing statistical analysis of our services. It can establish contractual relations with third parties in accordance with the current legislation in order to perform on its behalf. These service providers must receive only the information that will be necessary to provide the service, the condition of protecting the confidentiality of the relevant information and the said information should not be used outside of its purpose.

Some of the personal data may be shared with advertisers in an aggregated anonymized form, only together with the information of other users, in order to ensure that the advertisements can be adapted to the target audience. Anonymized data is information that cannot be matched with data subjects and does not contain any identifying information or make it identifiable. Confidentiality is guaranteed in anonymized data.

Circumstances in which Personal Data can be Processed without Explicit Consent pursuant to KVKK:

Pursuant to Article 5 of the KVKK and Article 7 of the Regulation, the following Personal Data may be processed without your explicit consent in the following cases:

In cases expressly provided for by law.

- If you, as the data owner, are unable to express your consent due to actual impossibility, or in cases where your consent is not legally valid, it is necessary to process your personal data in order to protect your own or someone else's life or physical integrity,
- Provided that it is directly related to the establishment or performance of a contract, it is necessary to process your Personal Data belonging to the parties to the contract,
- It is compulsory for the fulfillment of a legal obligation,
- Your Personal Data has been made public by you,
- Data processing is mandatory for the establishment, exercise or protection of a right,
- Data processing is mandatory for legitimate interests, provided that it does not harm your fundamental rights and freedoms.
- Personal health data; It may be processed without the explicit consent of the person concerned, by persons or authorized institutions and organizations under the obligation of secrecy, for the purpose of protecting public health, performing preventive medicine, medical diagnosis, treatment and care services, planning and managing health services and their financing.

Rights of Personal Data Owners Listed in Article 11 of Law No. 6698

Article 20 of the Constitution states that everyone has the right to be informed about their personal data. Accordingly, in Article 11 of the KVKK, "requesting information" is also listed among the rights of the personal data owner.

MAVİMOR CONSULTING AND YÖNETİM HİZMETLERİ A.Ş. In this context, Articles 20 and 6698 of the Constitution

In accordance with Article 11 of the Law No. 11, it provides the necessary information in case the personal data owner requests information. Personal data owners within the scope of Article 11 of Law No. 6698;

- Learning whether personal data is processed or not,
- If personal data has been processed, requesting information about it,
- Learning the purpose of processing personal data and whether they are used in accordance with its purpose,

- Knowing the third parties to whom personal data is transferred at home or abroad,
- Requesting correction of personal data in case of incomplete or incorrect processing and requesting notification of the transaction made within this scope to the third parties to whom the personal data has been transferred,
- Requesting the deletion or destruction of personal data in the event that the reasons requiring its processing have disappeared, although it has been processed in accordance with the provisions of the Law No. 6698 and other relevant laws, and to request the notification of the transaction made within this scope to the third parties to whom the personal data has been transferred,
- Objecting to the emergence of a result against the person himself by analyzing the processed data exclusively through automated systems,
- In the event that personal data is damaged due to unlawful processing, it has the right to demand the compensation of the damage.

However, you can always notify changes and/or updates regarding your personal data via e-mail to kisiselveri@mavimor.com.tr or by personally applying to **Tantavi Mahallesi Estergon Caddesi Exen İstanbul Sitesi F Blok No 24 F/51 Ümraniye İstanbul .**

How Long Will Your Personal Data Be Processed?

In accordance with KVKK, your personal data processed for the purposes specified in this Clarification and Consent Text, KVKK article. Your personal data will be deleted, destroyed or anonymized by us when the purpose of processing according to 7/f.1 ceases and/or when the statute of limitations for us to process your data expires in accordance with the legislation.

Changes and Updates

This clarification text has been prepared within the scope of the Law on the Protection of Personal Data No. 6698 and other relevant legislation. Related legal regulations and/or **MAVİMOR DANIŞMANLIK VE YÖNETİM HİZMETLERİ A.Ş.** Necessary changes can be made in the aforementioned clarification text in line with the changes that will occur in the personal data processing purposes and policies of .

Changes to be made in the lighting text and the updated text will become effective immediately as of the date they are notified to you.