

## ZORLU HOLDİNG ANONİM ŞİRKETİ

### Disclosure on the Processing of Personal Data

As Zorlu Holding A.Ş. (“the Company”), we take the utmost care in terms of the protection and safety of your personal data. In this context, as Data Controller, we would like to enlighten and inform you in the most transparent way on the methods with which your personal data is collected, the purposes of processing, the legal bases for the processing, and your rights pursuant to the Law No. 6698 on the Protection of Personal Data (“the Law”).

#### PURPOSE OF PROCESSING PERSONAL DATA AND LEGAL BASIS

Your personal data is processed in line with the purposes stated below, as per the legal bases specified in Articles 5 and 6 of the Law.

PROCESSED PERSONAL DATA	PURPOSE	LEGAL BASIS
<b>Identity information</b> <b>Contact Information</b> <b>Information on Process Security</b>	<ul style="list-style-type: none"><li>– Providing Information to Authorized Persons, Institutions and Organizations</li><li>– Fulfillment of our regulatory obligations.</li><li>– Execution of Information Security Processes</li><li>– Execution of Activities in Compliance with the Legislation</li><li>– Follow-Up and Execution of Legal Affairs</li></ul>	<p>The condition of being expressly provided by the laws as stipulated in Article 5 of the Law</p> <p>Legal obligation stipulated in Article 5 of the Law (e.g. As per the Law, data controllers must ensure data security),</p> <p>- data processing is mandatory for the establishment, exercise or protection of a right (e.g. In case it is the subject of any legal dispute, it has the quality of evidence),</p> <p>- personal data may be processed provided that the fundamental rights and freedoms of the relevant persons are not harmed in the presence of the legitimate interest of the data controller. Accordingly, the processing of personal data under our Company's commercial activities is considered to be covered by this provision.</p>

#### PERSONAL DATA COLLECTION METHOD

Your personal data may vary depending on the service, product or commercial activity provided by our Company, and may be collected from you verbally, in writing or electronically, through automatic or non-automatic methods, the call center, or the website.

#### PERSONAL DATA STORAGE PERIOD

Our Company will store personal data for as long as required by the above-mentioned processing purposes. Additionally, should a dispute arise, our Company will store your personal data limited to

the purpose of putting up the necessary defense within the scope of the dispute and during the statute of limitations determined in accordance with the relevant legislation.

#### **PARTIES TO WHICH PERSONAL DATA IS TRANSFERRED AND PURPOSE OF TRANSFER**

Within the scope of the purposes specified in the first Article of this Disclosure on the Processing of Personal Data, and pursuant to Articles 8 and 9 of the Law, your personal data may be shared with our suppliers from which we receive services concerning software, maintenance, security and the storage of personal data under information technologies and our business partners from which we seek legal assistance when needed for legal reasons since your identity, contact and transaction security information is essential for authorized public institutions and organizations, as well as the data controller to fulfill their legal obligations in case of a legal conflict.

#### **MEASURES AND COMMITMENTS REGARDING DATA SECURITY**

Our Company undertakes

- to ensure personal data is not processed unlawfully,
- to ensure personal data is not accessed unlawfully,
- to take the necessary technical and administrative measures and have the necessary audits conducted to warrant the appropriate level of security to ensure the storage of personal data.

Our Company shall not disclose the personal data obtained about you to others in violation of the Disclosure on the Processing of Personal Data and the provisions of the Law on the Protection of Personal Data and the relevant legislation, and shall not use it for purposes other than processing.

In case of linking to other applications through our web site, our Company shall not assume any responsibility for the privacy policies and content of the said applications.

#### **YOUR RIGHTS REGARDING THE PROTECTION OF PERSONAL DATA**

Pursuant to Article 11 of the Law, regarding your personal data you have the right

- to learn whether your personal data is processed or not,
- to request relevant information if your data is processed,
- to learn the purpose of the processing of your personal data and whether it is used for intended purposes,
- to learn about the third parties inside or outside the country to which your personal data is transferred,
- to request the rectification of the incomplete or inaccurate data, if any, and to request the notification of such transaction to third parties to whom your personal data has been transferred,
- to request the deletion or destruction of personal data although it has been processed in accordance the Law and the provisions of other laws in the event that the reasons requiring their processing cease to exist, and to request the notification of such transaction to third parties to whom your personal data has been transferred,
- to object to any unfavorable outcomes against you as the data subject since the processed data was exclusively analyzed by automated systems,
- to request compensation for your damages in case you incur damages due to the processing of your personal data in violation of the law.

As the Data Owner, you may submit your requests regarding these rights to Levazım Mah. Koru Sok. No:2 PSM/70 34340 Beşiktaş/İstanbul in writing, as registered electronic mail (REM), secure electronic signature or mobile signature to [zorluholding@hs03.kep.tr](mailto:zorluholding@hs03.kep.tr) , or via the e-mail address you have previously notified our Company of and which is registered in the systems of our Company, to [kvk@zorlu.com](mailto:kvk@zorlu.com) . Your request will be evaluated and assessed within 30 (thirty days). In the requests submitted by you as the Data Owner, it is obligatory to include your name, surname, signature if the application is made in writing, your Republic of Turkey identity number, or if you are a foreigner, your nationality, your passport number or identity number, if any, your place of residence or work address for notification, your e-mail address, if any, for notification, your telephone and fax numbers and the subject of the request. In case of a written response to the request, no fee will be charged for up to ten pages, and our Company reserves the right to charge a fee for responses over ten (10) pages, based on the fee schedule stipulated by the legislation. If the response to the application is given in a recording medium such as CD or USB stick, our Company may charge you a fee equal to the cost of the recording medium.

#### **CHANGES TO THE TEXT**

Our Company may change the provisions in this text at any time by publishing it. The provisions amended by our Company become effective on the date of publication.

**Last updated on: September 30, 2024**