

1- INTRODUCTION

The basic information on the Protection of Personal Data and the permits granted for **PRIVACY and PERSONAL DATA PROTECTION to POLİYA POLİESTER SANAYİ VE TİCARET LİMİTED ŞİRKETİNE (POLİYA)** are given below.

If the section referring to these RULES is approved, it will **be deemed ACCEPTED** by the Data owner and to have knowledge of all of these rules, to read them and to authorize the **POLİYA** with respect to this content.

In order to fulfil the obligation of disclosure arising from the Article 10 of the Law on the Protection of Personal Data No. 6698, POLİYA presents the following explanations to the information and attention of the 3rd parties who use our website.

POLİYA has the right to update these Personal Data Protection regulations at any time, in part or in whole, within the framework of any changes to the applicable legislation, and any changes to the legislation will be considered binding on both **POLİYA** and our followers.

2- PURPOSE AND SCOPE

Law No. 6698 on Protection of Personal Data was published in the Official Gazette dated April 7, 2016 and numbered 29677. The PDP Law is designed to protect the fundamental rights and freedoms of natural persons, including the privacy of persons whose Personal Data is processed and protected by the Constitution, and to determine the obligations of natural and legal persons who process Personal Data. In addition, the Law No. 6563 on the Regulation of Electronic Commerce contains provisions on the Protection of Personal Data. The provisions of the Turkish Penal Code No. 5237 also stipulate criminal sanctions for the Protection of Personal Data in some cases.

3- DEFINITIONS AND ABBREVIATIONS

In this section, special terms and phrases in politics, concepts, abbreviations, etc. are briefly explained.

3.1. POLİYA: POLİYA POLİESTER SANAYİ VE TİCARET LİMİTED ŞİRKETİ

Explicit Consent: The Consent which is limited to data processing for an issue, based on the information and free will.

3.3. Anonymization: Making Personal Data unable to be associated with a specific or identifiable real person under any circumstances, even by matching it with other data.

3.4. Employee: Employee of POLİYA POLİESTER SANAYİ VE TİCARET LİMİTED ŞİRKETİ.

3.5. Service Provider: Personnel of the company (supplier, subcontractor, etc.) from which **POLİYA** receives and / or provides services.

3.6. Personal Data owner (Relevant Person): the actual person whose Personal Data is processed.

3.7. Personal Data: any information relating to a specific or identifiable real person.

3.9. Special Qualified Personal Data: information that, if learned, may cause the relevant person to be victimized or discriminated against.

3.10. Processing of Personal Data: Obtaining Personal Data in whole or in part by automatic or non-automatic means provided that it is part of any data recording system, saving, storing, changing, rearranging, explaining, transferring, data retrieval, all kinds of operations performed on the data, such as making the data available, classifying it or preventing it from being used.

3.11. Data Processor: A natural or legal person who processes Personal Data on behalf of the Data Controller based on the authorization given by the Data Controller.

3.12. Data Controller: A real or legal person who determines the purposes and means of processing Personal Data, is responsible for the establishment and management of the data recording system and is obliged to register with the Data Controller Register.

3.13. PDP Board: Personal Data Protection Board

3.14. PDP Institution: Personal Data Protection Authority

3.15. PDP Law: Personal Data Protection Law which was published in Official Gazette with the date 07 April 2016 and number No. 29677

3.16. Policy: POLIYA, a Policy for the Protection and processing of Personal Data.

4. WAYS OF COLLECTING PERSONAL DATA :

The data provided by the people who make transactions on the <https://www.poliya.com> website or on the mobile website are processed by **POLIYA** in accordance with their consent and the provisions of the legislation.

<https://www.poliya.com> may match information collected from you on the site at different times or through different methods, such as information collected online and offline, and may use this information in conjunction with information from other sources, such as third parties.

5. RESPONSIBILITIES

5.1 Data Controller

Pursuant to the PDP Law, it means obtaining Personal Data in whole or in part by automatic or non-automatic means provided that it is part of any data recording system, saving, storing, changing, rearranging, explaining, transferring, data retrieval, all kinds of operations performed on the data, such as making the data available, classifying it or preventing it from being used.

5.2 Representative Controller for Data Protection

When the Data Controller Register is established, **POLIYA** will appoint a data representative required for registration in the Data Controller Register, which will appoint an Expert Representative to be responsible for the protection and processing of all Personal Data, taking security measures and conducting regular audits.

5.3 Data Processor

Natural or legal persons who process Personal Data on behalf of **POLIYA**, in accordance with the authority granted by **POLIYA**, of the data archived within the consent/permissions given by the relevant legal regulations and data owners.

5.4 Responsibility

In case of processing of Personal Data by another natural or legal person on behalf of **POLIYA**, with authority granted by **POLIYA**, the data processing with **POLIYA** as the Data Controller 3rd Persons shall be jointly responsible for the necessary protection and the taking of the regulations/measures ordered by other legislation. **POLIYA**, as a data Controller under its responsibilities under the legal regulations, periodically checks the compliance of data processors with the Privacy Policy in order to ensure that the trust they provide to those who share their Personal Data is maintained in the same way by their business partners, service providers, suppliers, and contractors.

6. LEGAL OBLIGATIONS

According to PDP law, **POLIYA** has legal obligations under the protection and processing of Personal Data. The obligations are listed as follows:

6.1 Obligation to Enlighten

During the collection of Personal Data, **POLIYA** is obliged to inform the relevant person and inform the relevant person about the following matters within the framework of the relevant legislation:

- The identity of the data Controller and the representative, if any,
- The purpose for which the Personal Data will be processed,
- To whom and for what purpose the Personal Data processed can be transferred,
- The legal reason for collecting Personal Data,
- Rights of the relevant person.

Within the scope of POLIYA's enlightening obligation; inform people about the different means of processing their Personal Data. In addition, POLIYA emphasizes that public policies can be understood by the owners of Personal Data.

The internal policies have been determined by which tools will be used to inform the relevant persons.

6.2 Obligation to inform

The rights to the Protection of Personal Data of the person to whom the Personal Data is provided are as set out in Article 11 of the PDP law (Section 12 of this document). In accordance with PDP law, POLIYA is obliged to evaluate the requests for such rights and inform the relevant persons within the scope of the action to be taken in accordance with their demands and this notification shall be carried out within the period ordered by the legislation.

Such requests must be communicated to POLIYA in writing by the relevant persons or by other means to be determined by the PDP Board. POLIYA is working to provide more opportunities to apply to the relevant person and to exercise his rights so as not to contradict the board's decision on this matter.

6.3 Obligation to ensure data security

In the capacity of POLIYA data Controller, the obligations related to data security arising from Article 12 of PDP law are stated by other regulations, especially Section 11 of this document, and without limitation, the relevant legislation and the mandatory matters brought by the Board shall also be applied by POLIYA separately.

6.4 Obligation to register at the Data Controllers Register

In accordance with Article 16 of the PDP Law, POLIYA is obliged to register with the Data Controller Register within the period determined and announced by the PDP Board in accordance with the Regulation and other legislation.

7. CLASSIFICATION OF PERSONAL DATA

7.1 Personal Data:

PDP law defines the Personal Data as any information relating to a specific or identifiable real person. In this context, the person's data must be specific or identifiable (when combined with other information, the person must be reached). A person's name, surname, date, and place of birth, identity, social security number, phone number, address, images, payment information, health information, and other such information are under the definition of Personal Data.

The subject of Personal Data Protection is processed by natural persons and legal persons are excluded from the scope. Therefore, information that does not contain real person's information, such as a legal person's registration number, trade name, and registration information is not protected as Personal Data in accordance with the law.

7.2 Special Qualified Personal Data:

Special Qualified Personal Data is the information that, if learned, can lead to victimization or discrimination and in PDP it is defined as *"Data about the race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, disguise and dress, association, foundation or union membership, health, sexual life, criminal conviction, and security measures and biometric and genetic data are the Special Qualified Personal Data"*.

The processing of Special Qualified Personal Data without the explicit consent of the relevant person is prohibited except in cases expressly authorized by the law.

In this regard, such Personal Data shall not be processed by POLIYA except in cases where it is required to be processed in accordance with the Law or processed in accordance with the conditions specified in Article 6 of the PDP Law, with the Explicit consent of the relevant person.

8. RULES FOR PROCESSING PERSONAL DATA

8.1 Principles regarding the processing of Personal Data:

All Personal Data collected will be processed in accordance with the principles specified in Article 4 of the Law on the PDP and the conditions specified in Articles 5 and 6. In accordance with Article 4 of

the PDP Law; **POLİYA** is responsible for the processing of Personal Data in accordance with the law and honesty, accurate and, if necessary, up to date, specific, clear and legitimate purposes for the processing of Personal Data, in connection with the purpose, in a limited and measured manner.

In this framework :

- **POLİYA** is obliged to act in accordance with the rules, prohibitions, rights, and principles stipulated by laws and other legal regulations during the processing of Personal Data.
- **POLİYA** shall be transparent during the processing of Personal Data and comply with the information and disclosure obligation in order to comply with the rules of honesty.
- **POLİYA** will be able to process Personal Data for legitimate and lawful reasons, ie only for legally explicitly defined and lawful purposes, within the scope of the authorization granted to it when it is required to obtain a permit.
- **POLİYA** will process Personal Data to the extent necessary. In this context, considering the principle of proportionality, Personal Data will not be used except for the activities carried out by **POLİYA** and the situations required by the purpose of these activities. Furthermore, the processing of Personal Data that is not needed or not required will be avoided by exceeding the measure to achieve the goal.
- **POLİYA** shall retain Personal Data for as long as is necessary for the purpose for which they are processed or provided for in the relevant legislation and shall not, after the expiration of this period, store such data without anonymizing it (where possible) for any reason.

8.2 POLİYA's Personal Data processing purposes:

8.2.1. POLİYA is processing the Personal Data in accordance with the provisions of Articles 5 and 6 of the PDP Law with the consent of the relevant person in the legal legislation in cases where approval is required for the following purposes and similar purposes:

- Personal and contact data: Name-Surname, telephone, e-mail information are used for communication purposes. The data collected in this direction is used to provide better service by enhancing it with the execution and development of operational activities such as business development, marketing and communication.

8.2.2. Except for the data-based purposes stated above, data is generally collected within the following considerations.

- Sending messages, newsletters and other publications via e-mail and similar platforms
- To answer questions and provide an effective service,
- Giving information about new services,
- To record the address and other necessary information for communication,
- To issue all records and documents that will be the basis of the transaction in electronic (internet / mobile etc.) or paper environment,
- To be able to provide information to public officials upon request and in accordance with the legislation on public safety issues,
- To be able to offer suggestions by our contracted institutions and solution partners and to inform them about our services,
- To be able to evaluate the complaints and suggestions about our services,
- To fulfil our legal obligations and to exercise the rights arising from the legislation in force,

8.3 Ensuring that Personal Data is processed in accordance with the law:

POLİYA is obliged to take the following technical measures for the processing of Personal Data in accordance with the law.

- To organize in-house for the processing and storage of Personal Data in accordance with the law,
- To establish the technical infrastructure to ensure the security of the databases where Personal Data will be stored,
- To ensure the supervision of the technical infrastructure and processes created,
- To determine procedures for reporting of technical measures and audit processes taken,
- **POLİYA** shall take the following administrative measures for the legal processing of Personal Data:
 - To inform and educate company employees about the legal protection and processing of Personal Data,
 - To record the measures to be taken in cases of unlawful processing of Personal Data by the employees of the company in the contracts, documents or policies made with the employees of the company,
 - It is responsible for supervising the processing of Personal Data of the data processors and partners it works with.

9. PERSONAL DATA TRANSFER POLICY

The sharing of Personal Data with third parties takes place with the consent of the data person/owner, and as a rule Personal Data is not transmitted to third parties without the consent of the data person/owner.

However, due to and limited to our legal obligations, Personal Data may be shared with the courts and other public institutions in a manner that is not in violation of the legislation on PDP.

Personal Data can be shared with **POLİYA** shareholders with a direct/indirect, domestic/international, our affiliates, our collaborative partner for our program to carry out activities of institutions, organizations, cloud data storage service we receive as domestic/international individuals and institutions, the sending of commercial electronic messages regarding our contracted domestic/overseas institutions we have agreements with banks, and in order to deliver better service abroad and various agencies within the scope of various marketing activities, advertising companies, survey companies and domestic/overseas with other third parties, our business partners and relevant partners.

9.1 Domestic data transfer:

POLİYA is obliged to act in accordance with the decisions and regulations taken by the PDP board as prescribed in the PDP law regarding the transfer of Personal Data. Personal Data and Special Qualified Personal Data of related parties may not be transferred by **POLİYA** to other natural persons or legal entities without the explicit consent of the relevant person. In so far as, where required by the PDP Law and other Laws, the data may be transferred to the authorized administrative or judicial institution or organization without the explicit consent of the relevant person as bound by the legislation. It may also be transmitted without the consent of the relevant person in the cases provided for in Article 2, paragraph 2 of Article 5, or in paragraph 6 of Article 6 for Special Qualified Personal Data, as provided for in Article 8 of the PDP Law (e.g. compulsory for the establishment or performance of a contract or the fulfilment of a legal obligation). **POLİYA** may transfer to third parties in Turkey where it cooperates/receives services in order to prevent the use of them by the 3rd party after the termination of the business relationship with the 3rd party including limited Personal Data in accordance with the conditions stipulated in the Law and taking all necessary security measures for the purpose of commercial purposes and activities.

9.2 Transfer of Personal Data to abroad:

POLİYA shall not transfer confidential information abroad except in cases where the relevant person has received the relevant person's consent. However, **POLİYA** may transfer Personal Data abroad for processing in Turkey or for processing and storing outside Turkey. In exceptional cases where explicit consent is not sought for the transfer of Personal Data as set out in the PDP law, in addition to the non-consensual processing and transfer requirements, adequate protection is required in the country where the data will be transferred. The PDP Board shall determine whether adequate protection is provided and if there is not enough protection, the data responders in both Turkey and the relevant foreign country must undertake adequate protection in writing and have the consent of the PDP Board.

9.3 The measures taken by the POLİYA regarding the legal transfer of Personal Data:

• Measures that have been taken in a technical way:

POLİYA shall take measures to prevent unauthorized access and use of Personal Data processed and transmitted or received as a result of transmission by different affiliates within the body of the Bank, by different units within the affiliates and by the real or legal persons who process Personal Data on behalf of **POLİYA**.

• Measures that have been taken in an administrative way:

POLİYA establishes internal policies regarding who should be given access to Personal Data and for what purpose by different affiliates, different units within the said affiliates and by real or legal persons who process Personal Data on behalf of **POLİYA**.

10. STORAGE OF PERSONAL DATA POLICY

10.1 Retaining for the period required by the relevant legislation or for the purpose for which they were processed:

In accordance with Article 7 of the PDP Law and Article 138 of the Turkish Penal Code, **POLİYA** shall only retain the Personal Data it has processed for as long as required by the purpose of Personal Data processing unless the relevant legislation provides for a period. The retained data will be erased after the purpose of the retention of the data, and the maximum period of deletion is averaged 2 years after the end of the purpose of the retention of the data and in the case of statutory and mandatory

longer or shorter periods of time, the data will remain in the system for the period specified in the legislation.

For this reason, a different retention period may apply to each Personal Data, as provided for in the relevant legislation or as required for the purpose for which they are processed.

For example, in accordance with Article 253 of the Tax Procedure Law, books and documents must be kept for 5 (five) years.

On the other hand, a data may also be processed for more than one purpose, and in such a case, if there is no regulation in the legislative office ordering otherwise, the relevant data will be deleted, destroyed or stored anonymously if all the reasons for the processing of the relevant data are eliminated.

10.2 The measures taken by the POLIYA regarding the storage of Personal Data:

Personal Data, processed in accordance with the provisions of the PDP Law and other relevant law, in case the reasons requiring processing are eliminated, shall be deleted, destroyed or anonymized by POLIYA on its own initiative or at the request of the relevant person. The procedures and principles regarding the destruction or anonymization of Personal Data shall **be carried out in accordance with the principles and rules** specified in the PDP Regulation.

• Measures that have been taken in a technical way:

Necessary systems and control mechanisms for deleting, destroying and anonymizing Personal Data are **established** by POLIYA.

• Measures that have been taken in an administrative way:

POLIYA, based on the authority given to POLIYA on its behalf real or legal persons who process Personal Data on the Protection of Personal Data in accordance with the law to inform and raise awareness, also take measures to protect and delete, destroy or anonymize their Personal Data under contracts concluded with it.

POLIYA is responsible for overseeing the Personal Data Protection activities carried out by its natural or legal persons who process Personal Data on its behalf, based on its authority.

11. SECURITY POLICY OF PERSONAL DATA

11.1 POLIYA's Data Security Obligations

Pursuant to Article 12 of the PDP Law, POLIYA's obligations regarding data security as data Controller are as follows;

• POLIYA shall provide those for Personal Data;

- To prevent unlawful processing,
- To provide unlawful access
- To provide the storage,
- To take all kinds of technical and administrative measures,
- To make or have the necessary audits done within the organization,
- To take necessary measures to ensure that the Personal Data that is processed on behalf of the person or the officials working in their organs even after they leave their duties, and that they do not disclose the Personal Data they learned during their duties in contradiction with the provisions of the law and use it for purposes other than processing,
- Informing the related person and the Board if the processed Personal Data is unlawfully seized by others,

11.2 Measures taken by POLIYA regarding data security:

In order to fulfil its obligations regarding the security of Personal Data and to act quickly when security poses a risk, POLIYA shall take the following measures:

11.2.1. Technical and administrative measures taken to prevent unlawful access to Personal Data:

The technical and administrative measures to be taken in the relevant sections regarding the processing, transfer and storage of Personal Data are listed. Although POLIYA is obliged to take these measures completely and to prevent unlawful access; nonetheless, unlawful access by third parties to Personal Data; takes all technical and administrative measures in order to protect the Personal Data in accordance with the relevant legislation and Board decisions.

11.2.2. Measures taken for the Protection of Personal Data and their auditing:

The data recording systems used within POLIYA are established and used in accordance with the PDP Law and the relevant legislation and are periodically monitored and audited and reported to the authorized person or board to the extent required by the legislation.

POLIYA is obliged to inform and raise awareness about the legal Protection of Personal Data of natural or legal persons who process Personal Data on its behalf by the authority given; at the same time to set provisions for the legal Protection of Personal Data within the framework of the contracts concluded with these persons.

11.2.3. Measures to be taken in case of unauthorized disclosure of Personal Data:

POLIYA is obliged to take measures to prevent unauthorized disclosure of Personal Data and to establish a domestic policy on it. In addition, in such cases, **POLIYA**, as a chief data Controller, is responsible for informing individuals whose Personal Data has been disclosed in an unauthorized manner and the PDP Board.

12. RIGHTS OF THE RELEVANT PERSON

In accordance with the PDP, the Data Owner has the right for those relating to the data that;

1. learning whether they are processed,
2. if processed, request information,
3. to learn the purpose of processing and whether it is used appropriately,
4. knowing the third persons who are transferred in domestic / abroad,
5. request correction if missing / incorrectly processed or changed,
6. request to be deleted / destroyed within the framework of the conditions stipulated in Article 7 of the PDP Law,
7. requesting the third parties to whom it is transferred to be notified of the transactions carried out in accordance with paragraphs (d) and (e) listed above,
8. to object to the occurrence of a consequence, as it is exclusively analysed by automated systems,
9. in case you have suffered loss due to being committed in violation of the PDP Law, to request the elimination of damages.

Right to Access to Personal Data

Relevant persons have the right to access their Personal Data without charge. Therefore, **POLIYA** commits to provide those to the relevant person under the relevant legislation regulations;

- Learn whether Personal Data is being processed;
- Request information if Personal Data has been processed;
- Learning the purpose of processing Personal Data and whether they are used appropriately;
- The right to request to know third parties to whom Personal Data is transmitted in domestic or abroad.

Data holder's right to change and/or delete the Personal Data:

The relevant persons have the right to change or delete their Personal Data without charge. In this context;

- To request correction of Personal Data if it is incomplete or incorrectly processed;
- To request the deletion or destruction of Personal Data if the reasons for the processing of Personal Data are removed;
- To request that the above-mentioned correction, deletion or destruction be notified to third parties to whom your Personal Data has been transferred;
- To object to the occurrence of a consequence, as it is exclusively analysed by automated systems,

Keeping Personal Data Up-to-Date :

We have an obligation to ensure that your Personal Data is accurate and up-to-date as required by the PDP Law, so please keep us informed of any changes in your situation by using the e-mail address PDPk@poliya.com to keep your Personal Data accurate and up-to-date.

Application of the relevant person and evaluation of the application:

The relevant persons may, without limitation, make a request to **POLIYA** for access to Personal Data processed by **POLIYA** as soon as possible in the rights office provided by the relevant legislation and for the exercise of the above-mentioned rights. **POLIYA** creates the necessary application channels to meet these access requests. Applications shall be answered as soon as possible and in any case within the period stipulated in the law of the PDP.

The data Controller representative shall finalize the requests for the processing and Protection of Personal Data as soon as possible and in any case no later than 30 days free of charge. In any case, the relevant person may reach **POLIYA** through one of the communication channels under the previous sub-paragraph and communicate his/her demand.

For this period to begin, requests made by the persons concerned must be sent to the data representative in writing or other methods determined by the Board of the PDP and must also be fully

communicated in the documents identifying the data owner. Until a method is determined by the Board, applications must be made in writing. During the application to be made by the relevant person, the relevant person should clearly state which right he will use and send the information and documents, if any, to the Poliya Merkez Ofis Firuzk y Bulvarı No:46 Avcılar 34325 Istanbul, T rkiye (Turkey) which is the corporate address and send them via a registered letter with return.

The requests made by the relevant person are accepted by the representative of the data Controller or rejected by explaining the reasons in the legislative office and the answer is reported in written or electronic media. If the application is accepted, it will be fulfilled by **POLİYA**. In some cases, due to legal obligations or other reasons specified in accordance with Articles 5 and 6 of PDP law, no positive response is given to the request regarding the processing/modification/deletion of Personal Data. In this case, the reasons for rejection will be justified in detail and the legal basis will be reported.

In case the application is rejected by **POLİYA** in accordance with the legal regulations, the answer given is insufficient or no response is given within the time limit and the relevant person has the right to complain to the Board of the PDP within 30 (thirty) days from the date of learning of the reply and in any event within 60 (sixty) days from the date of application.

13. PUBLICATION OF THIS DATA POLICY

These data policies and rules, together with the disclosure obligation under the legal legislation, will be notified to users who have Personal Data and will be published on **POLİYA**'s web sites as well.

14. CHANGES AND UPDATES

The rights owned by the data holder in accordance with PDP are the obligations of **POLİYA**. In this context, in case of any changes or amendments are made in accordance with the economic and commercial decisions of the **POLİYA** or the legislation or the decisions of the Board of Protection of Personal Data, notifications shall be notified to the persons concerned whose data has been recorded through at least one of the existing registered contact information by e-mail, sms, voicemail and so on.

15. RIGHT TO GET INFORMATION

You can contact us at any time for any questions and comments regarding your Personal Data via the web site address kvkk@poliya.com. In addition, you can send a letter with return receipt to Poliya Merkez Ofis Firuzk y Bulvarı No:46 Avcılar 34325 Istanbul, T rkiye (Turkey) and get the information on specified matters via the preferred communication way.