

DATA PROTECTION NOTICE

1. Data Controller, Personal Data Categories, and Collection Methods

In accordance with the Law on Protection of Personal Data No. 6698 ("KVKK No. 6698"), and in case you are an European Union citizen, with the European Union General Data Protection Regulation ("GDPR") your personal data in the form of identity, communication, customer transaction, and transaction security is automatically collected from you or third parties through written data transfer in an electronic environment and processed by Ünite Bilgi Teknolojileri A.Ş. ("UNITE") as the data controller within the scope of which the details are explained below.

2. Personal Data Privacy Terms

You can access the principles that our Company complies with while ensuring data confidentiality from the Web Privacy and Personal Data Protection Terms text on our website.

3. Purposes and Legal Reasons for Processing Personal Data

Your personal data collected by us is processed for the following purposes and legal reasons.

Data Processing Purpose	Data Category	Legal Reason
Execution of activities in accordance with the legislation	Transaction Security	Article 5/2-a of KVKK No. 6698 Explicitly stipulated in the law.
Execution of information security processes	Transaction Security	
Execution of storage and archive activities	Identity, Communication, Customer Transaction, Transaction Security	Article 5/2-ç of KVKK No. 6698 Necessary for compliance with a legal obligation to which the data controller is
Execution of communication activities	Identity, Communication, Customer Transaction, Transaction Security	Article 5/1 of KVKK No. 6698 Explicit consent of the data subject
Execution of customer satisfaction processes		
Follow-up of requests/complaints		

4. Transfer of Personal Data

Your personal data may be transferred to third parties under the following conditions;

Legal Reason for Transfer	Purpose of Transfer	Transfer Party
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Article 8/2-a of KVKK No. 6698 Necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject	Transfer of necessary information to business partners for the execution of information security processes	Business Partners
Article 8/2-a of KVKK No. 6698. Necessary for compliance with a legal obligation to which the data controller is subject	Execution of activities in accordance with the legislation	Authorized Public Institutions

5. Retention Periods for Personal Data

Please find in the table below information on how long UNITE retains personal data that it processes.

Personal Data Category	Storage Period
Identity	10 years starting from the end of the legal relationship
Communication	10 years starting from the end of the legal relationship
Customer Transaction	10 years
Transaction Security	6 months

6. Personal Data Security Measures

You can access the measures taken by our Company to ensure data privacy from the Web Privacy and Personal Data Protection Terms text on our website.

7. Legal Rights of Personal Data

7.1. Rights on personal data under the KVKK No. 6698

Article 11 of the KVKK No. 6698 lists the rights that may be exercised by groups of persons as follows:

- Get information on whether or not personal data has been processed;
- Ask for information on how personal data has been processed;
- Get information on the purpose of processing personal data, and check whether or not personal data has been duly processed for this purpose;
- Learn the identity of third parties to whom personal data has been transferred in Turkey or abroad;
- Request the correction of any missing or incorrect personal data;
- Ask for the deletion or destruction of personal data in accordance with the conditions set forth in Article 7 of the KVKK, and the notification of the action

taken under the said Article to any and all third parties to whom personal data has been transferred;

- Object to any unfavorable consequence of the analysis of personal data exclusively by automated systems;
- Claim damages arising from unlawful processing of personal data.

7.2. Rights on Personal Data under the GDPR

Data subjects' rights on their personal data are set forth in the 3rd Chapter of the GDPR (from Article 12 to Article 23) as follows:

- You may withdraw your consent if your personal data is being processed based on your express consent;
- You may demand the restriction of the processing of your personal data where one of the following applies:
 - You contest the accuracy of your personal data, for a period enabling the controller to verify the accuracy of your personal data;
 - The processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
 - Your personal data are no longer needed for the purposes of the processing, but you require such data for establishment, exercise or defense of legal claims;
 - You have objected to processing pursuant to Article 21 (1) of the GDPR pending the verification whether our legitimate interests override your rights.
- You may object to the processing of your personal data if your personal data are processed for protecting public interests or based on the data controller's authority under the applicable law or the legitimate interests of the data controller or a third party, including by way of profiling;
- You have the right to access the following:
 - The verification of the processing of your personal data, the purposes of the processing and the categories of personal data concerned;
 - The recipients or categories of recipients to whom your personal data have been or will be disclosed; where possible, the envisaged period for which the personal data will be stored, or if not possible, the criteria used to determine that period;
 - The existence of the right to request the rectification or erasure of personal data or restriction of processing of personal data, and the existence of the right to lodge a complaint with a supervisory authority;
 - Any available information as to the source of your personal data, if not directly collected from you; and

- The existence of automated decision making mechanisms that we use, including profiling, meaningful information about the logic involved as well as the envisaged consequences of such processing for you, and the significant information.
- You may have your personal data transferred to you or another data controller, if that it technically possible, in an organize, usable and machine readable format, if your personal data are processed based on your express consent, or a contractual provision, by using automated mechanisms.
- You may get information on the existence of automated decision making processes, including profiling, the logic involved and their possible consequences and significance for you.

8. Application Procedures and Principles

As the data subject, you can make your requests relating to the rights by filling out the Data Subject Application Form, which you can get from our website or with your application that meets the minimum conditions stipulated in the Communiqué on Application Procedures and Principles to the Data Controller by the following methods. UNITE shall conclude demand in the request within the shortest time by taking into account the nature of the demand and at the latest within thirty days and free of charge. However, if the action requires an extra additional costs, a fee in the amount determined by the Turkish Personal Data Protection Board shall be charged by the UNITE.

Application Alternatives	Application Address
Electronic message you will send with REM	unitebilgi@hs01.kep.tr
The message you will send with your e-mail address registered in the system or with secure electronic signature and mobile signature	application@unitebt.com
Application that you submit in writing in person or through a notary public	Cumhuriyet Mah. A. İpekçi Cad. Mermer Sok. No: 4 34870 Kartal/İstanbul

9. Entry Into Force; Updates

This Data Notice entered into force upon its announcement. This Data Notice is updated from time to time in order comply with the changes in the circumstances and applicable legislation. Updated as required by the relevant Board resolutions and the circumstances, this Data Notice UNITE announces on the website.