

KOÇSİSTEM BİLGİ VE İLETİŞİM HİZMETLERİ ANONİM ŞİRKETİ

CUSTOMER PERSONAL DATA PROCESSING DISCLOSURE STATEMENT

Data Controller

In accordance with Law No. 6698 on the Protection of Personal Data (“Law”), your personal data may be processed by KoçSistem Bilgi ve İletişim Hizmetleri Anonim Şirketi, KoçDigital Çözümler Anonim Şirketi, Koç Bilgi ve Savunma Teknolojileri A.Ş., and Entegart Teknoloji Çözüm ve Hizmetler A.Ş. (together referred to as “**KoçSistem**” or “the **Company**”) as the data controller, within the scope explained below.

For detailed information on the purposes for which your personal data is processed by the Company, you may access the KoçSistem Bilgi ve İletişim Hizmetleri Anonim Şirketi Personal Data Protection and Processing Policy at:

https://www.kocsistem.com.tr/uploads/files/koc-sistem_kv_k_politikasi_5.5.24_web-sitesi.pdf

Purposes and Legal Grounds for Processing Personal Data

The personal data may be processed by the Company in accordance with the personal data processing conditions set forth in Articles 5 and 6 of the Law, for the purposes of carrying out the necessary activities by our business units to enable you to benefit from the products and services offered and to manage the related business processes, for the following purposes (“Purposes”):

Based on the necessity of processing personal data belonging to the parties of a contract, provided that it is directly related to the conclusion or performance of the contract:

- Updating customer contact information,
- Creating sales records and carrying out invoicing activities,
- Concluding and performing sales contracts arising from your purchase of the Company’s products and services,
- Providing after-sales repair, service, and support.

Based on the legal grounds that it is explicitly foreseen by law and is necessary for the data controller to fulfill its legal obligations:

- Responding to and fulfilling requests from official institutions,
- Providing information to authorized organizations as required by legislation,
- Ensuring compliance with statutory data retention obligations,
- Responding to and fulfilling data subject requests in accordance with legislation.

Based on the necessity of processing for the legitimate interests of the data controller, provided that such processing does not harm the fundamental rights and freedoms of the data subject:

- Managing customer relations,
- Conducting marketing processes for the Company’s products and services,
- Tracking and managing customer requests and complaints,

- Monitoring financial transactions,
- Organizing and managing events,
- Executing sales and marketing activities to enable individuals to benefit from the Company's products and services,
- Performing commercial activities and related business processes,
- Ensuring the legal, technical, and commercial/business security of the Company and relevant individuals with whom the Company engages in business relationships,
- Determining and implementing the Company's commercial and business strategies,
- Following up and managing legal matters,
- Managing information security processes,
- Conducting audit and ethical compliance activities,
- Planning and executing customer satisfaction and corporate communication activities,
- Conducting sweepstakes, campaigns, competitions, promotions, and advertising activities,
- Retaining personal data for the duration of the general statute of limitations to serve as evidence in possible future disputes.

Based on the necessity of processing for the establishment, exercise, or protection of a right:

- Receiving, evaluating, and resolving your requests and complaints,
- Retaining personal data for the duration of the general statute of limitations to serve as evidence in possible future disputes.

With your explicit consent:

- Processing your identity, contact, and customer transaction information for direct marketing of the Company's products and services, conducting profiling and analysis activities (including online behavioral tracking within the scope of your permission)*, and customizing/recommending products and services according to your preferences, usage habits, and needs,
- Processing your identity, contact, and customer transaction information for sending commercial electronic messages such as advertisements and promotions to the contact details you have provided.

**Your online behavioral movements on KoçSistem's websites and mobile applications and your interest in our products and services are tracked only for the marketing/analysis purposes you have permitted, provided you have given your explicit consent to the use of cookies (See KoçSistem Cookie Disclosure Statement and permissions). In addition to your explicit consent, if you allow the use of relevant cookies, your online behavioral movements and personal data will be processed for the purpose of conducting personalized marketing activities for our products and services.*

To Whom and for What Purpose the Processed Personal Data May Be Transferred

Your personal data collected by the Company may be transferred, in line with the realization of the purposes stated above, to the legal entities operating under the Company's umbrella (KoçSistem Bilgi ve İletişim Hizmetleri Anonim Şirketi, KoçDigital Çözümler Anonim Şirketi, Koç Bilgi ve Savunma Teknolojileri A.Ş., Entegart Teknoloji Çözüm ve Hizmetler A.Ş.), to our suppliers, to public institutions legally authorized under explicit provisions of applicable laws, and for the fulfillment of our legal obligations, as well as to legally authorized private persons or organizations. Such transfers are carried out within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the Law.

Method of Personal Data Collection

Your personal data is collected in order to conduct the business relationship between you and the Company and to fulfill the Purposes mentioned above; through physical means, cargo/mail, printed forms, electronically from our websites, our mobile application, our internal systems, telephone and e-mail channels.

Rights of the Data Subject as Listed in Article 11 of the Law

We hereby inform you that you have the following rights pursuant to Article 11 of the Law regarding your personal data:

- Learn whether your personal data is being processed,
- Require information regarding the particulars of processing of your personal data if it has been processed,
- Learn the purpose of processing and whether it is used in accordance with that purpose,
- Learn the third parties to whom your personal data has been transferred, domestically or abroad,
- Require the correction of your personal data if it has been processed incompletely or incorrectly, and requesting that the relevant action taken in this regard be notified to the third parties to whom your personal data has been transferred,
- Require the deletion or destruction of your personal data if the reasons requiring its processing have ceased to exist, even if it has been processed in accordance with the Law and other relevant laws, and requesting that the actions taken in this regard and if your personal data has been processed incompletely or incorrectly be notified to the third parties to whom your personal data has been transferred,
- Object to results that are detrimental to you arising from analysis of your data exclusively through automated systems,
- Request compensation for damages if you suffer harm due to unlawful processing of your personal data.

You may submit your applications regarding these rights by filling out the **Data Subject Application Form**, available at: <https://www.kocsistem.com.tr/uploads/files/veri-sahibi-basvuru-formu.pdf>

Applications will be processed free of charge as soon as possible and within thirty (30) days at the latest. However, if the process requires additional costs, a fee may be charged according to the tariff determined by the Personal Data Protection Board.