

## **INFORMATION NOTICE**

### **PREPARED PURSUANT TO PERSONAL DATA PROTECTION LAW NO. 6698**

#### **PERSONAL DATA POLICY**

##### **General Information About the Personal Data Protection Law;**

The Personal Data Protection Law No. 6698 (hereinafter referred to as “KVKK”) was adopted on 24 March 2016 and published in the Official Gazette No. 29677 dated 7 April 2016. Part of the KVKK entered into force on the date of publication, and another part on 7 October 2016.

##### **Information in the Capacity of Data Controller;**

Pursuant to the KVKK No. 6698 and in our capacity as Data Controller, your personal data may be recorded, stored, updated, disclosed/transferred to third parties where permitted by legislation, classified and processed in the ways set out in the KVKK, within the framework explained on this page.

##### **How Your Personal Data May Be Processed;**

Pursuant to the KVKK No. 6698, the personal data you share with our Company may be processed by us wholly or partly, by automated means, or by non-automated means provided that it forms part of a data recording system, by being obtained, recorded, stored, modified, reorganised — in short, by being subject to any kind of operation carried out on the data. Within the scope of the KVKK, any operation performed on data is regarded as “processing of personal data”.

##### **Purposes and Legal Grounds for Processing Your Personal Data;**

The personal data you share is processed:

- in order to perform the requirements of the services we provide to our customers in a manner appropriate to the requirements of the contract and of technology, and to improve the products and services we offer;
- in order to record identity, address and other necessary information to verify the details of the transacting party within the scope of the Law No. 6563 on the Regulation of Electronic Commerce, the Law No. 6502 on Consumer Protection, the Regulation on Service Providers and Intermediary Service Providers in Electronic Commerce published in the Official Gazette No. 29457 dated 26.08.2015 based on these regulations, the Regulation on Distance Contracts published in the Official Gazette No. 29188 dated 27.11.2014, and other relevant legislation;
- in order to organise all records and documents that will form the basis for processing in payment systems mandatory in the field of banking and electronic payment, in electronic contracts or in paper form; and to comply with the information retention, reporting and notification obligations required by legislation and prescribed by other authorities;
- in order to provide information, upon request and as required by legislation, to public prosecutors' offices, courts and relevant public officials in matters concerning public security and in legal disputes;

#### **HOW YOUR PERSONAL DATA IS COLLECTED**

Your personal data may be processed and collected:

- through forms on our Company's website and mobile applications, in the form of information such as name, surname, Turkish ID number, address, telephone, business or personal e-mail address; preferences on pages accessed using a username and

password, IP records of the transactions performed, cookie data collected by the browser, data containing browsing duration and details, and location data;

- verbally, in writing or electronically, through channels such as our sales and marketing department employees, our branches, our suppliers, other sales channels, paper forms, business cards, digital marketing and the call centre;
- from persons who share their personal data through business cards, CVs, submitting proposals and similar means — for purposes such as establishing a commercial relationship with our Company, making a job application or submitting a proposal — in a physical or virtual environment, face to face or remotely, verbally, in writing or electronically;
- furthermore, data obtained indirectly through different channels, from (micro) websites and social media used for purposes such as websites, blogs, competitions, surveys, games and campaigns; e-newsletter reading or clicking activities; data offered by publicly available databases; and publicly shared profiles and data from social media platforms.

### **Personal Data Obtained Before the KVKK Entered Into Force;**

Your personal data lawfully obtained before 7 April 2016, the effective date of the KVKK — through membership, electronic communication permission, purchase of products/services and other means — is also processed and retained in accordance with the terms and conditions set out in this document.

### **Transfer of Your Personal Data Abroad;**

Your personal data collected by any of the methods listed above, whether processed in Turkey or processed and retained outside Turkey, may also be transferred to service intermediaries located abroad (to countries accredited by the Personal Data Protection Board and offering adequate protection for personal data), provided that it remains within the scope of the KVKK and in accordance with the purposes of the contract.

### **Keeping Personal Data Up to Date and Accurate;**

Pursuant to Article 4 of the KVKK, our Company is obliged to keep your personal data accurate and up to date. In this context, in order for our Company to fulfil its obligations arising from the legislation in force, our Customers must share accurate and current data or update it via the website/mobile application.

### **Rights of the Personal Data Owner Pursuant to the KVKK No. 6698;**

Article 11 of the KVKK No. 6698 entered into force on 7 October 2016, and pursuant to that article, the rights of the Personal Data Owner after this date are as follows: By applying to our Company (the data controller), the Personal Data Owner has the right, regarding themselves, to:

- learn whether their personal data is processed,
- request information about it if their personal data has been processed,
- learn the purpose of processing the personal data and whether it is used in accordance with that purpose,
- know the third parties to whom the personal data is transferred domestically or abroad,
- request the correction of personal data in the event it has been processed incompletely or incorrectly,

- request the deletion or destruction of their personal data within the framework of the conditions stipulated in the KVKK legislation,
- request that the correction of incomplete or incorrect data and the deletion or destruction of their personal data be notified to the third parties to whom the personal data has been transferred,
- object to a result against themselves arising from the analysis of the processed data exclusively through automated systems,
- request the compensation of damages in the event they suffer damage due to the unlawful processing of personal data.

You may submit your applications and requests regarding your personal data to Juvenis Telekomünikasyon A.Ş. through the application methods mentioned in the Data Subject Application Form available on our website. Your rights requests regarding your personal data will be evaluated and finalised free of charge as soon as possible and within thirty (30) days at the latest; however, if the transaction requires an additional cost, a fee may be charged from you in accordance with the principles set out in the relevant Communiqué. Our reasoned response to your application will be sent to you at the address you specified in the application, primarily by electronic mail or post, and where possible by the method through which the request was made.

**Juvenis Telekomünikasyon A.Ş. is the Data Controller within the scope of the KVKK.**

The Data Controller Representative to be appointed by our Company will be announced in the Data Controllers' Registry and at the internet address where this document is located once the legal infrastructure is provided. Personal Data Owners may direct their questions, opinions or requests to any of the following communication channels:

**NAME/TITLE:** JUVENIS TELEKOMÜNİKASYON ANONİM ŞİRKETİ

**ADDRESS:** Barbaros Mah. Halk Cad. Kardelen Sok. No: 2/1 Kat:9 D: 39 PK: 34746  
Ataşehir/İSTANBUL

**E-MAIL:** info@juvenis.net

**TELEPHONE:** +90 (216) 519 0202