

**TOKEN FİNANSAL TEKNOLOJİLER A.Ş.  
PERSONAL  
DATA PROTECTION AND PROCESSING  
POLICY**

**06.08.2021**

**TOKEN FİNANSAL TEKNOLOJİLER A.Ş.**

**PERSONAL DATA PROTECTION AND PROCESSING INFORMATION FORM**

**Document Name:**

Token Finansal Teknolojiler A.Ş. Personal Data Protection and Processing Policy

**Target Audience**

All natural persons except employees whose personal data are processed by Token Finansal Teknolojiler A.Ş.

**Prepared by:**

Token Finansal Teknolojiler A.Ş.

**Approved by:**

Approved by Token Finansal Teknolojiler A.Ş. Senior Management.

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In cases where there is a conflict between the Turkish language version of the policy and any translation, the Turkish text should be taken into consideration.

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## 1. SECTION 1 - INTRODUCTION

### 1.1 INTRODUCTION

The protection of personal data is one of the Token Finansal Teknolojiler A.Ş.'s highest priorities. The principles adopted in the processing of personal data carried out by Token Finansal Teknolojiler A.Ş. **(the "Company")** within the scope of the Token Finansal Teknolojiler A.Ş. Personal Data Protection and Processing Policy (the **"Policy"**) and the basic principles adopted with respect to our Company's data processing activities being in compliance with the arrangements in Personal Data Protection and Processing Law Number 6698 **(the "Law")** are explained, and thus our Company provides transparency by informing the personal data subjects. Your personal data are processed and protected under this Policy with the full awareness of our responsibilities in this regard.

Our Company's activities regarding the protection of our employees' personal data are managed under the Token Finansal Teknolojiler A.Ş. Employees' Personal Data Protection and Processing Policy, which is written in parallel with the principles in this Policy.

### 1.2 SCOPE

This Policy: Relates to all personal data of persons other than employees of our Company that are processed automatically or by non-automatic means provided that they are part of any data recording system. Detailed information on the personal data subjects in question can be found in Appendix2 (*"Appendix 2 - Personal Data Subjects"*) of this Policy

### 1.3 APPLICATION OF THE POLICY AND RELEVANT LEGISLATION

The relevant legal regulations in force regarding the processing and protection of personal data shall primarily apply. If there is a discrepancy between the current legislation and the Policy, our Company accepts that the current legislation shall apply. The policy is to regulate the rules laid down by the relevant legislation within the scope of company practices.

### 1.4 POLICY'S EFFECTIVE DATE

This Policy arranged by our Company is dated [06.08.2021]. In the event that all or specific articles of the Policy are renewed, the Policy's effective date and version will be updated. The Policy is published on our Company's website ([www.tokeninc.com](http://www.tokeninc.com)) and is made available to the relevant persons at the request of the personal data subjects.

## **2. SECTION 2 - ISSUES RELATING TO THE PROTECTION OF PERSONAL DATA**

### **2.1 ENSURING SECURITY OF PERSONAL DATA**

In accordance with Article 12 of the Law, our Company takes the measures required by the nature of the data to be protected to prevent unlawful disclosure, access, transfer, or security deficiencies that may occur in different forms. In this context, our Company's Personal Data Protection Board (the "**Board**") takes administrative measures to ensure the required level of security in accordance with the guidelines published by the Company, performs inspections, or has them done.

### **2.2 PROTECTION OF SENSITIVE PERSONAL DATA**

Sensitive Personal Data: Special importance is attributed to personal data within the scope of the Law due to the risk of causing victimization or discrimination when unlawfully processed. These "sensitive" personal data are data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership of associations, foundations, or labor unions, health, sexual life, convictions and security measures, and biometric and genetic data.

In this context, the technical and administrative measures taken by our Company for the protection of personal data are implemented carefully given the nature of sensitive personal data and the necessary in-house inspections are made.

Detailed information on the processing of sensitive personal data can be found in Section 3.3. of this Policy.

### **2.3 INCREASING AND SUPERVISING BUSINESS UNITS' AWARENESS OF PERSONAL DATA PROTECTION AND PROCESSING**

Our company provides necessary training for business units to increase awareness to prevent the unlawful accessing and processing of personal data and to store data.

Our Company uses the necessary systems to raise the awareness of existing and new employees about personal data protection, and works with consultants in this regard when necessary. In this regard, our Company evaluates attendance at relevant training courses, seminars, and briefings and provides new training whenever the relevant legislation is updated.

## **3. SECTION 3 - ISSUES RELATING TO THE PROCESSING OF PERSONAL DATA**

### **3.1 PROCESSING OF PERSONAL DATA ACCORDING TO THE PRINCIPLES STIPULATED IN THE LEGISLATION**

#### **3.1.1. Processing in Accordance with the Law and the Rules of Honesty**

Personal data are processed in accordance with the general trust and honesty rule so that people's fundamental rights and freedoms are not harmed. In this context, personal data are processed to the extent required by Our Company's business activities and are limited to them.

### **3.1.2. Ensuring Personal Data is Accurate and Updated When Required**

When processing personal data, our Company takes the necessary measures to ensure that personal data are accurate and up-to-date, and provides the mechanisms needed to ensure the accuracy and currency of personal data for specific periods of time.

### **3.1.3. Processing for Specific, Clear, and Legitimate Purposes**

Our Company makes clear the purposes for which it processes personal data and with respect to business activities and it processes them for purposes relating to these activities.

### **3.1.4. Being Related, Limited, and Proportional to The Purposes for Which They are Processed**

Personal data are processed only to the extent required by our Company's business activities and this is limited to the stated goals.

### **3.1.5. Retaining Personal Data for the Period Required for the Purpose Stipulated in the Legislation or for the Purpose for Which They are Processed**

Our Company keeps personal data for the time required for the purpose for which they are processed and for the minimum period stipulated in the relevant legal legislation. In this context, our Company first determines whether a period for the retention of personal data is stipulated in the relevant legislation, and if such is the case, it follows this period. If there is no legally prescribed period, personal data are stored for the period required for the purpose for which they are processed. Personal data are disposed of at the end of the specified storage periods in accordance with the periodic destruction periods or at the data subject's request and by using the prescribed destruction methods (deletion and/or destruction and/or anonymization).

## **3.2 CONDITIONS FOR PROCESSING PERSONAL DATA**

Apart from the explicit consent of the personal data subject, just as the basis for processing personal data can be only one of the following conditions, so multiple conditions can be the basis for processing that same personal data. In the event the processed data is sensitive personal data, the conditions included under this Policy's 3.3 heading ("Processing of Sensitive Personal Data") shall apply.

### **(i) Explicit Consent of Personal Data Subject**

One of the conditions for processing personal data is the explicit consent of the data subject. The explicit consent of the personal data subject should be given on a specific subject, based on information and free will.

Should any of the following personal data processing conditions exist, personal data may be processed without the data subject's explicit consent:

### **(ii) Explicit Stipulation by Law**

If the data subject's personal data are expressly stipulated by law, in other words, if there is an explicit provision regarding the processing of personal data in the relevant law, it may be said that this data processing condition exists.

**(iii) Failure to Obtain Explicit Consent Due to De Facto Impossibility**

Personal data may be processed if the personal data of the person who is unable to disclose his/her consent due to de facto impossibility or whose consent cannot be validated is required to protect him/herself or another person's life or body integrity.

**(iv) Directly Relevant to the Establishment or Execution of a Contract**

Provided that it is directly relevant to the establishment or execution of a contract to which the data subject is a party, this condition may be deemed fulfilled if it is necessary to process personal data.

**(v) Fulfillment of Company's Legal Obligations**

If processing is necessary for our Company to fulfill its legal obligations, the personal data of the data subject may be processed.

**(vi) Personal Data Made Public by the Data Subject**

If the data subject has made his/her personal data public, the relevant personal data may be processed in a limited way for the purpose of making it public.

**(vii) Data Processing is Necessary for the Establishment, Use, or Protection of a Right**

If data has to be processed for the establishment, use, or protection of a right, the personal data of the data subject may be processed.

**(viii) Data Processing Is Necessary For The Legitimate Interest Of Our Company**

If the data processing is necessary for our Company's legitimate interests, the personal data of the data subject can be processed, provided that it does not harm the fundamental rights and freedoms of the personal data subject.

### **3.3 PROCESSING SENSITIVE PERSONAL DATA**

Sensitive personal data are processed by our Company in accordance with the principles specified in this Policy and by taking all necessary administrative and technical measures, including the methods to be determined by the Board, should the following conditions exist:

- (i) **Sensitive personal data other than health and sexual life may be processed without the express consent of the data subject if this is explicitly stipulated by law**, in other words, if there is an explicit provision in the relevant law regarding the processing of personal data. Otherwise, the explicit consent of the data subject is to be obtained.
- (ii) **Sensitive personal data regarding the data subject's health or sexual life** may be processed without express consent by those persons or authorized organizations obligated to secrecy in order to protect public health, conduct preventative medicine, medical diagnosis, treatment, or care services, or the planning and managing of health care services and their financing. Otherwise, the explicit consent of the data subject is to be obtained.

### 3.4 INFORMING THE PERSONAL DATA SUBJECT

In accordance with Article 10 of the Law and secondary legislation, our Company as the data controller informs personal data subjects of who is processing their personal data, for what purposes, with whom they are being shared and for what purposes, what methods were used to collect the data, the legal basis, and their rights regarding the processing of their personal data.

### 3.5 TRANSFER OF PERSONAL DATA

Our company may transfer the personal data and sensitive personal data of personal data subjects to third parties (third-party companies, group companies, natural third persons) by taking the necessary security measures in line with the lawful purposes of processing personal data. In this respect, our Company acts in accordance with the regulations of Article 8 of the Law. Detailed information about this topic can be found in the document in APPENDIX 4 of this Policy ("*APPENDIX 4 - Third Persons to Whom Personal Data is Transferred by Our Company and Transfer Purposes*").

#### 3.5.1. Transfer of Personal Data

Even if the personal data subject has not given his/her explicit consent, if one or more of the following conditions are present, personal data may be transferred to third persons by our Company by taking all due care and all necessary security precautions including those stipulated by the Board:

- The relevant activities regarding the transfer of personal data are clearly stipulated in the laws;
- The transfer of personal data by the Company is directly relevant to and necessary for the establishment or execution of a contract;
- The transfer of personal data is necessary for our Company to fulfill its legal obligations;
- The transfer of personal data by our Company in a limited way for the purpose of making it public, provided that it has been made public by the data subject;
- The transfer of personal data by the Company is necessary for the establishment, use, or protection of the rights of the Company or the data subject or third parties;
- Engaging in personal data transfer activities is necessary for the Company's legitimate interests provided this does not harm the data subject's fundamental rights and freedoms;
- When a person who cannot provide his/her express consent due to de facto impossibility or whose consent cannot be authenticated has to protect his/her life or bodily integrity or that of someone else.

In addition to the above, personal data may be transferred to foreign countries declared to have adequate protection by the Board if any of the conditions in ("**Foreign Countries With Adequate Protection**") are met. In the absence of adequate protection, personal data may be transferred to foreign countries that have the Board's permission and where the data controllers in Turkey and the relevant countries have pledged adequate protection in writing in accordance with the conditions for the transfer of data stipulated in the legislation ("**Foreign Countries Where Data Controllers Have Pledged Adequate Protection**").



### 3.5.2. Transfer of Sensitive Personal Data

Sensitive personal data may be transferred by our Company in accordance with the principles specified in this Policy and by taking all necessary administrative and technical measures, **including the methods to be determined by the Board, should the following conditions exist:**

**(i) Sensitive personal data other than health and sexual life may be processed without the express consent of the data subject if this is explicitly stipulated by law,** in other words, if there is an explicit provision in the relevant law regarding the processing of personal data. Otherwise, the explicit consent of the data subject is to be obtained.

**(ii) Sensitive personal data regarding the data subject's health or sexual life** may be processed without express consent by those persons or authorized organizations obligated to secrecy in order to protect public health, conduct preventative medicine, medical diagnosis, treatment, or care services, or the planning and managing of health care services and their financing. Otherwise, the explicit consent of the data subject is to be obtained.

In addition to the above, personal data may be transferred to **Foreign Countries with Adequate Protection** should any of the above conditions exist. In the absence of adequate protection, personal data may be transferred to **Foreign Countries Where the Data Controller Has Pledged Adequate Protection** and where the data controllers in Turkey and the relevant foreign country have pledged adequate protection in writing in accordance with the conditions for the transfer of data stipulated in the legislation.

## 4. SECTION 4 - CATEGORIZATION OF PERSONAL DATA PROCESSED BY OUR COMPANY AND PURPOSES OF PROCESSING

In our Company, personal data are processed in accordance with the general principles stated in the Law including the principles stated in Article 7 of the Law relating to the processing of personal data, based on and limited to at least one of the conditions for processing personal data stated in Articles 5 and 6 of the Law in accordance with the our Company's purposes for processing personal data, by informing the data subjects in accordance with Article 10 of the Law and secondary legislation. The categories of personal data processed according to the purposes and conditions stated in this Policy, and detailed information about these categories can be found in Appendix 3 of the *Policy* ("Appendix 3 - Personal Data Categories").

Detailed information regarding the purposes of processing personal data in question can be found in Appendix 1 of the *Policy* ("Appendix 1- Purposes of Processing Personal Data").

## 5. SECTION 5 STORAGE AND DISPOSAL OF PERSONAL DATA

Our Company keeps personal data for the time required for the purpose for which they are processed and for the minimum period stipulated in the relevant legal legislation. In this context, our Company first determines whether a period for the retention of personal data is stipulated in the relevant legislation, and if such is the case, it follows this period. If there is no legally prescribed period, personal data are stored for the period required for the purpose for which they are processed. Personal data are disposed of at the end of the specified storage periods in accordance with the periodic destruction periods or at the data subject's request and by using the prescribed disposal methods (deletion and/or destruction and/or anonymization).

## **6. SECTION 6 - RIGHTS OF PERSONAL DATA SUBJECTS AND THE EXERCISE OF THESE RIGHTS**

### **6.1 RIGHTS OF THE PERSONAL DATA SUBJECT**

Personal data subjects have the following rights:

- (1) To find out whether personal data has been processed or not;
- (2) To request information if his/her personal data have been processed;
- (3) To learn the purpose of processing personal data and whether they are used in line with this purpose;
- (4) To learn the third parties to whom personal data are transferred domestically or abroad;
- (5) To request correction of personal data that have been incompletely or inaccurately processed and to request that the third parties to whom the data were transferred be notified of the action taken in this regard;
- (6) To request the deletion or destruction of her/his personal data in the event that the reasons for their retention no longer exist despite their having been processed in accordance with the Law and the provisions of other relevant laws, and to request that the third parties to whom the data were transferred be notified of the action taken in this regard;
- (7) To object to any adverse consequences arising as a result of processed data being analyzed solely by automatic systems;
- (8) To claim compensation for any harm caused by the unlawful processing of personal data.

### **6.2. EXERCISE OF THE PERSONAL DATA SUBJECT'S RIGHTS**

Personal data subjects may forward their requests regarding their rights as listed in section 6.1.' (*"Rights of Personal Data Owner"*) to our Company using the methods determined by the Board. Accordingly, they may make use of the Data Subject Application Form available at <https://www.tokeninc.com/TokenEcommerce/media/Token/pdf/Token-Data-Subject-Application-Form.pdf>

### **6.3 OUR COMPANY'S RESPONSE TO APPLICATIONS**

Our Company takes the necessary administrative and technical measures in accordance with the Law and secondary legislation to conclude applications made by personal data subjects.

In the event that personal data subjects duly forward their request regarding their rights under Section 6.1. (*"Rights of the Personal Data Subject"*), our Company shall conclude the relevant request in the shortest time possible depending on the nature of the request and no later than 30 (thirty) days, free of charge. However, if the process requires an additional cost, fees may be charged in accordance with the tariff determined by the Board.

## APPENDIX 1 - Purposes of Processing Personal Data

MAIN PURPOSES (PRIMARY)	SUB-PURPOSES (SECONDARY)
<b>Planning and execution of the company's human resources policies and processes</b>	Planning of Human Resources Processes
	Execution of staff recruitment processes
	Planning and execution of internship, student placement, and operational processes
<b>To have the activities required for the execution of the Company's commercial operations performed by our relevant business units, alongside the execution of the relevant business processes</b>	Activity management
	Planning and execution of business activities
	Planning and execution of supply chain management processes
	Planning and execution of granting business partners and suppliers authority to access information
	Tracking financial and accounting affairs
	Planning and execution of purchasing processes
	Planning and execution of corporate communication activities
	Planning and execution of corporate governance activities
	Planning and execution of production and operation processes
	Planning and execution of activities for the analysis of the effectiveness/productivity and appropriateness of business activities
	Planning, supervision, and execution of information security processes
	Planning and execution of corporate sustainability activities
	Planning and execution of logistics activities
	Planning and execution of business continuity activities
Creating and managing IT infrastructure	
Planning and execution of social responsibility and civil society activities	
<b>Having our relevant business units carry out the work needed for data subjects to benefit from the goods and services offered by the Company and carrying out the relevant business processes</b>	Planning and execution of after-sales support activities
	Tracking contract processes and legal requests
	Tracking customer requests and complaints
	Planning and execution of customer relations management processes
	Managing relations with business partners and suppliers
	Planning and execution of the processes for the sale of goods and services
<b>Planning and execution of the company's commercial and business strategies</b>	Planning and execution of external training activities
	Execution of strategic planning activities
	Managing relations with business partners and suppliers

<p><b>Suggesting to data subjects the goods and services offered by the Company by personalizing them according to the relevant data subject's preferences, usage habits, and needs, and planning and execution of activities required for the promotion of the Company</b></p>	Planning and execution of the processes for the marketing of goods and services
	Using consumer behavior criteria to detect and evaluate people to be the subject of marketing activities
	Planning and execution of activities for improving and developing user experience with respect to goods and services
	Design and execution of personalized marketing and promotional activities
	Planning and execution of the Company's production and operational risk processes
	Design and execution of advertising, promotional, and marketing activities in digital and other media
	Planning and execution of data analytics studies for marketing purposes
	Planning and execution of customer satisfaction activities
	Design and execution of activities to be developed for gaining customers and creating value in existing customers in digital and other media
	Planning and execution of market research activities for the sale and marketing of goods and services,
	Planning and execution of activities for brand communication and reputation
	Planning and execution of the processes for creating and increasing loyalty to the goods and services offered by the Company
	Organizing contests/sweepstakes for marketing activities and ensuring customer satisfaction
	Planning and execution of activities related to business continuity
	<p><b>Ensuring the legal, technical, and commercial-business security of the Company and data subjects who have a business relationship with the Company</b></p>
Planning and execution of the operational activities required to ensure that the Company's activities are carried out in compliance with the Company procedures and/or relevant legislation	
Ensuring the security of company operations	
Ensuring that data are accurate and up-to-date	
Planning and execution of the Company's financial risk processes	
Planning and execution of company audit activities	
Carrying out of transaction relating to company and partnership law	
Providing the authorities with information based on legislation	
Tracking legal affairs	
Ensuring the security of company premises and facilities	
Planning and execution of occupational health and safety processes	
Planning and execution of activities related to business continuity	
Provision, supervision, and execution of security for the Company's fixtures and resources	
Planning and execution of emergency management processes	

## APPENDIX 2 - Personal Data Subjects

PERSONAL DATA SUBJECT CATEGORIES	REMARKS
<b>Customer</b>	Natural persons who use or have used the goods and services offered by our Company, regardless of whether they have any contractual relationship with our Company
<b>Potential Customer</b>	Natural persons who have requested or shown interest in using our goods and services or who have been evaluated in accordance with the rules of commercial practice and integrity as being likely to show interest
<b>Visitor</b>	Natural persons who have entered our physical premises for various reasons or have visited our websites
<b>Third Party</b>	Third-party natural persons (E.g. guarantor, family members, and relatives) who have relations with the parties mentioned above to ensure the security of commercial transactions between our Company and said parties, to protect their rights, and afford advantage or other natural persons who are not covered by this Policy and the Token Finansal Teknolojiler A.Ş. Policy for the Protection and Processing of Employees' Personal Data
<b>Job Seeker</b>	Natural persons who have applied via any means for a job in our Company or have submitted their personal background and related information for review by our Company
<b>Company Shareholder</b>	Natural persons who are the shareholders in our Company
<b>Company Official</b>	Board members of our Company and other authorized natural persons
<b>Employees, Shareholders, and Officials of the Institutions We Collaborate With</b>	Natural persons employed by the organizations that our Company has any business relationship with (including but not limited to business partners, authorized service, suppliers, etc.) and these organizations' shareholders and officials

### APPENDIX 3 - Personal Data Categories

PERSONAL DATA SUBJECT CATEGORIES	REMARKS
<b>Identity Information</b>	These are the data containing information about the identity of the person: documents such as driver's license, ID card, and passport that contain such information as name-surname, TR ID number, nationality information, mother's name-father's name, place of birth, date of birth, and gender as well as information such as tax number, SGK number, vehicle license plate, etc.
<b>Contact Information</b>	Telephone number, address, e-mail, fax number
<b>Location Information</b>	Information that determines the location of the personal data subject while using our goods and services or that of the employees of the organizations we collaborate with when they are using our Company's vehicles
<b>Customer Information</b>	Information obtained and produced about the data subject as a result of our commercial activities and operations carried out by our business units in this context
<b>Family Members and Relatives</b>	Information about the data subject's family members and relatives relating to the goods and services we offer within the scope of our Company's operations or to protect the Company's and the data subject's legal and other interests
<b>Customer Transaction Information</b>	Information such as instructions and requests required by the customer to use our goods and services as well as records of the use of our goods and services held within the data recording system and clearly belonging to a natural person with an identity that has been or can be determined.
<b>Physical Premises Security Information</b>	Personal data relating to documents and records such as camera records, finger print records, and records etc., taken at the security checkpoint on entrance to the physical premises and during the stay inside the physical premises and that are held within the data recording system and that clearly belong to a natural person with an identity that has been or can be determined
<b>Transaction Security Information</b>	Your personal data (e.g. log records) processed to ensure our technical, administrative, legal, and commercial security while conducting our business activities
<b>Risk Management Information</b>	Personal data processed through methods used in accordance with the generally accepted legal and commercial practice and good faith in these fields so we can manage our commercial, technical, and administrative risks
<b>Financial Information</b>	Processed personal data relating to information, documents, and records showing all sorts of financial outcome generated depending on the type of legal relationship formed between our Company and the personal data subject as well as information such as bank account number, IBAN number, credit card information, financial profile, wealth data, income information, etc., processed partially or fully automatically or non-automatically as part of a data recording system and that clearly belongs to a natural person with an identity that has been or can be determined

<b>Personal Information</b>	All kinds of personal data processed to obtain information that will be the basis of the personal rights of natural persons who are in a working relationship with our Company
<b>Job Seeker Information</b>	Personal data processed about individuals who have applied for a job at our Company or who have been evaluated as prospective employees in line with our Company's human resources requirements or who have a working relationship with our Company in line with the rules of commercial practice and honesty
<b>Sensitive Personal Data</b>	Personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership of associations, foundations or trade-unions, information relating to health, sexual life, convictions and security measures, and the biometric and genetic data
<b>Marketing Information</b>	Personal data processed for the marketing of our goods and services by personalizing it according to the data subject's usage habits, preferences, and needs as well as reports and evaluations made as a result of this processing
<b>Request/Complaint Management Information</b>	Personal data regarding the receipt and evaluation of any request or complaint directed to our Company
<b>Visual and Audio Data</b>	Photograph and camera recordings (excluding recordings covered by Physical Premises Security Information), audio recordings and data in documents that are effectively copies of documents containing personal information, clearly belonging to a natural person with an identity that has been or can be determined
<b>Audit and Inspection Information</b>	This means personal data processed during internal or external audit activities within the scope of our Company's legal obligations and compliance with Company policies.
<b>Legal Procedure and Compliance</b>	Personal data processed within the scope of detecting and tracking our legal receivables and rights, the discharge of our liabilities, and compliance with our legal obligations and our Company's policies

#### **APPENDIX 4 - Third Persons to Whom Personal Data is Transferred by Our Company and Purposes of Transfer**

In accordance with Articles 8 and 9 of the Law, our Company may transfer customers' personal data to the following categories of people:

- (i) Shareholders
- (ii) Business Partners
- (iii) Suppliers
- (iv) Affiliates
- (v) Legally Authorized Private Persons
- (vi) Legally Authorized Public Institutions and Organizations
- (vii) Koç Group Companies
- (viii) Members of the Board of Directors

The scope of the abovementioned persons to whom the transfer is made and the purposes of data transfer are stated below.

<b>Persons to Whom Data May be Transferred</b>	<b>Definition</b>	<b>Purpose of Data Transfer</b>
<b>Business Partner</b>	Companies with whom we collaborate to sell our company's goods or services in a specific region and carry out other transactions	As limited to ensure the fulfillment of the purposes of establishing the business partnership
<b>Supplier</b>	Parties providing services to our Company in line with our Company's data processing purposes and instructions within the scope of conducting our Company's commercial activities	As limited to the purpose of providing our Company with the services outsourced to a supplier by our Company and necessary to carry out our Company's commercial activities
<b>Affiliates</b>	Companies that our Company has shares in and controls	As limited to ensure the execution of commercial activities that require the participation of our Company's affiliates
<b>Our Shareholders</b>	Koç Holding Anonim Şirketi, which is authorized to design strategies and auditing activities relating to our Company's commercial activities in accordance with the provisions of the relevant legislation	As limited to designing strategies relating to our Company's commercial activities in accordance with the relevant legislation and for auditing purposes



<b>Legally Authorized Public Institutions and Organizations</b>	Public institutions and organizations authorized to receive information and documents from our Company in accordance with the relevant legislation such as the Capital Markets Board, the Energy Market Regulation Authority, or the Turkish Competition Authority	As limited to the purpose requested by the relevant public institutions and organizations within their legal authority
<b>Legally Authorized Private Persons</b>	This means institutions and organizations established in line with specific, lawfully determined conditions in accordance with the provisions of relevant legislation and that continue their activities again with the framework determined by the law (such as banks and independent auditors).	The personal data shared are limited to those topics that fall within the scope of the activities conducted by the relevant private institutions and organizations.
<b>Koç Group Companies</b>	(You can find the list of Koç Group Companies at <a href="http://www.koc.com.tr/en">www.koc.com.tr/en</a> )	Limited to evaluation purposes within other Koç Group Companies during the hiring of personnel and with the explicit consent of the data subject
<b>Members of the Board of Directors</b>	Members of the Board of Directors	Limited to carrying out the activities of the Company's Board of Directors