



UNIFREE DUTY FREE İŞLETMECİLİĞİ A.Ş.

POLICY OF PROTECTION AND PROCESSING OF PERSONAL DATA

KVK\_32

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## 1. Introduction

Pursuant to Article 20 of the Constitution of the Republic of Türkiye, everyone has the right to request the protection of their personal data. This right includes being informed about personal data concerning oneself, accessing such data, requesting its correction or deletion, and learning whether it is being used for its intended purposes.

The Turkish Personal Data Protection Law No. 6698 (“**KVKK**”) regulates the protection of fundamental rights and freedoms of individuals in the processing of personal data and the procedures and principles to be followed by natural and legal persons processing personal data. The purpose of this Policy, prepared in line with this, is to ensure compliance with the obligations under KVKK .

The purpose of this Policy is to protect the personal data of guarantors, customers, visitors, suppliers and third parties governed by the Policy. The protection of our employees' personal data is governed by the Unifree Duty Free İşletmeciliği Anonim Şirketi Policy on the Processing of Employees' Personal Data, which is written in line with the principles of this Policy.

In the event of any conflict between the KVKK and other relevant legislation and the Unifree Duty Free İşletmeciliği Anonim Şirketi Personal Data Protection and Processing Policy, the legislation in force shall prevail.

## 2. Purpose

The Personal Data Protection and Processing Policy ('Policy') of Unifree Duty Free İşletmeciliği Anonim Şirketi ('Company') has been prepared with the aim of protecting the fundamental rights and freedoms of individuals, particularly the privacy of their private lives, in the processing of personal data, and to regulate the procedures and principles to be followed by natural and legal persons processing personal data in accordance with their obligations.

The Policy adopts the principle that the activities carried out by the Company shall be conducted and developed in accordance with the principles set out in the KVKK.

## 3. Scope

Data subjects whose personal data is processed within the scope of this Policy are categorised as follows:

|                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Customers</b>                        | Natural persons whose personal data is obtained in the context of business relationships within the scope of activities carried out by the Company, regardless of whether there is a contractual relationship or not.                                                                                                                                                                                                                                                                                                  |
| <b>Third Parties</b>                    | Third-party natural persons associated with the aforementioned parties (e.g., guarantors, escorts, family members, and relatives) for the purpose of ensuring the security of commercial transactions between our Company and the aforementioned parties or protecting the rights and securing the interests of the aforementioned persons, or all natural persons whose personal data our Company is required to process for a specific purpose, even if not explicitly stated in the Policy (e.g., former employees) |
| <b>Job Applicant / Intern Applicant</b> | Natural persons who have applied for a job with our Company in any way or who have made their CV and relevant information available for review by our Company                                                                                                                                                                                                                                                                                                                                                          |

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| <b>Employees, Shareholders, and Officials of Institutions with Which We Collaborate</b> | Natural persons who are employees, shareholders, and authorised representatives of institutions with which our Company has any kind of business relationship (business partners, suppliers, etc., but not limited to these |
| <b>Visitor</b>                                                                          | Natural persons who have entered the physical facilities owned by our Company or where it organises events (offices, etc.) for various purposes, or who visit our websites                                                 |

#### 4. Definitions

The definitions used in this Policy are as follows:

|                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Explicit consent</b>                    | Consent based on information and freely given in relation to a specific subject                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Anonymisation</b>                       | Personal data being rendered in such a way that it cannot be associated with an identified or identifiable natural person, even when combined with other data                                                                                                                                                                                                                                                                                         |
| <b>Supplier</b>                            | Natural persons who provide products or services to the Company                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Personal health data</b>                | Any information relating to the physical and mental health of an identified or identifiable natural person and information relating to the health services provided to that person                                                                                                                                                                                                                                                                    |
| <b>Processing of personal data</b>         | The collection, recording, storage, preservation, alteration, reorganisation, disclosure, transfer, acquisition, retrieval, classification or use of personal data, whether fully or partially automated or non-automated, provided that it forms part of a data recording system , alteration, reorganisation, disclosure, transfer, acquisition, making available, classification, or restriction of use, and any other operation performed on data |
| <b>KVKK</b>                                | Turkish Personal Data Protection Law No. 6698                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>KVKK Authority</b>                      | Personal Data Protection Authority                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>KVKK Board</b>                          | Personal Data Protection Board                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Special categories of personal data</b> | Personal data relating to a person's race, ethnic origin, political opinion, philosophical belief, religion, denomination or other beliefs, attire, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, as well as biometric and                                                                                                                                                |
| <b>TCK</b>                                 | Turkish Criminal Code No. 5237                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Data processor</b>                      | A natural or legal person who processes personal data on behalf of the data controller, based on the authority granted by the data controller                                                                                                                                                                                                                                                                                                         |
| <b>Data subject</b>                        | The natural person whose personal data is processed, referred to as the "data subject" under the KVKK.                                                                                                                                                                                                                                                                                                                                                |

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| <b>Data Subject Request Form</b>    | The application form to be used by data subjects whose personal data is processed within the Company when exercising their rights set forth in Article 11 of the KVKK.                                                                                                                                       |
| <b>Data controller</b>              | The natural or legal person who determines the purposes and means of processing personal data and is responsible for establishing and managing the data recording system                                                                                                                                     |
| <b>Register of Data Controllers</b> | The register of data controllers maintained by the Presidency under the supervision of the Personal Data Protection Board                                                                                                                                                                                    |
| <b>Data inventory</b>               | The inventory created and detailed by the Company, linking its personal data processing activities carried out in accordance with its business processes to the purposes of personal data processing, the recipient group to which personal data is transferred, and the relevant personal data owner group. |

## 5. General Principles Regarding the Processing of Personal Data

Pursuant to Article 3 of the KVKK, any operation performed on personal data, such as the collection, recording, storage, retention, alteration, reorganisation, disclosure, transfer, acquisition, making available, classification, or restriction of use of such data, whether fully or partially automated or non-automated provided it forms part of a data recording system, falls within the scope of the processing of personal data.

The following principles must be adhered to in the processing of personal data:

- a) **Compliance with the law and rules of good faith**  
Our company processes personal data in accordance with the Constitution, the KVKK and related legislation, and in compliance with the law and rules of good faith.
- b) **Accuracy and, where necessary, timeliness**  
While processing personal data, our company takes all necessary administrative and technical measures to ensure the accuracy and up-to-date nature of personal data.
- c) **Processing for specific, explicit and legitimate purposes**  
Our company clearly and definitively determines the purpose of processing personal data before commencing any processing activities.
- d) **Processing that is relevant, limited, and proportionate to the purpose**  
Our company processes personal data only to the extent necessary to achieve the specified purposes. Data processing activities are not carried out on the assumption that the data may be used later.
- e) **Retention for the period required by the relevant legislation or necessary for the purpose for which they are processed**  
Our company stores personal data for a period limited to that required by the KVKK and related legislation or necessary for the purposes of the data processing activity.

## 6. Conditions for Processing Personal Data

Our company may process personal data and special categories of personal data with the explicit consent of the data subject or, in the cases stipulated in Articles 5 and 6 of the KVKK, without explicit consent.

### 6.1. Processing of Personal Data

Our company conducts its personal data processing activities in accordance with the data processing conditions set out in Article 5 of the KVKK:

- a) It is expressly provided for by the laws.

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b) It is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid.

c) Processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract.

ç) It is necessary for compliance with a legal obligation to which the data controller is subject.

d) Personal data have been made public by the data subject himself/herself.

e) Data processing is necessary for the establishment, exercise or protection of any right.

f) Processing of data is 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.

Your special categories of personal data is collected, stored and processed based on the following legal grounds:

a) Data subject has given his/her explicit consent,

b) It is explicitly provided by laws,

c) It is necessary for the protection of life or physical integrity of the person himself/herself or of any other person who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid,

ç) It relates to personal data that have been made public by the data subject, and processing is in consistent with data subject's intention to make such data public,

d) It is necessary for the establishment, exercise or protection of any right,

e) It is necessary for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, and for the planning, management and financing of health-care services by persons subject to legal obligation of confidentiality or by competent public institutions and organizations,

f) It is necessary for the fulfilment of legal obligations in the fields of employment, occupational health and safety, social security, social services, and social assistance,

g) It relates to the current or former members and affiliates of foundations, associations, and other non-profit organizations established for political, philosophical, religious, or trade union purposes, or to individuals who are in regular contact with these organizations, provided that such processing complies with the applicable legislation governing these organizations and their objectives, is limited to the organizations' fields of activity, and does not involve disclosure of data to third parties.

## 6.2. Processing of Special Categories of Personal Data

Our company processes special categories personal data, which carries the risk of creating discrimination when processed unlawfully, in accordance with the data processing conditions set out in Article 6 of the KVKK.

Processing of special category personal data is lawful under these conditions;

a) Data subject has given his/her explicit consent,

b) It is explicitly provided by laws,

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- c) It is necessary for the protection of life or physical integrity of the person himself/herself or of any other person who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid,
- ç) It relates to personal data that have been made public by the data subject, and processing is in consistent with data subject's intention to make such data public,
- d) It is necessary for the establishment, exercise or protection of any right,
- e) It is necessary for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, and for the planning, management and financing of health-care services by persons subject to legal obligation of confidentiality or by competent public institutions and organizations,
- f) It is necessary for the fulfilment of legal obligations in the fields of employment, occupational health and safety, social security, social services, and social assistance,
- g) It relates to the current or former members and affiliates of foundations, associations, and other non-profit organizations established for political, philosophical, religious, or trade union purposes, or to individuals who are in regular contact with these organizations, provided that such processing complies with the applicable legislation governing these organizations and their objectives, is limited to the organizations' fields of activity, and does not involve disclosure of data to third parties.

### 6.3 Legal Grounds for the Processing of Your Personal Data

We process your personal data within the framework of the legal grounds set forth in Article 5 of the KVKK, in particular the Turkish Commercial Code No. 6102, the Turkish Code of Obligations No. 6098, the Tax Procedure Law No. 213, electronic commerce legislation, and other applicable legislation, as follows:

- o Where your explicit consent is required under the KVKK and other applicable legislation, based on your consent (we would like to remind you that you may withdraw your consent at any time) (Bu durumda rızanızı istediğiniz zaman geri çekebileceğinizi hatırlatmak isteriz)
- o Where permitted by applicable legislation in any caseWhere permitted by applicable legislation in any case
- o Where processing is mandatory for the protection of the vital interests of any person
- o Where it is necessary for the establishment of a contract with you, the performance of the contract, and the fulfillment of our obligations arising from a contract
- o Where it is necessary for the fulfillment of our legal obligations,
- o Where your personal data has been made public by you
- o Where data processing is mandatory for the establishment or protection of a right, for the exercise of our legal rights, or for the defense against legal claims brought against us
- o Where processing is necessary for our legitimate interests, provided that it does not harm your fundamental rights and freedoms.

### 7. Ensuring the Security and Confidentiality of Personal Data

In accordance with Article 12 of the KVKK, our Company takes all necessary technical and administrative measures to ensure an appropriate level of security in order to prevent the unlawful processing of personal data it processes, to prevent unlawful access to personal data, and to ensure the safeguarding of personal data.

#### 7.1. Technical Measures Taken to Ensure the Lawful Processing of Personal Data and to Prevent Unlawful Access to Personal Data



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Our Company has taken all technical and technological security measures to protect your personal data and has safeguarded such data against potential risks. The measures taken are listed below:

- Taking technical measures to the extent permitted by technological developments
- Employing experts in technical fields
- Conducting audits at regular intervals to monitor the implementation of the measures taken
- Establishing the necessary software and infrastructure to ensure security
- Establishing the necessary software and infrastructure to ensure security
- Using a legally compliant backup program to ensure the secure storage of personal data
- Using software that includes antivirus protection systems

## **7.2. Administrative Measures Taken to Ensure the Lawful Processing of Personal Data and to Prevent Unlawful Access to Personal Data**

- Training and raising awareness of Company employees regarding the KVKK,
- Ensuring that contracts executed with parties to whom personal data is transferred include provisions requiring the recipient of personal data to fulfill data security obligations,
- Identifying the requirements to be fulfilled for compliance with the KVKK and preparing internal policies for their implementation,

## **7.3. Measures to Be Taken in Case of Unlawful Disclosure of Personal Data**

In the event that processed personal data is obtained by others through unlawful means, our Company shall notify the relevant data subject and the KVKK Authority as soon as possible.

## **8. Purposes and Retention Periods of Personal Data Processing**

### **8.1. Purposes of Personal Data Processing**

Personal data may be processed by Unifree Duty Free İşletmeciliği Anonim Şirketi within the scope of the purposes set forth below and may be retained for the periods stipulated by such purposes and the applicable legal time limits.

#### **Purposes of Personal Data Processing**

- Operation of Unifree Duty Free shops and execution of commercial processes in this context
- Performing the activities for which the Company is responsible within the scope of legal and administrative obligations,
- Informing the data subject of changes in legislation or in the rules and policies adopted within the Company,
- Investigating, detecting, reporting, and preventing unlawful acts, as well as managing and conducting activities subject to legal proceedings,
- Protecting legitimate interests,
- Negotiating, establishing, and performing contracts,
- Conducting assessments within the scope of requests and inquiries and providing feedback to the relevant person,
- Carrying out promotional activities, conducting surveys and polls, obtaining the opinions of data subjects, and ensuring customer/employee satisfaction,
- Increasing efficiency by ensuring workflow and coordination among departments,
- Assessing candidates' suitability for the relevant position within the scope of job applications, candidate evaluation, and recruitment processes, and communicating with such candidates and persons related to the application,
- Recording visitor entries and conducting cargo tracking,

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- Ensuring the security of digital systems and physical premises owned by or used by the Company and taking necessary measures by carrying out relevant assessments,
- Carrying out the necessary activities by business units to enable customers to benefit from the products and services offered,
- Planning and executing corporate sustainability activities,
- Conducting corporate law transactions,
- Ensuring the legal and commercial security of persons having a business relationship with the Company,  
Conducting commercial activities for the purposes of determining and implementing commercial and business strategies.

## 8.2. Retention Periods of Personal Data

We retain your personal data only for the period necessary to fulfill the purpose for which it was collected. These periods are determined separately for each business process, and at the end of the relevant periods, if there is no other reason requiring us to retain your personal data, we delete your personal data in accordance with the KVKK.

When determining the destruction periods of your personal data, we take the following criteria into consideration:

- The period generally accepted as common practice in the sector in which the data controller operates, within the scope of the purpose of processing of the relevant data category,
- The duration of the legal relationship established with the data subject that necessitates the processing of the personal data included in the relevant data category,
- The period during which the legitimate interest to be obtained by the data controller, depending on the purpose of processing of the relevant data category, remains valid in accordance with the law and the principles of good faith,
- The period during which the risks, costs, and liabilities arising from the storage of the relevant data category, depending on the purpose of processing, will continue to exist under the law,
- Whether the maximum period to be determined is suitable for keeping the relevant data category accurate and up to date when necessary,
- The period during which the data controller is obliged to retain the personal data included in the relevant data category due to its legal obligations,
- The statute of limitations period determined for the assertion of a right related to the personal data included in the relevant data category by the data controller.

## 9. Deletion, Destruction, and Anonymization of Personal Data

Pursuant to Article 7 of the KVKK, even if personal data has been processed in accordance with the relevant legislation, where the reasons requiring such processing cease to exist, personal data shall be deleted, destroyed, or anonymized by our Company, either ex officio or upon the request of the data subject.

The procedures and principles regarding this matter shall be carried out in accordance with the KVKK and the secondary legislation to be enacted based on this Law.

### 9.1. Techniques for the Deletion and Destruction of Personal Data

Although personal data may have been processed in accordance with the relevant legislative provisions, our Company may delete or destroy such personal data, either ex officio or upon the request of the data subject, where the reasons requiring its processing cease to exist. The deletion or destruction techniques most frequently used by our Company are listed below:

|                                                                                   |                                                         |                  |            |
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#### **a. Physical Destruction**

Personal data may also be processed through non-automatic means, provided that it forms part of a data recording system. In the deletion/destruction of such data, a method is applied whereby the personal data is physically destroyed in a manner that renders it impossible to be used again.

#### **b. Secure Deletion via Software**

When deleting/destroying data that is processed wholly or partially through automatic means and stored in digital environments, methods are used to delete the data from the relevant software in a manner that makes it impossible to recover.

#### **c. Secure Deletion by an Expert**

In certain cases, our Company may engage an expert to delete personal data on its behalf. In such cases, the personal data is securely deleted/destroyed by a person who is an expert in this field, in a manner that makes it impossible to recover.

### **9.2. Techniques for the Anonymization of Personal Data**

This refers to rendering personal data impossible to associate with an identified or identifiable natural person in any manner whatsoever, even by matching it with other data.

#### **a. Data Masking**

Data masking is a method of anonymizing personal data by removing the key identifying information from the data set.

Example: Transforming a data set into one in which the identification of the data subject becomes impossible by removing information such as name, Turkish Identification Number, etc., that enables the identification of the data subject.

#### **b. Aggregation**

Through the data aggregation method, multiple data points are aggregated, and personal data is rendered unrelatable to any individual.

Example: Presenting that there are y customers aged x, without displaying the ages of customers individually.

#### **c. Data Derivation**

Through the data derivation method, a more general content is generated from the content of personal data, thereby ensuring that the personal data cannot be associated with any individual.

*Example:* Indicating ages instead of dates of birth; indicating the region of residence instead of the full address.

#### **d. Data Mixing**

Through the data mixing method, the link between values and individuals is severed by mixing the values within a personal data set.

*Example:* Altering the characteristics of audio recordings so that the voices cannot be associated with the data subject.

### **10. Third Parties to Whom Personal Data Is Transferred and Purposes of Transfer**

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The procedures and principles applicable to the transfer of personal data are regulated under Articles 8 and 9 of the KVKK, and the personal data and special categories of personal data of the data subject may be transferred to third parties located domestically and abroad. For the performance of services, your personal data may be shared, including but not limited to, with third parties from whom the Company receives services, contracted institutions, lawyers for the purpose of resolving legal disputes, natural and legal persons with whom we have a power of attorney relationship, our business partners, and other third parties, in cases required by the Law and other relevant legislation, secondary legislation related to such laws, regulations of supervisory and regulatory authorities, and circumstances mandated by public authorities. However, in any case, except for statutory exceptions, personal data may not be transferred without the explicit consent of the data subject.

#### **10.1.Domestic Transfer of Personal Data**

In accordance with Article 8 of the KVKK, the domestic transfer of personal data shall be possible provided that one of the conditions specified in Section 6 of this Policy titled "Conditions for the Processing of Personal Data" is fulfilled.

#### **10.2.Transfer of Personal Data Abroad**

In accordance with Article 9 of the KVKK, where personal data is transferred abroad, in addition to the fulfillment of the conditions applicable to domestic transfers, the existence of one of the following is required:

- Where there is an adequacy decision issued by the Authority regarding the country to which the transfer will be made, the sectors within that country, or international organizations, personal data may be transferred abroad by data controllers and data processors.
- Provided that the data subject has the opportunity to exercise his/her rights and to apply to effective legal remedies in the country to which the transfer will be made, one of the appropriate safeguards specified below is ensured by the parties
  - a) The existence of a non-international agreement concluded between public institutions and organizations or international organizations abroad and public institutions and organizations or professional organizations having the status of public institutions in Türkiye, and the authorization of the transfer by the Board.
  - b) The existence of binding corporate rules, approved by the Board, which contain provisions on the protection of personal data and which the companies within a group of undertakings engaged in joint economic activity are obliged to comply with.
  - c) The existence of a standard contract announced by the Board, containing provisions on matters such as data categories, purposes of data transfer, recipients and recipient groups, technical and administrative measures to be taken by the data recipient, and additional measures taken for special categories of personal data.
  - ç) The existence of a written undertaking containing provisions that will ensure adequate protection, and the authorization of the transfer by the Board.
- The standard contract shall be notified to the Authority by the data controller or data processor within five business days following its execution.
- In the absence of an adequacy decision and where none of the appropriate safeguards stipulated in the fourth paragraph can be ensured, data controllers and data processors may transfer personal data abroad only on an incidental basis and solely in the presence of one of the following circumstances:
  - a) Where the data subject gives explicit consent to the transfer, provided that he/she is informed about the possible risks.
  - b) Where the transfer is mandatory for the performance of a contract between the data subject and the data controller, or for the implementation of pre-contractual measures taken at the request of the data subject.

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c) Where the transfer is mandatory for the establishment or performance of a contract to be concluded between the data controller and another natural or legal person for the benefit of the data subject.

ç) Where the transfer is mandatory for an overriding public interest.

d) Where the transfer of personal data is mandatory for the establishment, exercise, or protection of a right.

e) Where the transfer of personal data is mandatory for the protection of the life or physical integrity of the data subject or another person who is unable to express his/her consent due to actual impossibility or whose consent is not legally valid.

f) Where the transfer is made from a registry that is open to the public or to persons with a legitimate interest, provided that the conditions required under the relevant legislation for access to such registry are met and the transfer is requested by a person having a legitimate interest.

The provisions set forth in other laws regarding the transfer of personal data abroad are reserved.

### 10.3.Groups of Persons to Whom Personal Data Is Transferred by Our Company

In accordance with Articles 8 and 9 of the KVKK and within the scope of this Policy, our Company may transfer the personal data of data subjects to the person groups listed below for the purposes specified:

| DATA SUBJECT GROUPS                                             | DEFINITION                                                                                                                                                                                                                                                                                                                                                                                                                                                         | PURPOSE OF TRANSFER                                                                                                                                                                                                                                                                              |
|-----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Legally Authorized Public Institutions and Organizations</b> | Official and administrative authorities such as the Airport District Governorship, Free Zone Directorate, Customs Directorate, General Directorate of State Airports Authority (DHMI), Directorate General of Civil Aviation (DGCA), Turkish Statistical Institute (TURKSTAT), Turkish Employment Agency, Ministry of Family, Labour and Social Services of the Republic of Türkiye, Social Security Institution, District Health Directorate, and municipalities. | Limited to the purpose requested within the scope of the authority of the relevant public institutions and organizations, and for the fulfillment of obligations such as notification, reporting, and similar requirements before such institutions, and for the satisfaction of their requests. |
| <b>Legally Authorized Private Law Persons</b>                   | Private law persons authorized to obtain information and documents from our Company in accordance with the relevant legislative provisions                                                                                                                                                                                                                                                                                                                         | Limited to the purpose requested within the scope of the legal authority of the relevant private law persons.                                                                                                                                                                                    |
| <b>Service Providers</b>                                        | Companies providing cloud computing services or database services, and servers.                                                                                                                                                                                                                                                                                                                                                                                    | Limited to the purpose of ensuring that functions and services are carried out in the most efficient manner and in accordance with up-to-date technologies.                                                                                                                                      |

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| <b>Professional Consultants</b> | <ul style="list-style-type: none"> <li>• Banks</li> <li>• Insurance companies</li> <li>• Auditors</li> <li>• Lawyers</li> <li>• Accountants</li> <li>• Transportation companies</li> <li>• Warehouses</li> <li>• Cargo companies</li> <li>• Service providers</li> <li>• Travel agencies</li> </ul> | Limited to the purposes of conducting business activities, carrying out tender processes, conducting mediation and arbitration proceedings, and managing our relationships with our suppliers. |
|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## 11. Company's Obligation to Inform

In accordance with Article 10 of the KVKK, our Company is required to inform data subjects at the time personal data is collected. Within this scope, our Company fulfills its obligation to inform on the following matters:

- The title of our Company as the data controller,
- The purposes for which personal data will be processed,
- To whom and for what purposes the processed personal data may be transferred,
- The method and legal basis of personal data collection,
- The rights of the data subject.

## 12. Rights of Data Subjects and Exercise of These Rights

In accordance with Article 13 of the KVKK, the evaluation of data subjects' rights and the notifications to be made to data subjects are carried out through this Policy as well as the Unifree Duty Free İşletmeciliği Anonim Şirketi Data Subject Application Form. Data subjects may submit their complaints or requests regarding the processing of their personal data to our Company in accordance with the principles set forth in the relevant form.

### 12.1 Right of Application

Pursuant to Article 11 of the KVKK, any person whose personal data is processed may apply to our Company and submit requests regarding the following matters concerning himself/herself:

- To learn whether his/her personal data is processed,
- To request information if his/her personal data has been processed,
- To learn the purpose of the processing of his/her personal data and whether such data is used in accordance with its purpose,
- To learn the third parties to whom his/her personal data is transferred, domestically or abroad,
- To request the correction of his/her personal data in case it is processed incompletely or inaccurately, and to request that the transaction carried out within this scope be notified to the third parties to whom the personal data has been transferred,
- To request the deletion, destruction, or anonymization of his/her personal data where the reasons requiring the processing thereof no longer exist, and to request that the



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transaction carried out within this scope be notified to the third parties to whom the personal data has been transferred,

- g. To object to the occurrence of a result against the data subject arising from the analysis of his/her processed personal data exclusively through automated systems,
- h. To claim compensation for damages in case he/she suffers damage due to the unlawful processing of his/her personal data.

## 12.2. Cases Outside the Scope of the Right of Application

Pursuant to Article 28 of the KVKK, data subjects shall not be entitled to assert their rights in the following cases:

- a. Where personal data is processed by natural persons solely within the scope of activities relating entirely to themselves or to family members living in the same household, provided that such data is not disclosed to third parties and that obligations regarding data security are complied with,
- b. Where personal data is processed for purposes such as research, planning, and statistics by rendering it anonymous for official statistical purposes,
- c. Where personal data is processed for artistic, historical, literary, or scientific purposes, or within the scope of freedom of expression, provided that such processing does not violate national defense, national security, public security, public order, economic security, the privacy of private life, or personal rights, and does not constitute a criminal offense,
- d. Where personal data is processed within the scope of preventive, protective, and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public security, public order, or economic security,
- e. Where personal data is processed by judicial authorities or enforcement authorities in relation to investigation, prosecution, adjudication, or execution proceedings.

Pursuant to Article 28, paragraph 2 of the KVKK, data subjects shall not be able to assert their rights (excluding the right to claim compensation for damages) in the following cases:

- a. Where the processing of personal data is necessary for the prevention of a crime or for a criminal investigation.
- b. Where personal data has been made public by the data subject himself/herself.
- c. Where the processing of personal data is necessary for the performance of supervisory or regulatory duties by authorized and competent public institutions and organizations or professional organizations having the status of public institutions, based on the authority granted by law, or for disciplinary investigations or prosecutions.
- d. Where the processing of personal data is necessary for the protection of the State's economic and financial interests with respect to budgetary, tax, and financial matters.

## 12.3.Procedure for Responding

In accordance with Article 13 of the KVKK, our Company shall conclude the applications submitted by the data subject, depending on the nature of the request, as soon as possible and in any event within 30 (thirty) days, free of charge.

The application of the data subject may be rejected in the following cases:

- a. Where it prevents the rights and freedoms of others
- b. Where it requires disproportionate effort
- c. Where the information is publicly available
- d. Where it endangers the privacy of others
- e. Where one of the circumstances excluded from the scope pursuant to the KVKK exists

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### **13 Personal Data Processing Activities Carried Out Within the Company and Data Processing Activities Conducted on the Website**

#### **13.1. Camera Surveillance Within the Company**

Camera surveillance is carried out within our Company in order to protect the security-related interests of our Company and other individuals.

In accordance with the regulations set forth in the KVKK, this Policy regarding camera surveillance is published on our website, and notice signs indicating that surveillance is being conducted are posted at the entrances of the areas where monitoring takes place.

No surveillance is conducted in areas that may result in interference with an individual's privacy. Access to security camera recordings is limited to a restricted number of our Company employees and, where necessary, employees of the security company acting as a supplier. The individuals who have access to such recordings declare, through the confidentiality undertakings they have signed, that they will protect the confidentiality of the data they access.

#### **13.2. Customer Entry and Exit Records of Company Visitors**

Personal data processing activities are carried out for the purpose of tracking the entry and exit of guests visiting our Company. While the name and surname information of individuals visiting our Company is obtained, such data is processed solely for this purpose, and the relevant personal data is recorded in a filing system in physical form.

#### **13.3. Retention of Records Relating to Internet Access Provided to Company Visitors**

During the time you remain within our buildings and facilities, internet access is provided to visitors upon request. In this case, log records relating to your internet access are recorded in accordance with the mandatory provisions of Law No. 5651 and the legislation enacted pursuant to this Law. Such records are processed solely upon request by authorized public institutions and organizations or for the purpose of fulfilling our relevant legal obligations during internal audit processes carried out within our Company. Access to the log records obtained within this framework is limited to a restricted number of our employees who are bound by confidentiality undertakings. Our employees who have access to these records may access them only for use in response to requests from authorized public institutions and organizations or within audit processes, and such records are shared solely with persons who are legally authorized..

#### **13.4. Website Visitors**

In order to enable visitors to our Company's website to carry out their visits in a manner appropriate to their purposes, to display customized content to them, and to conduct online advertising activities (by technical means such as cookies), internet activity within the website is recorded. Detailed explanations regarding these activities of our Company are provided in the Privacy Policy texts available on our website.

This Policy may be revised by the Company where deemed necessary. In cases where revisions are made, the most up-to-date version of the Policy will be made available on the Company's website.