

## **Privacy Notice for Customers**

### **1. Introduction**

Unifree Duty Free İşletmeciliği A.Ş. (hereinafter referred as “Unifree” or “Company”) is committed to protecting the privacy and security of your personal data. In accordance with the Personal Data Protection Law No. 6698 (“LPPD”) and the European Union General Data Protection Regulation (“GDPR”), your personal data is under the protection of Unifree, which is the data controller under KVKK and GDPR. The Company takes the necessary technical and administrative measures, using its technological and infrastructure facilities, to ensure that personal data is legally processed and securely stored within the framework of LPPD and GDPR.

### **2. Scope**

Unifree provides airport shopping experience in various airports. As Unifree, we collect data of international passenger which purchase goods from the Duty Free goods stores operated by Unifree.

This notice applies to all customers of Unifree in İstanbul Airport, Dalaman, Dereköy and Kosovo. It will be reviewed periodically and may be updated from time to time to ensure continued compliance and to reflect best practice.

This notice should be read in conjunction with our corporate Data Protection Policy.

### **3. Identity of the data controller**

Unifree is a data controller in respect of the personal data it collects and otherwise processes about you during its transactions with you. As a data controller, Unifree is legally responsible for processing your personal data in accordance with the General Data Protection (EU) 2016/679 and Turkish Law on Protection of Personal Data No. 6698.

### **4. What information do we collect about you?**

**4.1** Personal data means any information about an individual from which that person can be identified. It does not include any anonymous data.

We collect, store and otherwise process the following personal information about you:

- **Personal Identification:** Name, surname, boarding pass number, passport number.
- **Billing information:** Billing address, credit card information obtained through the credit card terminals while making the transaction, receipt information.
- **Information contained in Customer Complaints:** Name, last name, method in which you contacted us, such as your social media account, email address or telephone number and the content of the complaint.
- **CCTV Footages** in stores.

## 5. How and in which method do we collect your information?

We collect your personal information directly from you either through our transaction or your complaints and feedbacks. This information is collected either as hard copies by hand or via electronic means such as e-mail.

## 6. What are the purposes for using your personal information and its legal basis?

| 6.1 | Legal Basis   | Purpose  |
|-----|---|--|
| 1.  | We will collect, store, and use personal information about you as this information is necessary for entering into or for the performance of the contractual agreement with Unifree pursuant to Article 5/2 (c) of the LLPD. | <ul style="list-style-type: none"> <li>▪ Payment information to complete the transaction</li> <li>▪ Order details to complete the transaction</li> </ul> |
| 2.  | We will process your personal information as it might be necessary to fulfill our legal obligations pursuant to Article 5/2 (ç) of the LLPD   | <ul style="list-style-type: none"> <li>▪ Keeping financial records (receipts of payments) for financial auditing</li> </ul>                              |
| 3.  | We will process your information in pursuit of our legitimate interests   | <ul style="list-style-type: none"> <li>▪ Respond to and defend against legal claims.</li> </ul>  |

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|  | <p>provided that your fundamental rights and freedoms are not harmed or prejudiced pursuant to Article 5/2 (f) of the LLPD.</p> | <ul style="list-style-type: none"> <li>▪ Information obtained through customer complaints.</li> <li>▪ Collection of CCTV footages for the safety of our stores and prevention of crime.</li> </ul> |
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**6.2 We offer higher level of protection standards while processing your special categories of personal data. The legal basis and purposes for processing special categories of personal data include the following:**

|    | Legal Basis   | Purpose  |
|----|---|--|
| 1. | <p>We process special categories of your personal data in order to comply with our legal obligations to Article 5/2 (ç) of the LLPD.</p>  | <ul style="list-style-type: none"> <li>▪ Respond to and defend against legal claims.</li> <li>▪ CCTV footages to maintain safety and security in our facilities. (These footages may reflect a medical condition such as prescribed glasses or a disability.)</li> </ul> |
| 2. | <p>In the duty-free stores operated by our company, the provisions of the Customs Law No. 4458 and the Customs Regulation covering the Customs Warehouse Regime and the Duty-Free Shops Regulation published in the Official Gazette No. 26318 of 13.10.2006, and Tax Law No. 213 are applied. Sales are made in accordance with the provisions the aforementioned legislation, the decisions and</p> | <ul style="list-style-type: none"> <li>▪ Name, surname, boarding pass number, passport number.</li> </ul>  |

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|    | instructions of the authorized administrative authorities. We process your personal data pursuant to Article 5/2 (ç) of the LLPD to fulfill our legal requirements.  |   |
| 3. | Rarely, we may process this type of personal information where it is necessary for your or another individual's vital interest and you or the other individual is not capable of giving consent pursuant to Article 6 of LPPD. | <ul style="list-style-type: none"> <li>▪ In cases of emergency regarding yourself or another individual.</li> </ul> |

### **7. What happens if the above-mentioned purposes change?**

We will only use your personal information for the purposes for which we collected it. unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

### **8. What happens if you do not provide your personal information?**

Whilst, the majority of information you provide is mandatory, some of it is provided to us on voluntary basis. In order to comply with the GDPR, we will inform you whether you are required to provide certain information to us or if you have a choice in this. We do not collect more information than we need to fulfil our above-stated purposes and will not retain it for longer than is necessary.

If you fail to provide mandatory information when requested, we may not be able to enter into or perform the contract we have entered into with you (such as offering you our products or services), or we may be prevented from complying with our legal obligations (such as to compliance with the health and safety of requirements or keeping financial records.).

**9. Consent**

In limited circumstances, we might request your explicit written consent to allow us to process particular personal information. In such a case, we will provide you full detail of the information we would like to collect and the reason why we need it, so that you can carefully consider whether you wish to consent. Please be informed that, whether you agree to provide your consent is not a condition of your contractual relationship with us.

**10. Automated Decision - Making**

We do not use automated decision - making methods.

**11. Who will have access to your personal information?**

**11.1 Internal Operations:** We may share your personal information internally for the purposes of operational and business activities with the accounting, finance and business management departments. In certain cases where the information technology department needs to access certain files to perform their obligations, they may get access to your personal information, provided that necessary safeguards to protect your personal information are in place.

**11.2 Third Party Access:** We may share your personal information with third parties. All of the third-party service providers are required to take appropriate administrative and technical safeguards to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We permit them to process your personal data only for specified purposes and in line with our instructions.

We share your personal information with the following third parties for stated purposes:

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| Administrative authorities such as <i>Airport Administrative Authority, Directorate of Free Zone, Customs Directorate, State Airports Authority, Directorate General of Security</i> | In the duty-free stores operated by our company, the provisions of the Customs Law No. 4458 and the Customs Regulation covering the Customs Warehouse Regime and the Duty-Free |
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|                                      | Shops Regulation published in the Official Gazette No. 26318 of 13.10.2006, and Tax Law No. 213 are applied. Sales are made in accordance with the provisions the aforementioned legislation, the decisions and instructions of the authorized administrative authorities. |
| Legal consultant                     | We receive legal support from a third party and may share your personal information with the consultant in case of a dispute in order to initiate a claim or defend ourselves against a claim.   |
| Financial consultants                | We receive third party support for financial auditing purposes. We may share your receipt information with these consultants.  |
| Information and technology companies | We receive third party support for our IT services, including information security. They may need to get access to certain information in order to fulfil their duties.  |

**11. 3 Transfer outside the European Economic Area:** We will collect your personal information in Turkey, which is outside the European Economic Area. There is no adequacy decision about Turkey, made by the European Commission. This means that Turkey is not deemed to have adequate level of protection for your personal information.

However, we took the appropriate safeguards to ensure that your personal information receives adequate level of protection. Your personal information is treated by our headquarters in Turkey in the same way it is in the European Union, in line with the GDPR and U.K. data protection laws. We ensured this by adopting standard data protection clauses adopted by the European Commission with our headquarters.

If you request further information about the safeguards or a copy of the safeguard, please contact [KVKK@unifree.com.tr](mailto:KVKK@unifree.com.tr).

## **12. How long will Unifree retain your personal information?**

We will retain your personal information only for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal and accounting requirements.

Your information is stored in electronic and physical platforms; within our archives, company servers and accounting programs.

## **13. What are your data protection rights?**

We respect your data protection rights and are committed to ensure fair and transparent processing. We would like to make sure that you are aware of your data protection rights:

**13.1 Right to request access:** You have a right to access and have copies of your personal information. We may charge a reasonable fee for this service.

**13.2 Right to request rectification:** You have a right to request us to correct any inaccurate personal information about you or to complete any incomplete one.

**13.3 Right to request erasure:** You have a right to request erasure of your personal information under certain conditions.

**13.4 Right to request restriction of processing:** You have a right to request restriction on processing of your personal information, under certain conditions.

**13.5 Right to object processing:** You have a right to object processing of personal data about you, under certain conditions.

**13.6 Right to request data portability:** You have a right to receive your personal information in a structured, commonly used and machine-readable format and have the right to transmit those to another controller, under certain conditions.

**13.7 Right to file a complaint** with a supervisory authority: You have a right to file a complaint with the supervisory authority.

**13.8 Right to withdraw your consent:** If you provided consent for us to process your personal information for any particular reason, you have the right to remove your consent at any time by contacting the [KVKK@unifree.com.tr](mailto:KVKK@unifree.com.tr) Removal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

#### **14. How will you use your data protection rights?**

If you wish to exercise any of your data protection rights or to discuss anything about this notice, you can contact us at our email: [KVKK@unifree.com.tr](mailto:KVKK@unifree.com.tr) We will respond to your requests within a month.

For further details about our data protection operations, please refer to our Data Protection Policy at <https://www.unifree.com.tr/kvk/>

For independent advice on data protection you may also contact the Turkish Data Protection Authority.