

GENERAL DISCLOSURE ON PROCESSING PERSONAL DATA

Herein with this statement, Retail Omni Reklam Danışmanlık Bilgi Teknolojileri Ltd. Şti. (“the Company”) shall inform you and explain the activities related to processing personal data as per the 10th article of Personal Data Protection Law (“PDP Law”) no. 6698

Our Company pays strict attention to the security of your personal data as the Data Controller. Having that awareness, we are extremely cautious in processing, recording, saving all kinds of personal data belonging to all persons related to the Company and our employees for the following purposes in conformity with law and ethics as well as transferring to/briefing 3rd parties limited by the purpose of processing within the framework of the limitations permitted by the legislation with the full comprehension of our responsibility.

Purposes of Processing Your Personal Data

Your personal data obtained by our Company are kept physically or electronically for a time period befitting processing purposes in accordance with the basic principles stipulated in PDP Law and processed for the execution of operational activities of our Company, business relations and human resources processes, responding to the needs of relevant persons, ensuring the commercial safety of the Company. The Company acts in conformity with the liabilities stipulated mainly in PDP Law and other relevant legislations.

Processed Personal Data – To whom and for what purposes can the processed personal data be

As per the purposes mentioned above, your processed personal data can be transferred to our business partners, shareholders, legally authorized state institutions and organizations, private persons, in order to carry out operational activities of our Company and to independent audit firms, survey firms within the framework of legal obligations and limitations within the scope of data processing conditions and purposes stated in 8 th and 9th articles of PDP Law and in conformity with the basic principles stipulated in PDP Law.

Methods and Legal Grounds of Collecting Personal Data

Your personal data are being collected by the Company for the purposes stated above through all kinds of verbal, written or electronic communication channels to carry out our business operations. The collected data are processed and transferred within the context of personal data processing conditions and purposes stated in 5th and 6th articles of PDP Law as well as for the purposes stated above.

Your Rights as the Personal Data Subject Listed in 11th Article of PDP Law

In the event that you would submit your requests related to your rights to the Company as data subjects with the procedures mentioned below herein this General Disclosure, the Company shall conclude the requests included in the application free of charge and as soon as possible considering the nature of the request and within 30 (thirty) days at the latest.

The rights as the data subject pursuant to the 11th article of PDP Law are as follows:

- Learn whether her/his personal data have been processed or not;
- Request information as to processing if her/his data have been processed;
- Learn the purpose of processing of the personal data and whether data are used in accordance with their purpose;
- Know the third parties in the country or abroad to whom personal data have been transferred; Request rectification in case personal data are processed incompletely or inaccurately and request notification of the operations made to third parties to whom personal data have been transferred;
- Request deletion or destruction of personal data in case the reasons necessitating their processing cease to exist even if the personal data that is processed in accordance with PDP Law or relevant other laws and request notification of the operations made to third parties to whom personal data have been transferred;
- Object to occurrence of any result that is to her/his detriment by means of analysis of personal data exclusively through automated systems;
- Request compensation for the damages in case the person incurs damages due to unlawful processing of personal data.

You can convey your request relating to the use of rights stated above in writing or by other means designated by the Personal Data Protection Committee to our Company. You can deliver a letter of request indicating which of the rights stated in 11 th article of PDP Law you would like to use to our Company address by hand, through a notary public or other methods specified in PDP Law, or send as an e-mail with secure signature at info@pupahouse.com.