

**ECZACIBAŞI GAYRİMENKUL GELİŞTİRME VE YATIRIM A.Ş**  
**PROTECTION AND PROCESSING OF PERSONAL DATA**  
**POLICY**

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## **Eczacıbaşı Gayrimenkul Geliştirme ve Yatırım A.Ş**

### **The Policy on the Protection and Processing of Personal Data**

The Policy on the Protection and Processing of Personal Data of Eczacıbaşı Gayrimenkul Geliştirme ve Yatırım A.Ş. ("the **Policy**") covers declarations and explanations of the Company on the processing by Eczacıbaşı Gayrimenkul Geliştirme ve Yatırım A.Ş. (the "**Company**") of Personal Data owned by real persons other than the Company employees, including notably candidate employees and customers, in accordance with the Law on the Protection of Personal Data (LPPD) ("the **Law**").

Our Company reserves the rights to amend the Policy for the purpose of providing the current information on our practices and legal arrangements regarding the protection of Personal Data. If material changes are made in the Policy, the Data Subjects shall be informed through various channels.

The issues regarding the Processing by our Company of Personal Data belonging to the employees whose Personal Data are being processed are regulated under the Policy on the Protection and Processing of Personal Data of Employees of Eczacıbaşı Gayrimenkul Geliştirme ve Yatırım A.Ş.

The definitions of the concepts used in this Policy are listed in ANNEX-1 taking also into account the legislation on the protection of personal data.

#### **1) Principles on Data Privacy**

Our Company acts in accordance with the below mentioned general principles in all its activities involving Processing of Personal Data.

**Acting in compliance with the law and rules of integrity:** Our Company acts in accordance with the effective legislation and abides by the rules of integrity in all Processing of Personal Data processes.

**Accuracy and currency:** Our Company offers the Data Subjects the opportunity to update their Personal Data, and takes the necessary measures to ensure the transfer of data into databases in an accurate manner.

**Processing for specific, clear and legitimate purposes:** Our Company limits the processing of Personal Data to certain and legitimate purposes, and informs the Data Subjects clearly through disclosure texts in relation to such purposes.

**Being connected with, limited to and commensurate with the purposes of processing:** The Personal Data are processed by our Company to the extent necessary for, in connection with, and limited to, the purpose which, at the time of acquisition, was notified to the Data Subject.

**Storage of data for a period stipulated by the respective legislation or required for the processing purpose:** Our Company keeps the Personal Data for a certain period of time if such time is stipulated by the effective legislation. If the legislation does not stipulate any time period, then our Company determines reasonable periods of storage taking into account

the purpose of use and the procedures of our Company, and the data are kept for such period of time. Upon expiry of such period, the data are deleted, destroyed or anonymized in accordance with the procedures of our Company.

## **2) Your Personal Data Being Collected**

The Personal Data being collected by our Company changes depending on the nature of the relationship with our Company and the legal obligations.

The personal data collected can be listed as follows:

- Identity Data (identification number of the Republic of turkey, name-surname, passport number, the information written on the identity card if the identity card has been shared, photograph etc. which may vary to the extent necessary)
- Contact Details (E-mail Address, phone number, mobile phone number:, address etc.)
- Location Data (location data that may be acquired while using our services that are connected with the person, notably in mobile apps, or while using our company cars, etc.)
- Customer Data (customer number associated with the person, customer income details, customer profession details, license-plate number, education data, etc.)
- Information on Family Members and Relatives (particularly in relation to candidate employees, the identification data, contact details, and professional and educational information about Data Subject's kids, spouse, etc.)
- Customer Transaction Data (CDR (call detail record) related to an order or request which is connected with the person, call center records, credit card account statements, pay-desk receipts, customer orders, and records entered in relevant channels, etc.)
- Physical Environment Security Data (access-entry records, visit data, camera recordings, etc.)
- Transaction Security Data (website password and code data, etc.)
- Risk Management Data (CRB inquiry results and records connected with the Data Subject, address registration system records, IP address monitoring records, etc.)
- Financial Information (credit card debt in line with any information received from official authorities in the case of a legal prosecution, loan amount, loan payments, amount and rate of interest payable, outstanding debt, amount of receivables, etc.)
- Employee Candidate Data (curriculum vitae, interview notes, personality test results, etc.)
- Legal Transaction and Compliance Information (data contained in documents such as court orders or administrative authority decisions, etc.)
- Audit and Inspection Data (information about any any records and proceedings related to teh Data Subject, which will enable us to initiate legal proceedings and assert our rights, etc.)
- Sensitive Personal Data (membership of any association, society, trade union, data related to health, conviction, and security measures)
- Marketing Data (habits of the person which may be correlated with the Data Subject and used for marketing purposes, reports and assessments showing his/her likes, targeting data, cookie records, data enrichment activities, data and assessments obtained through surveys conducted with the person, satisfaction questionnaires, campaigns, and direct marketing efforts.)
- Request/Complaint Management Data (data and records collected in relation to the person's requests and complaints about the products and services connected with the

person, and reports in which the consequences of these are evaluated by the relevant business units, etc.)

- Reputation Management Information (information connected with the person and collected for the purpose of protecting our commercial reputation, etc.)
- Audiovisual Data (photographs, camera recordings, audio records, etc.)

The list of Personal Data types above is not exhaustive, and data similar to those listed can also be processed by our Company.

### **3) Our Purposes of Processing of Personal Data**

The Personal Data collected can be processed by our Company in the scope of the conditions of Processing Personal Data as set forth in articles 5 and 6 of the Law; and

- In the framework of designing, coordinating, developing, executing commercial activities specific to the Company, and planning and implementing activities aimed at business development;
  - To make necessary notification of legally-required transactions/entries, execution of obligations, communication with official institutions, and to inform the competent authorities
  - To form and implement contracts, execute, plan, manage and carry out relations with customers, and to perform post-contract services
  - To follow up, plan and execute outsourcing of services/consultancy, etc.
  - To plan, monitor and perform activities relating to finance and accounting
  - To conduct strategic planning activities
  - To perform, plan and execute activities/developments and analysis regarding access to the systems
  - To plan and execute information technologies and data security activities
  - To plan and execute activities for developing, following up and controlling commercial business, efforts, and operations
  - To conduct reporting in relation to control, data management, analysis, and social activities, process developments and similar activities
  - To plan and execute crisis and emergency management processes
  - To plan and execute actions relating to the physical/electronic security of the Company
- In the framework of designing and executing activities regarding customization, profiling, promotion and marketing of products and services;
  - To plan and execute actions aimed at increasing the level of perception about the entity, the entity's activities and the brand
  - To plan and perform operations aimed at advertising, sales and marketing toward the customers
  - To plan, manage and execute organizations, meetings, invitations and events
  - To conduct appreciation, loyalty, profiling and satisfaction studies and analyses related to products and services
  - To plan and execute campaigns and promotions for customers/participants
  - To plan and carry out activities aimed at implementing and/or customizing products and services by analyzing usage habits and trends of the customers/participants
  - To plan and conduct market research activities for the products and services
- In the framework of designing and/or executing request and complaint management and after-sales processes;

- To plan and execute request and complaint management activities aimed at collection, evaluation and resolution of requests and complaints
- To carry out operation, research, analysis and reporting efforts aimed at establishing contractual relationships with, or renewing contracts with the customers
- To execute and follow up transactions and activities aimed at fulfilling obligations arising from after-sales services and contractual relationships
- In the framework of planning, executing and managing corporate relationships;
  - To manage, develop, plan and carry out relations with suppliers/dealers/business partners
  - To design, develop and execute corporate governance and communication activities
  - To plan and/or conduct activities regarding the provision of business continuity
  - To plan and execute external training/scholarship/sponsoring activities
  - To conduct strategic planning activities
- In the framework of ensuring the legal, technical and commercial-occupational safety of the Company and any persons who have a business relationship with the Company, and carrying out activities aimed at fulfilling the legal obligations;
  - To plan, execute and follow up organizational structuring for the execution of the company's operations in accordance with the corporate policies, instruction, articles of association and the relevant legislation
  - To inform the competent authorities and institutions due to the legal obligation and/or fulfill the activities and obligations regarding the inspections
  - To guarantee the security of physical and/or electronic environments of the Company and its premises, and the parties with whom the Company has a relations
  - To keep the records of persons who participate in organizations and events
  - To keep the records of parties with whom the Company has a business relationship, and to plan and execute listing efforts
  - To take actions to ensure that the correct and up-to-date data are kept
  - To plan and/or execute occupational health and/or safety processes
  - To plan and execute operations and studies relating to any visitor who accesses-leaves the Company in accordance with the law
  - To organize, plan, execute and inspect the efforts dealing with the commercial security of the Company and/or the people with whom the Company has a business relationship.

#### **4) Storage of Personal Data**

While determining the periods of storage for personal data, our Company takes into account the effective legislation and the purpose of processing the data in question. In this framework, if a legal time bar exists in relation to the obligations relating to Processing of Personal data, such time bar is certainly taken into account. If the purpose of Processing Personal Data ceases to exist, then, in the absence of any other legal reason or grounds for keeping the Personal Data, the personal data are either deleted, destroyed or anonymized.

#### **5) Transfer of Personal Data**

Your Personal Data can be shared with the parties that provide products or services to or on behalf of our Company and our suppliers and business partners with whom we have a cooperation with abroad and at home, and who externally supply us with services or support with a view to making you benefit from the products and services within the boundaries of the purposes explained above. Your Personal Data can be shared with legally competent public authorities and private person in the scope of their authorities. Under such circumstances

when your Personal data are shared, our Company takes the necessary measures to ensure that the party with whom the data are shared conduct the processing and transfer activities in accordance with the rules of this Policy and the provisions laid down in the legislation.

Your Personal Data can also be subject to a transfer when the control over our company changes partially or completely through a share sale, merger, demerger or undergoes a change of company type. If your Personal Data are transferred under such circumstances, the necessary steps shall be taken to ensure that the party to whom the data have been transferred acts in accordance with the rules of processing and transfer herein mentioned.

The transfer of your Personal Data to overseas can only take place if;

- An Explicit Consent exists;
- Any one or more of the conditions of data processing specified in the Law is or are met;
- Necessary degree of protection is present in the country to which the data is transferred; or
- Where no sufficient protection is present in the country where the data is transferred, the Data Controller in the relevant foreign country and our Company jointly undertake in writing to provide sufficient protection, and the permission of the Personal Data Protection Board is obtained.

## **6) Data Security**

Our Company takes reasonable technical and administrative measures to prevent unauthorized access risks, accidental loss of data, deliberate deletion or damage of data to guarantee the security of your Personal Data.

Within this context, our Company;

- Records access to Personal Data,
- Ensures data security by using software and hardware including virus protection systems and firewalls,
- Follows up personal data processing activities on a business unit basis,
- Ensures that necessary audits are conducted in order to ensure implementation of the provisions of Article 12 of the Law,
- Ensures that the Company's internal policies and procedures and data processing activities comply with the Law,
- Makes the appropriate authorizations according to the nature of the data which is accessed within the company,
- Subjects the access to Sensitive Personal data to more stringent measures,
- Applies additional security checks to those persons who have access to Sensitive Personal Data,
- Takes commitments from the external service provider to ensure compliance with the Law in cases when Personal Data are subject to access from outside the Company for reasons such as use of outsourcing,
- Takes the necessary actions to inform all employees, particularly those who have access to Personal Data, about their duties and responsibilities within the scope of the Law.

## 7) Rights of Data Subjects

According to Article 11 of the Law, the Data Subjects have the following rights against the Data Controller:

- Know if their personal data has been processed or not, and request information in case their personal data has been processed.
- Find out the reason for processing of personal data and whether they have been used properly for that purpose.
- Know the third parties at home or abroad to whom personal data have been transferred.
- Request the correction of personal data that has been processed insufficiently or incorrectly.
- Request that the Personal Data are deleted or destroyed in accordance with the terms stipulated by the Laws, and request that the third parties to whom personal data have been transferred be notified of the actions taken.
- Object to any unfavorable result that they suffer due to analysis of processed data only by means of automatic systems.
- Demand indemnification of loss if they suffer loss due to their personal data being processed in breach of the law.

Paragraph 2, Article 28 of the Law lists the circumstances where data subjects are not entitled to make claims, and within this scope, the rights mentioned above shall not be used except the right to demand indemnification of damage to data in cases when:

- Personal Data processing is necessary for the prevention of crime or for a criminal investigation,
- Personal data that have been publicized by the Related Person him/herself have been processed,
- The processing of the personal data is necessary for the execution of inspection or regulation duties or disciplinary investigation or inquiry by the authorized and competent public authorities and entities, or professional institutions that are in the nature of a public institution based on the authorities granted to them by the laws,
- Personal Data processing is necessary for the protection of the economic and financial interests of the State regarding budget, tax and financial matters.

## 8) The Exercise of Rights by Data Subjects

You can to submit the application in one of the following ways in a manner to confirm that it is you who makes the application:

- Sending the copy of the application that bears the original signature through a notary public or registered mail to the address of Eczacıbaşı Gayrimenkul Geliştirme ve Yatırım A.Ş.,
- Signing the application with a secure electronic signature as per the Electronic Signature Law No. 5070 and sending it via e-mail to Eczacıbaşı Gayrimenkul Geliştirme ve Yatırım A.Ş. at its address [eczacibasigayrimenkul@hs02.kep.tr](mailto:eczacibasigayrimenkul@hs02.kep.tr),
- Using any other method which is prescribed by teh Personal Data Protection Board.



Our Company responds to data subjects who wish to exercise these rights within the limits set forth in the Law, within a maximum period of 30 days as required by the Law. In order for third parties to make an application on your behalf, you must have given a special power of attorney issued by a notary public to such third party.

Although, as a rule, your applications are processed free of charge, you may be charged at a fee rate in case such a rate has been set by the Personal Data Protection Board for these applications.

Our Company may request information from the Related Person in order to determine whether the applicant is a Data Subject, and may ask questions to the Data Subject in order to clarify the issues mentioned in the application.

### **9) Use of CCTV (Closed Circuit TV System)**

If you visit our Company's premises, your visual and audio data can be obtained through the closed circuit camera system and can be stored for the time required only for the purposes listed below. The purpose of using a closed circuit camera system is to prevent and monitor anti-social behaviors and criminal behaviors, to ensure security of the premises of our Company and the vehicles and equipment within the Company's premises, and to protect the health and safety of guests who visit the Company's premises. All technical and administrative measures required to ensure the security of your data obtained through the closed circuit camera system will be taken by our Company.

ANNEX-1

CONCEPTS	DEFINITIONS
<b>Explicit Consent</b>	Means an informed consent freely given by a Data Subject regarding a certain matter.
<b>Anonymization</b>	Means rendering personal data impossible to link with an identified or identifiable natural person, even through matching them with other data.
<b>Related Person / Data Subject</b>	Means the natural person, whose personal data is processed.
<b>Personal Data</b>	Means all the information relating to an identified or identifiable natural person.
<b>Sensitive Personal Data</b>	Means the data which, if disclosed or lost, may cause the Data Subject to suffer or be subject to discrimination, and which are subject to a more stringent protection regime under the Law.
<b>Processing of Personal Data</b>	Means any operation performed upon personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making retrievable, classification or preventing the use thereof, fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means.
<b>Data registry system</b>	Means the registry system in which the personal data is registered through being structured according to certain criteria.
<b>Data Controller</b>	Means a natural or legal person who determines the purposes and means of the processing of personal data, and who is responsible for establishment and management of the data registry system.
<b>Data Processor</b>	Means a natural person or legal entity that processes personal data on behalf of the data controller based on the authority vested by the latter.