

Personal Data Protection and Processing Policy of OneIngage

INFORMATION FORM ON THE PERSONAL DATA PROTECTION AND PROCESSING POLICY OF ONEINGAGE

Document Title:

Personal Data Protection and Processing Policy of OneIngage

The term “OneIngage” refers to and encompasses “OneIngage” refers to and encompasses OneIngage Pazarlama ve Teknoloji Çözümleri A.Ş., Intechno360 Pazarlama Teknolojileri A.Ş.,Ingage Dijital Pazarlama Hizmetleri A.Ş., OneIngage International Media Marketing ve Technology Solutions FZ-LLC and Digital Panorama Bilgi ve İletişim Teknolojileri Sistem ve Hizmetleri A.Ş

Target Audience:

All natural persons whose personal data are processed by OneIngage, excluding the employees of OneIngage

Prepared by:

Personal Data Protection Committee of OneIngage

Version:

1.0

Approved by:

Personal Data Protection Committee of OneIngage

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04.10.2022

In the event of any discrepancy between the Turkish version of this Policy and its translated versions, the Turkish text shall prevail.

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1. SECTION 1 - INTRODUCTION

1.1. INTRODUCTION

The protection of personal data is among the top priorities of OneIngage ("**OneIngage**" or the "**Company**"). Within the scope of this Personal Data Protection and Processing Policy of OneIngage (the "**Policy**"), the principles adopted by our Company in the conduct of personal data processing activities and the fundamental principles adopted to ensure compliance of such activities with the provisions of the Law on the Protection of Personal Data No. 6698 (the "**Law**") are set forth and thus, our Company aims to inform the data subjects and ensure the necessary transparency. With full awareness of our responsibility in this regard, your personal data are processed and protected within the scope of this Policy.

The processing and protection of our employees' personal data is managed under the Employee Personal Data Protection and Processing Policy of OneIngage, which has been prepared in parallel with the principles laid out in this Policy.

1.2. SCOPE

This Policy applies to all personal data of individuals, excluding our Company's employees, that are processed through automated means or by non-automated means provided that they form part of a data recording system. Detailed information regarding the relevant data subjects can be found in ANNEX 2 of this Policy ("*ANNEX 2 – Data Subjects*").

1.3. IMPLEMENTATION OF THE POLICY AND THE RELEVANT LEGISLATION

The relevant legal regulations in force concerning the processing and protection of personal data shall prevail in all cases. In the event of any conflict between the provisions of the applicable legislation and this Policy, our Company acknowledges that the provisions of the applicable legislation shall apply. This Policy sets forth the rules established by the relevant legislation in a concrete manner within the framework of the Company's practices.

1.4. ENTRY INTO FORCE OF THE POLICY

This Policy issued by our Company is dated 04.10.2022.

In the event that the Policy is revised in whole or in part, the effective date shall be updated accordingly. The Policy is published on our Company's website at https://oneingage.com/ and is made available to relevant data subjects upon request.

2. SECTION 2 – MATTERS RELATING TO THE PROTECTION OF PERSONAL DATA

2.1. ENSURING THE SECURITY OF PERSONAL DATA 4

In accordance with Article 12 of the Law, our Company takes the necessary measures, based on the nature of the data to be protected, to prevent the unlawful disclosure, access, transfer or other forms of security breaches concerning personal data. Within this scope, our Company takes administrative measures and carries out or commissions audits in line with the guidelines published by the Personal Data Protection Board ("**Board**") to ensure an appropriate level of security.

2.2. PROTECTION OF SENSITIVE PERSONAL DATA

Due to the risk that the unlawful processing of certain categories of personal data may cause harm or lead to discrimination, these types of data are granted special protection under the Law. According to Article 6 of the Law, "sensitive" personal data includes: data relating to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dress, membership in associations, foundations or trade unions, criminal convictions and security measures, as well as biometric and genetic data ("**Sensitive personal data other than health and sexual life**"); and data concerning health and sexual life ("**Sensitive personal data regarding health and sexual life**").

The technical and administrative measures taken by our Company to protect personal data are also implemented for sensitive personal data within the framework of the adequate safeguards set forth in the Board's Decision dated 31/01/2018 and numbered 2018/10, and as described in the Policy on the Processing and Security of Sensitive Personal Data, and the activities carried out in this regard are monitored and audited within the scope of internal audits conducted by our Company.

Detailed information regarding the processing of sensitive personal data is provided under Section 3.3 of this Policy.

3. INCREASING THE AWARENESS OF BUSINESS UNITS REGARDING THE PROTECTION AND PROCESSING OF PERSONAL DATA AND AUDITING ACTIVITIES

Our Company ensures that the necessary training sessions are organized for business units in order to raise awareness of preventing the unlawful processing of personal data, preventing unauthorized access to data, and ensuring the secure retention of data. These training and awareness activities organized by the Company are developed based on the "Personal Data Security Guidelines" published by the Board on the official website.

Through these training and awareness activities, our Company aims to ensure that personal data processing activities carried out by employees during the performance of their duties are conducted in compliance with the Law and secondary legislation.

Our Company establishes the necessary systems to ensure that both current and newly recruited employees are aware of the importance of personal data protection. Where necessary, the Company also works with external consultants on this matter. In this context, the Company monitors participation in training programs, seminars, and informational sessions and organizes new training sessions in line with updates in the relevant legislation.

4. SECTION 3 – MATTERS RELATING TO THE PROCESSING OF PERSONAL DATA

4.1. PROCESSING OF PERSONAL DATA IN COMPLIANCE WITH THE PRINCIPLES SET FORTH IN THE LEGISLATION

4.1.1. Processing in Compliance with Law and the Principle of Good Faith

Personal data are processed in accordance with the general principles of trust and good faith, without harming the fundamental rights and freedoms of individuals. Within this framework, personal data are processed to the extent required by and limited to the legitimate business activities of our Company.

4.1.2. Ensuring that Personal Data are Accurate and Up-To-Date When Necessary

Throughout the period during which personal data are processed, our Company takes the necessary measures to ensure their accuracy and updates them when necessary.

4.1.3. Processing for Specific, Explicit and Legitimate Purposes

Our Company clearly identifies the purposes for which personal data are processed and ensures that processing activities are conducted in line with these purposes and within the scope of its business operations.

4.1.4. Being Relevant, Limited and Proportionate to the Purposes for Which They Are Processed

Our Company collects personal data only to the extent necessary for the conduct of its business activities and processes them in a manner that is limited to and proportionate with the specified purposes.

4.1.5. Retention for a Period Prescribed by Relevant Legislation or for the Duration Required for the Purpose of Processing

Our Company retains personal data for the duration necessary to achieve the purpose for which they are processed and for the minimum period prescribed by the applicable legal regulations. In this context, our Company first determines whether the relevant legislation stipulates a retention period for personal data and, if such a period is specified, acts in accordance with it. If no legal retention period exists, personal data are retained for the period necessary for the purpose of processing. At the end of the designated retention periods, personal data are destroyed in accordance with periodic destruction schedules or upon the request of the relevant data subject, using the specified destruction methods (deletion and/or destruction and/or anonymization).

4.2. CONDITIONS FOR THE PROCESSING OF PERSONAL DATA

Apart from the explicit consent of the data subject, the conditions for the processing of personal data may consist of one or more of the circumstances listed below. In the case that the processed data constitute sensitive personal data, the conditions set forth in Section 3.3 ("Processing of Sensitive Personal Data") of this Policy shall apply.

(i) Explicit Consent of the Data Subject

One of the conditions for the processing of personal data is the explicit consent of the data subject. The explicit consent of the data subject must be given freely, based on informed knowledge, and related to a specific matter.

Personal data may be processed without the explicit consent of the data subject if one or more of the following conditions exist.

(ii) Explicit Provision in the Laws

Personal data of the data subject may be processed if there is an explicit provision for such processing stipulated in the legislation. In other words, this condition applies when the relevant law contains a clear provision permitting the processing of personal data.

(iii) Inability to Obtain the Explicit Consent of the Data Subject Due to Actual Impossibility

If the data subject is unable to express their consent due to actual impossibility or if their consent cannot be deemed valid, and the processing of their personal data is mandatory in order to protect the life or physical integrity of the data subject or another person, the personal data of the data subject may be processed.

(iv) Direct Relation to the Conclusion or Performance of a Contract

This condition shall be deemed fulfilled if the processing of personal data is necessary for the conclusion or performance of a contract to which the data subject is a party.

(v) Fulfillment of a Legal Obligation of the Company

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

(vi) Disclosure of Personal Data by the Data Subject

If the data subject has disclosed their personal data publicly, such personal data may be processed limitedly for the purpose of disclosure.

(vii) Processing is Necessary for the Establishment, Exercise or Protection of a Right

If processing is necessary for the establishment, exercise, or protection of a right, the personal data of the data subject may be processed.

(viii) Processing Necessary for the Legitimate Interests of Our Company

Provided that the fundamental rights and freedoms of the data subject are not violated, personal data of the data subject may be processed if it is necessary for the legitimate interests of our Company.

4.3. PROCESSING OF SENSITIVE PERSONAL DATA

Sensitive personal data are processed by our Company in accordance with the principles set forth in this Policy and the methods described in the Policy on the Processing and Security of Sensitive Personal Data, by taking administrative and technical measures and subject to the existence of the following conditions:

(i) **Sensitive personal data other than those related to health and sexual life** may be processed without the explicit consent of the data subject if such processing is explicitly permitted by law, i.e., if there is a clear provision in the relevant legislation regarding the processing of personal data. Otherwise, explicit consent of the data subject shall be obtained.

(ii) **Sensitive personal data relating to health and sexual life** may be processed without explicit consent of the data subject by persons bound by confidentiality obligations or authorized institutions and organizations for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning and management of health services and their financing. Otherwise, explicit consent of the data subject shall be obtained.

4.4. INFORMING THE DATA SUBJECT

In accordance with Article 10 of the Law and secondary legislation, our Company informs the data subject about who the data controller is, the purposes for which the personal data are processed, with whom and for what purposes the data are shared, the methods by which the data are collected, the legal basis for processing, and the rights of the data subject regarding the processing of their personal data.

4.5. TRANSFER OF PERSONAL DATA

Our Company may transfer the personal data and sensitive personal data of the data subject to third parties (including third-party companies, group companies, and third-party individuals) by taking necessary security measures in line with the legally permitted purposes of data processing. Our Company acts in compliance with the provisions set forth in Article 8 of the Law in this regard. Detailed information on this matter can be found in ANNEX 4 of this Policy (*"ANNEX 4 – Third Parties to Whom Personal Data Are Transferred by Our Company and the Purposes of Such Transfers*").

4.5.1. Transfer of Personal Data to Third Parties Located Within the Country

Even without the explicit consent of the data subject, personal data may be transferred to third parties by our Company with due care and by taking all necessary security measures, including those methods prescribed by the Board, provided that one or more of the following conditions for data processing ("**Processing Conditions**") exist.

- The relevant activities regarding the transfer of personal data are explicitly regulated by law,
- The transfer of personal data by the Company is directly related and necessary for the conclusion or performance of a contract,
- The transfer of personal data is mandatory for our Company to fulfill its legal obligations,
- The personal data have been made public by the data subject, and the transfer is limited to the purpose of disclosure,
- The transfer of personal data by the Company is necessary for the establishment, exercise, or protection of the rights of the Company, the data subject, or third parties,
- Provided that the fundamental rights and freedoms of the data subject are not violated, the transfer of personal data is necessary for the legitimate interests of the Company,
- The data subject is unable to express their consent due to actual impossibility or their consent cannot be deemed legally valid, and the processing is mandatory to protect the life or physical integrity of the data subject or another person.

4.5.2. Transfer of Personal Data to Third Parties Located Abroad

The transfer of personal data abroad by our Company is carried out in accordance with whether the recipient country is among the countries with adequate protection as determined and announced by the Board.

If the recipient country **is not** among the countries announced by the Board as having adequate protection, personal data may be transferred to third parties located abroad, provided that at least one of the Processing Conditions exists and the fundamental principles set forth under Article 4 of the Law are observed, in the following cases.

- If the explicit consent of the data subject has been obtained,
- If both the Company and the data recipient in the relevant foreign country provide a written undertaking of adequate protection and the Board grants permission for the transfer

If the recipient country **is** among the countries announced by the Board as having adequate protection, personal data may be transferred abroad based on the existence of any of the Processing Conditions.

4.5.3. Transfer of Sensitive Personal Data

Sensitive personal data may be transferred by our Company in accordance with the principles set forth in this Policy and the methods described in the Policy on the Processing and Security of Sensitive Personal Data, **by taking all necessary administrative nd subject to the existence of the following conditions:**

(i) **Sensitive personal data other than those related to health and sexual life** may be processed without the explicit consent of the data subject if such processing is explicitly permitted by law, i.e., if there is a clear provision in the relevant legislation regarding the processing of personal data. Otherwise, explicit consent of the data subject shall be obtained.

(ii) **Sensitive personal data relating to health and sexual life** may be processed without explicit consent of the data subject by persons bound by confidentiality obligations or authorized

institutions and organizations for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning and management of health services and their financing. Otherwise, explicit consent of the data subject shall be obtained.

5. SECTION 4 – CATEGORIZATION OF PERSONAL DATA PROCESSED BY OUR COMPANY AND PURPOSES OF PROCESSING

Within our Company, personal data are processed in compliance with the general principles set forth in Article 4 of the Law, primarily the principles related to the processing of personal data, and based on at least one of the Conditions for Processing, and in a limited manner solely for the purposes arising in connection with our Company's business activities. Detailed information regarding these purposes of personal data processing can be found in ANNEX 1 of this Policy ("*ANNEX 1 – Purposes of Personal Data Processing*").

Detailed information on the categories of personal data processed in connection with our business activities, along with further details on each category, is available in ANNEX 3 of this Policy ("*ANNEX 3 – Categories of Personal Data*").

6. SECTION 5 – RETENTION AND DESTRUCTION OF PERSONAL DATA

Our Company retains personal data for the duration necessary to achieve the purpose for which they are processed and for the minimum period prescribed by the applicable legal regulations. In this context, our Company first determines whether the relevant legislation stipulates a retention period for personal data and, if such a period is specified, acts in accordance with it. If no legal retention period exists, personal data are retained for the period necessary for the purpose of processing.
The personal data processed by our Company are classified into categories, and for each category, maximum data retention periods are determined in line with the relevant data processing activities. These retention periods are set forth in the table included in our Company's Personal Data Retention and Destruction Policy. At the end of the designated retention periods, personal data are destroyed in accordance with periodic destruction schedules or upon the request of the relevant data subject, using the specified destruction methods (deletion and/or destruction and/or anonymization).

7. SECTION 6 – RIGHTS OF THE DATA SUBJECT AND EXERCISING THESE RIGHTS

7.1. RIGHTS OF THE DATA SUBJECT

As personal data owners, data subjects have the following rights:

(1) To learn whether personal data are being processed,
(2) If personal data have been processed, to request information regarding such processing,
(3) To learn the purpose of the processing of personal data and whether they are used in accordance with that purpose,
(4) To know the third parties, either domestic or abroad, to whom personal data have been transferred,
(5) To request the rectification of personal data if they are incomplete or inaccurate, and to request that such rectification be notified to third parties to whom the data have been transferred,
(6) To request the deletion or destruction of personal data if the reasons requiring their processing no longer exist, even if they have been processed in accordance with the Law and other relevant legislation, and to request that such deletion or destruction be notified to third parties to whom the data have been transferred,
(7) To object to the occurrence of a result against the data subject by analyzing the processed data exclusively through automated systems,
(8) To request compensation for damages arising from the unlawful processing of personal data.

7.2. EXERCISING THE RIGHTS OF THE DATA SUBJECT
Data subjects may submit their requests regarding the rights listed in Section 6.1 ("*Rights of the Data Subject"*) to our Company by the methods determined by the Board. In this regard, they may use the "Data Subject Application Form" available at [●].

7.3. RESPONDING TO APPLICATIONS BY OUR COMPANY
Our Company takes the necessary administrative and technical measures to ensure that the applications submitted by data subjects are concluded in accordance with the Law and secondary legislation.

If a data subject submits a request regarding the rights listed in Section 6.1 ("*Rights of the Data Subject*") in accordance with the applicable procedure, our Company shall conclude the request free of charge as soon as possible and within no later than 30 (thirty) days, depending on the nature of the request. However, if the process requires an additional cost, a fee may be charged in accordance with the tariff determined by the Board.

ANNEX 1 – Purposes of Personal Data Processing

MAIN PURPOSES (PRIMARY)	SUB-PURPOSES (SECONDARY)
Carrying out the necessary work by our business units and executing the relevant business processes to enable data subjects to benefit from the products and services offered by the Company	Planning and execution of product and service sales processes
	Planning and/or execution of post-sales support service activities
	Follow-up of contract processes and/or legal claims
	Planning and execution of customer relationship management processes
	Tracking customer requests and complaints
Carrying out the necessary work by our relevant business units and executing the associated business processes for the conduct of the Company's commercial activities	Planning and execution of supply chain management processes
	Planning of information security processes
	Follow-up of finance and/or accounting activities
	Planning and execution of business activities
	Planning and execution of corporate communication activities
	Establishment and management of information technology infrastructure
	Planning and execution of business continuity activities
Planning and execution of the Company's human resources policies and processes	Execution of personnel recruitment processes
	Monitoring and/or supervision of employees' work activities
Ensuring the legal, technical, and commercial/operational security of the Company and the relevant persons who are in a business relationship with the Company	Ensuring the security of the Company's premises and/or facilities
	Ensuring the security of the Company's operations

Planning and execution of activities necessary for recommending and promoting the products and services offered by the Company to relevant persons by customizing them according to their preferences, usage habits, and needs	Planning and execution of marketing processes for products and/or services

ANNEX 2 – Data Subjects

PERSONAL DATA OWNER CATEGORIES	DESCRIPTION
Customer	Real persons who currently use or have used the products and services offered by our Company, regardless of whether they have a contractual relationship with the Company
Corporate Customer	Employees or authorized representatives of legal entities that currently use or have used the products and services offered by our Company, regardless of whether they have a contractual relationship with the Company
Supplier Employee / Representative	Real persons who are employees, authorized representatives, or shareholders of parties providing services to our Company on a contractual basis and in line with our Company's instructions and directions, during the conduct of our commercial activities
Visitor	Real persons who have entered the physical premises owned by our Company for various purposes or who visit our websites
Business Partner Employee / Representative	Real persons working at institutions with which our Company has any form of business relationship, including shareholders and authorized representatives of such institutions
Employee Candidate	Real persons (including internship candidates) who have applied for a job at our Company by any means or have made their resumes and related information available for our Company’s review
Company Representative	Real persons who are members of the Board of Directors or other authorized representatives of our Company

ANNEX 3 – Categories of Personal Data

CATEGORIES OF PERSONAL DATA	DESCRIPTION
Identity Information	Personal data containing information about an individual's identity, such as: name and surname, Turkish ID number, nationality information, place of birth, date of birth, gender, workplace information, registry number, tax number, title, biography, etc., as well as documents such as driver's license, professional ID, identity card, and passport
Contact Information	Phone number, address, e-mail address, and fax number
Physical Space Security Information	Personal data relating to records and documents obtained during entry to or presence within the Company's physical premises; including camera recordings and records collected at security checkpoints
Transaction Security Information	Personal data processed to ensure the technical, administrative, legal, and commercial security of our Company during the execution of commercial activities (e.g., log records)
Financial Information	Personal data processed in relation to any type of financial outcome generated based on the legal relationship established between our Company and the data subject, including bank account number, IBAN number, debt/credit information, and income details
Employee Candidate Information	All personal data processed for the purpose of evaluating individuals who have applied to become an employee of our Company or who are considered as candidates due to the Company's human resources needs in accordance with commercial custom and good faith principles (including data used for recruitment processes such as military status, educational background, marital status, and reference information).
Sensitive Personal Data	Data regarding individuals' race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and clothing, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data
Visual and Audio Data	Photographs, video recordings, and audio recordings
Audit and Inspection Information	Personal data processed during internal or external audit activities conducted within the scope of our Company's legal obligations and compliance with corporate policies.
Legal Transaction and Compliance Information	Personal data processed for the purposes of determining and pursuing our Company's legal receivables and rights, fulfilling our debts, complying with legal obligations, and ensuring adherence to the Company's internal policies
Transaction Information	Personal data obtained by our Company within the scope of its business activities, including survey responses, cookie records, entry–exit logs, and personality inventory data

ANNEX 4 – Third Parties to Whom Personal Data Are Transferred by Our Company and the Purposes of Such Transfers

Our Company may transfer customers' personal data to the following categories of recipients in accordance with Articles 8 and 9 of the Law:

(i) Business / Solution Partners
(ii) Suppliers
(iii) Koç Holding A.Ş.
(iv) Koç Group Companies
(v) Legally Authorized Private Legal Entities
(vi) Legally Authorized Public Institutions and Organizations
(vii) Shareholders

The scope of the above mentioned persons and the data transfer purposes are specified below.

Recipients of Data Transfer	Definition	Purpose of Data Transfer
Business / Solution Partner	Parties that determine the purposes and means of personal data processing independently within the scope of our Company's commercial activities and provide services to our Company accordingly	Limited to ensuring the fulfillment of the purposes for establishing the business partnership
Supplier	Parties providing services to our Company within the scope of our Company's commercial activities in accordance with our data processing purposes and instructions	Limited to ensuring the provision of outsourced services obtained from the supplier necessary for carrying out our Company's commercial activities
Legally Authorized Public Institutions and Organizations	Public institutions and organizations authorized by relevant legislation to receive information and documents from our Company, e.g., Ministries, Tax Offices, Trade Registry	Limited to the purpose requested within the legal authority of the relevant public institutions and organizations
Legally Authorized Private Legal Entities	Institutions or organizations established in accordance with certain legal conditions stipulated by relevant legislation and operating within the framework defined by the law (e.g., independent auditors, notaries).	Personal data are shared in a limited manner concerning matters related to the activities conducted by these private institutions and organizations.
Koç Holding A.Ş.	Koç Holding A.Ş.	Limited to ensuring the execution of corporate communication, strategic planning, commercial, and audit activities requiring the participation of Koç Group Companies.

Koç Group Companies	*(The list of Koç Group Companies can be accessed at www.koc.com.tr)*	Limited to evaluation purposes during recruitment processes in other Koç Group Companies, provided the explicit consent of the relevant person is obtained
Shareholder	Our shareholders who are authorized under relevant legislation to design the strategies and oversee the audit activities related to the Company's commercial operations	Limited to the design of strategies related to the Company's commercial activities and for audit purposes in accordance with the relevant legislation.