

CLARIFICATION TEXT ON THE PROTECTION OF PERSONAL DATA

Pursuant to the General Data Protection Regulation (“GDPR”), which aims to protect fundamental rights and freedoms of individuals, and particularly the right to privacy, when processing personal data, this Clarification Text was issued. AssisTT Rehberlik ve Müşteri Hizmetleri AŞ. and AssisTT Holland BV (collectively “AssisTT”), as each being individual data controllers, take necessary technical and administrative measures in accordance with GDPR by using its technological and infrastructure capabilities in order to ensure that personal data is kept securely and processed in accordance with the law.

Personal data is processed by AssisTT in accordance with GDPR under this Clarification Text. Natural persons, whose personal data are processed within the scope of GDPR, can learn about the personal data that can be processed by AssisTT, purposes of processing these data, recipient groups to which it can be transferred, the method of collection and the legal reason for data processing, and their rights under GDPR regarding these personal data by reviewing the text below.

1. PROCESSED PERSONAL DATA

Personal Data means any and all information relating to an identified or identifiable natural person. The following personal data may differ from person to person within the framework of the requests of the concerned people and/or the products/services they use, and your personal data that can be processed by AssisTT are as follows:

ID Information: Name, last name, date and place of birth, sex, nationality, maiden name, marital status, photograph, a copy of the ID card/passport

Contact Information: Phone number, e-mail address, residency address

Usage Information: Traffic information, behavior and trend information on AssisTT websites, and cookies

Transaction Security Details: Password, security question and certificate information used to authenticate the user ID

Visual and Audio Recordings: Audio and/or video call recording information in the call center and offices

2. PURPOSES OF PROCESSING PERSONAL DATA

Your personal data may be processed for following purposes in accordance with the processing conditions set out in the GDPR articles and secondary regulations:

- Preparing, providing, promoting, monitoring, and reporting product and services campaigns and offers according to our customers’ usage, and informing about the campaign content,
- Informing our customers about new products/services, campaigns/tariffs, and other innovations, information and customer recovery activities, creating sales opportunities,

- Compliance with the information storage, reporting and information obligations stipulated by the legislation and official authorities within the scope of the national and international principles regarding the recognition of customers,
- Developing products, services and works in traditional and digital channels within the scope of network and technological advances/improvements for a better and innovative service delivery,
- Establishing brand collaborations with brands that touch different sectors within the scope of increasing the diversity of products and services, and allowing customers to benefit from various opportunities,
- Sharing information/documents requested by regulatory and supervisory institutions and official authorities, fulfilling legal obligations in the relevant legislation, and conducting auditing activities, legal pursuits and legal processes.

3. PLACE WHERE PERSONAL DATA WILL BE PROCESSED

Your personal data will be processed in the European Union countries where it is obtained to the extent necessary within the scope of the service provided (GDPR Article 49, Paragraph 1b), or as prescribed by law (GDPR Article 6, Paragraph 1c), and will be stored in the European Union countries and Turkey.

4. TRANSFER OF PERSONAL DATA

Your personal data may be transferred at home or abroad for the purposes listed below and through our data processors within the scope of GDPR:

- If you give your explicit consent, your subscription, location and usage data may be shared with Türk Telekomünikasyon A.Ş., TT Mobil İletişim Hizmetleri A.Ş., TTNET A.Ş., TT Ödeme Hizmetleri A.Ş., and TT Finansman A.Ş. for the purpose of providing you with suitable offers within the scope of the services of our Group companies. (GDPR Article 49, Paragraph 1a).
- For the purpose of meeting the demands of regulatory and supervisory institutions, regulatory and supervisory institutions, and competent authorities which can detect your location in case of emergency calls may share your personal data with the public institutions or organizations which are authorized to explicitly request information as per the law that they are subject to.
- In order to carry out your financial transactions and ensure the security of your mobile finance transactions, your subscription, financial and device information may be shared with payment and e-money organizations, and banks.
- In order to carry out legal proceedings, your necessary personal data may be shared with law offices, courts, and consumer arbitration committees.
- TTNET will remain to be responsible for the protection of your data during the data processing carried out by our data processors assigned within the scope of GDPR Article 28. We assign our data processors particularly in the areas below: IT, sales, marketing, consulting, customer services.

5. METHODS OF COLLECTING PERSONAL DATA AND THE LEGAL REASONS

Your personal data might be obtained and processed via our website, call center and mobile applications.

When establishing your legal relationship with AssisTT, or during the continuance of the relationship in question, your personal information is collected:

- through written, verbal and electronic mediums
- for the purposes mentioned above, and
- fully/partially and automatically or otherwise. Your personal data is processed for the following legal reasons:
 - You have given your express consent,
 - It is expressly stipulated especially in GDPR and
 - the Electronic Communications Law no. 5809, and other legislation to which our Company is subject,
 - Regulation on the Processing of Personal Data and Protection of Confidentiality in the Electronic Communications Industry,
 - Regulation on Consumer Rights Regarding the Electronic Communications Sector
 - Law no. 4054 on the Protection of Competition
 - Law no. 6563 on the Regulation of Electronic Trade
 - Regulation on Commercial Communication and Commercial Electronic Messages
 - Law no. 6502 on the Protection of Consumers
 - Turkish Code of Obligations no. 6098
 - Turkish Code of Commerce no. 6102
 - Labor Law no. 4857
 - Public Procurement Law no. 4734
 - Law on Occupational Health and Safety no. 6331
 - The requirement for processing of the personal data of the parties to an agreement provided that it is directly relevant to establishment and fulfillment of the agreement, to be able to supply the products and services demanded and to fulfill the requirements of the agreements we concluded,

- It is compulsory to fulfill our legal obligations,
- It has already been made public by the concerned person him/herself,
- It is necessary to process data to establish, use or protect a right,
- It is necessary to process data for the legitimate interests of our Group Companies without prejudice to the fundamental rights and freedoms of the concerned person.

6. PROCESSING PERSONAL DATA OF CHILDREN

AssisTT is committed to the regulations on protection of children within the scope of national and international legal requirements.

7. YOUR RIGHTS REGARDING THE PROTECTION OF YOUR PERSONAL DATA

- Requesting information about the categories of the processed data, processing purposes, possible recipients of the data, and the planned storage period (GDPR Article 15),
- Requesting correction or addition of inaccurate or incomplete data (GDPR Article 16),
- Cancelling the given permission at any time in a way to be applicable in the future (GDPR Article 7, Paragraph 3),
- Objecting the data processing to be carried out on the basis of legitimate interest for reasons arising from your special situation (GDPR Article 21, Paragraph 1)
- Within the scope of GDPR Article 17, requesting the deletion of the data - particularly if the data are not required for the intended purpose anymore, are processed illegally, or in cases where your permission was cancelled,
- In cases where deletion is not possible or there is an objection to the obligation of deletion, requesting the limitation of data under certain circumstances (GDPR Article 18),
- About the data portability, requesting the receipt and transmission to others of the data you provide to us in a readable format (GDPR Article 20),
- Complaining to the responsible supervisory authority regarding data processing,
- To know third parties to whom your personal data are transferred internally and abroad,
- To request compensation for damages in the event that you incur damages as a result of unlawful processing of your personal data.

If you would like to exercise your rights mentioned above, you can submit your application to our e-mail/REM addresses given below

- electronic signature, or a mobile signature registered with our systems as per the conditions stated in the
- Communiqué on Terms and Procedures for Application to Data Controller (“Communiqué”) in order for us to determine if the application belongs to you and thus, protect your rights.

The applications to be made in this scope shall be accepted following to an identity authentication carried out by us and your request shall be concluded as soon as possible and the latest within 30 days according to the nature of the request.

8. OUR COMMUNICATION CHANNELS

AssisTT Rehberlik ve Müşteri Hizmetleri A.Ş. Turkey Notary Public / By Post: Kocayol Cad. Kerembey Sok. No: 2/1 Kadıköy/İstanbul REM: assistt@hs02.kep.tr	AssisTT Holland BV (AssisTT Holland) Address: Kingsfordweg 151, 1043GR Amsterdam E-mail:
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