

## Zorlu Gayrimenkul Geliştirme ve Yatırım A.Ş.

### Disclosure on the Processing of Personal Data

As Zorlu Gayrimenkul Geliştirme ve Yatırım A.Ş. (“**Corporation**”), we pay utmost attention to the protection and security of your personal data. In this context, we, as the Data Controller, would like to enlighten and inform you in the most transparent way about the methods of collecting your personal data, the purposes and legal reasons for the processing thereof, and your rights available under the Personal Data Protection Law No. 6698 (“**Law**”), which is designed to protect the fundamental rights and freedoms of individuals, especially the privacy of private life, and to protect personal data.

#### PURPOSES AND LEGAL REASONS OF PROCESSING PERSONAL DATA

Your personal data is processed in accordance with the purposes specified in the table below, in accordance with the legal reasons specified in Articles 5 and 6 of the Law.

PERSONAL DATA PROCESSED	PURPOSE	LEGAL REASON
<b>Identity Details</b> (e.g. Name, surname) <b>Contact Details</b> (e.g. E-mail, mobile phone number)	<ul style="list-style-type: none"><li>– Execution of Goods / Service Sales Processes</li><li>– Follow-up of Requests / Complaints</li><li>– Execution of Customer Relationship Management Processes</li><li>– Execution of Goods / Services After Sales Support Services</li><li>– Execution of Communication Activities</li><li>– Execution / Supervision of Business Activities</li><li>– Execution of Strategic Planning Activities</li></ul>	Provided that it is directly related to the execution or performance of a contract, it is necessary to process the personal data of the parties to the contract.
<b>Identity Details</b> (e.g. Name, surname) <b>Contact Details</b> (e.g. E-mail, mobile phone number) <b>Transaction Security Details</b> (IP address information, Website log in and log out details)	<ul style="list-style-type: none"><li>– Providing Information to Authorized Persons, Institutions and Organizations</li><li>– Execution of Information Security Processes</li><li>– Execution of Activities in Compliance with the Legislation</li><li>– Follow-up and Execution of Legal Affairs</li></ul>	It is obligatory for the data controller to fulfill its legal obligation

#### METHOD OF COLLECTING PERSONAL DATA

Your personal data may vary depending on the service, product or commercial activity provided by our Company; it can be collected verbally, in writing or electronically from you through automated or non-automated methods, call center, website, mobile applications.

#### RETENTION PERIOD OF PERSONAL DATA

Our company will keep your personal data for as long as required by the above-mentioned processing purposes. In addition, in case of any dispute that may arise, our Company may store your personal data for the duration of the statute of limitations specified in the relevant legislation, for the purpose of making the necessary defenses in connection with the dispute.

#### PARTIES TO WHICH PERSONAL DATA IS TRANSFERRED, AND PURPOSES OF TRANSFER

Your personal data may be shared with authorized public institutions and organizations in the event of a legal dispute in accordance with Articles 8 and 9 of the Law for the purposes contained in the first article of the Disclosure Text regarding the Processing of This Personal Data.

#### **MEASURES AND COMMITMENTS REGARDING DATA SECURITY**

Our Corporation hereby undertakes to ensure that

- personal data is not processed unlawfully,
- personal data is not accessed unlawfully, and
- necessary technical and administrative measures shall be taken to ensure the appropriate level of security and to carry out the necessary inspections in order to ensure the protection of personal data.

Our corporation will not disclose any personal data obtained about you to others in violation of the Disclosure on the Processing of Personal Data and the provisions of the Law on the Protection of Personal Data and the relevant legislation, and will not use it for any purposes other than for the purposes for which it is processed.

In case of presence of any links to other applications on our website, our Corporation does not bear any responsibility for the privacy policies and contents of such applications.

#### **YOUR RIGHTS REGARDING THE PROTECTION OF PERSONAL DATA**

In accordance with Article 11 of the Law, regarding your Personal Data, you are entitled to

- learn whether your personal data are being processed
- request information if your personal data is processed;
- obtain information on the purpose of processing and find out whether personal data has been used as fit for the purpose
- obtain information about the third persons in Turkey and abroad, to whom personal data are transferred,
- request rectification of personal data that may have been incompletely or inaccurately processed, to request the notification of the transaction made within this scope to the third parties to whom your personal data has been transferred,
- request the deletion or destruction of personal data in the event that the reasons requiring its processing cease to exist, even though it has been processed in accordance with the provisions of the law and other relevant laws, and to request the notification of the transaction made within this scope to the third parties to whom the personal data has been transferred,
- object to occurrence of any detrimental result by means of analysis of personal data exclusively through automated systems
- request compensation for the damages due to unlawful processing of personal data.

As the Data Owner, you may send your claims regarding the said rights to the address "**Zorlu Gayrimenkul Geliştirme ve Yatırım A.Ş. Levent 199, Büyükdere Caddesi No: 199 K:3 Levent-Şişli-İstanbul**" in writing, or to the registered electronic mail (KEP) '[zorlugayrimenkul@hs03.kep.tr](mailto:zorlugayrimenkul@hs03.kep.tr)', or to the address "[zorlugayrimenkul@zorlu.com](mailto:zorlugayrimenkul@zorlu.com)" via secure electronic signature, mobile signature or, if available, the e-mail address you have previously notified to our Company and registered in our Company's systems. Your claims shall be evaluated and finalized within 30 (thirty) days upon receipt thereof. Any requests submitted by you as the Data Owner must contain your name, surname, signature if the application is written, your Turkish identity number, or nationality if you are a foreigner, your passport number or identity number, if any, your place of residence or work address for notification, your e-mail address, if any, your telephone and fax numbers, and the subject of the

request. In case a written response is given to a request, no fee will be charged for up to ten pages, and our Corporation hereby reserves the right to charge a fee for responses over ten (10) pages, based on the fee schedule stipulated by the legislation. If the response to a request is given in a recording medium such as a CD or flash memory, our Corporation may charge you a fee equal to the cost of the recording medium.

#### **CHANGES IN THE WORDING**

Our corporation may change the provisions available in this disclosure at any time by publishing such changes. The provisions amended by our Corporation shall become effective on the date of publication thereof.

***Last Updated on: 08.03.2022***

[APPLICATION FORM FOR PROTECTION OF PERSONAL DATA](#)