

GENERAL POLICY ON PERSONAL DATA PROTECTION AND PROCESSING

1. INTRODUCTION

1.1. Introduction

Personal data protection has a great importance in terms of Invent Yazılım Danışmanlık A.Ş. (“INVENT” or the “COMPANY”) and finds place in company priorities. Within this scope, INVENT pays utmost attention to protect personal data of it’s insured employees, job applicants, authorities, visitors, commercial relation parties (institutions, employees, authorities) and third parties, whose data is somehow processed by the COMPANY.

INVENT takes the administrative and technical precautions, which are needed to protect personal data, processed in accordance with legislation. In this Policy, INVENT’s following principles about personal data processing will be explained in detail.

- Processing personal data in compliance with law and good faith,
- Providing the reliability and actuality of personal data,
- Processing personal data for specific, legitimate and explicit purposes,
- Processing personal data related, limited and proportional to the processing purpose,
- Preserving personal data in accordance with the processing purpose and the duration stated in legislation,
- Clarifying and informing personal data owners,
- Providing the system, required for data owners to exercise their rights,
- Taking the measures, necessary for the security of personal data,
- Complying with the regulations of Personal Data Protection Council (the “Council”) and legislations, in the matter of transferring personal data to third parties in accordance with the processing purpose,
- Showing sensitivity, required for processing and protecting sensitive personal data.

1.2. Policy Purpose

The main purpose of this Policy is to elucidate the lawful processing of personal data and the systems, internalized by the COMPANY to protect processed data. Within this scope, we aim to provide a transparent processing procedure, by informing the subjects of data processing, particularly our employees, job applicants, authorities, visitors, commercial relation parties (institutions, employees, authorities) and third parties, whose data is somehow processed by the COMPANY.

1.3. Scope

This Policy pertains to all personal data of INVENT’s insured employees, job applicants, authorities, visitors, commercial relation parties (institutions, employees, authorities) and third parties, whose data is somehow processed within INVENT, by an automatic data recording system or a non-automatic one, under the condition that must be a part of an automatic data recording system,

1.4. Enforcement of the Policy

This Policy is drawn up by INVENT and has entered into force resolution of board of directors. The Policy is published on INVENT’s Website and allowed to access of concerned persons on data owners’ demand.

2. PERSONAL DATA PROTECTION RELATED MATTERS

2.1. Ensuring the Security of Personal Data

INVENT, in compliance with Art 12 of Personal Data Protection Law No.6698, takes the necessary administrative and technical measures and also ensures, that the inspections are made in order to safely store the data, prevent unlawful data process and/or avoid illegal access to these data.

2.1.1. Technical and Administrative Measure Taken to Ensure Lawful Processing of Personal Data, Prevent Unlawful Access to Personal Data and Provide Personal Data Retention

INVENT, within the bounds of technological possibilities, Council’s guide and current developments, takes all measures, which are necessary to ensure the lawful processing of personal data, prevent

unauthorized, improvident or in any other way unlawful declaration and access, store safely and avoid illegal destruction or transformation.

Technical measures taken within this scope are as follows;

- To ensure the network and application security,
- Closed system network is used to transfer data through a network path,
- Key method is used,
- Authorization matrix for employees is formed,
- Security measures are taken, in the scope of supply, development and maintenance of information technologies system,
- Access logs are kept regularly,
- Mission based authorization of employees, who change position or quit the job, are taken back,
- Updated anti-virus system are used,
- Security walls are used,
- Security of personal data is followed up,
- Necessary security measures for entries and exist to personal data involving physical medium are taken,
- Personal data involving media are secured,
- Backups for personal data are made and secured,
- User account management and authorization controlling system are used and followed up,
- Log records are kept free from user intervention,
- Current risks and threats are determined,
- Attack detection and prevention systems are used,
- Penetration tests are run,
- Cyber security measures are taken and followed up continuously,
- Encryption is set,
- Software, preventing data loss, are installed,

Administrative measures taken within this scope are as follows;

- Key management is set,
- Security measures are taken, in the scope of supply, development and maintenance of information technologies system,
- There are disciplinary regulations, involving data security provisions for employees,
- Data security and awareness themed periodical trainings for employees are arranged,
- Authorization matrix for employees is formed,
- Corporate policies are created and started to be executed in fields of access, information security, retention and destruction,
- Confidentiality agreements are made,
- Mission based authorization of employees, who change position or quit the job, are taken back,
- Concluded agreements involve data security provisions,
- Additional security measures are taken for personal data, that are transferred through paper and the concerned paper is sent in classified document format,
- Personal data security policies and procedures are determined,
- Personal data security issues are reported swiftly,
- Personal data security is followed up continuously,
- Necessary security measures for entries and exist to personal data involving physical medium are taken,
- Personal data involving physical media are secured against external risks (fire, flood, etc.),
- Personal data involving media are secured,
- Personal data are minimized as far as possible,
- Periodical/random in-house inspections are conducted,
- Current risks and threats are determined,
- Policies and procedures for the security of sensitive personal data are specified and executed,
- Data processing service providers are periodically inspected in the matter of data security,
- Awareness of data processing service providers in the matter of data security must be raised,

2.1.2. Controlling the Measures Relating to Personal Data Protection

The COMPANY conducts all necessary inspections, in accordance with Art. 12 of the Personal Data Protection Law. Results of these inspections are reported to concerning managers and departments, and necessary improving activities for taken measures are carried out.

2.1.3. Measures to Take, in the Event of Unlawful Data Disclosure

INVENT runs the in-house mechanism, that enables to notify the personal data owner and Personal Data Protection Council within the shortest time possible, in the event of unlawful access to personal data, which are legally processed in compliance with Art. 12 of the Personal Data Protection Law. If it is necessary for Personal Data Protection Council, this situation may be also be published on Council's Website or via another method.

2.2. Ensuring Data Owners' Rights, Providing Request Methods for Data Owners and Assessing These Requests

INVENT manages the internal functioning, channels and administrative and technical regulations, which are necessary to assess data owners' rights and notify data owners in compliance with Art 13 of the Personal Data Protection Law. If the data owners send requests concerning their below mentioned rights, depending on their qualification, they will be responded free of charge within 30 days from the arrival to INVENT. However, if the Personal Data Protection Council specifies an amount to pay, it will be taken from the data owner.

Personal data owners have right to;

- to learn whether the personal data related to you are/have being processed,
- if it is processed, to request information with regard to processing,
- to learn purposes of the processing and whether your personal data has been used for the intended purpose
- to know the third parties within or outside the country to whom the personal data are transferred,
- to request correction of the personal data if the data is processed incompletely or inaccurately,
- to request deletion or destruction of the personal data under the conditions set forth in Article 7 of the Law No. 6698 on Personal Data Protection,
- to request notifying third persons to whom the personal data are transferred, about the processes completed within the scope of Art 11/d-e of the Law,
- to object to negative consequences about you that are concluded as a result of analysis of the processed personal data exclusively by automatic means,
- to claim indemnification if the event that you suffered damage due to illegal processing of your personal data.

2.3. Protecting Sensitive Personal Data

Personal Data Protection Law gives a particular importance to certain type of personal data by the reason that their violation may cause to aggrievement and discrimination. Mentioned data types, as specified in Art 6 of the Personal Data Protection Law are data, concerning; ethnicity, race, political opinion, philosophical belief, religion, communion or other beliefs, dress, membership of associations, foundations or unions, health, sexual life, penalty conviction, security measures, biometric and genetic.

INVENT pays attention to lawful processing and protection of above mentioned "sensitive" personal data. Within this scope, INVENT's in-house inspections and all technical and administrative measures, taken for personal data protection, are executed meticulously also for sensitive personal data.

2.4. Increasing and Controlling Company Departments' Awareness of Personal Data Protection and Processing

INVENT provides department trainings, that are necessary to prevent unlawful processing of personal data, avoid illegal access to personal data and raise the awareness about data retention. Within this scope, systems, required to create the personal data protection awareness for company employees or incoming employees are formed.

The results of INVENT's trainings to raise the awareness for personal data protection and processing are reported to COMPANY authorities. Accordingly, the COMPANY assesses the participation to these trainings, seminars and informing sittings, and conducts necessary inspections. In addition to this, INVENT updates and renews the trainings, in accordance with the update of personal data protection legislation and resolutions taken by Personal Data Protection Council.

3. PERSONAL DATA PROCESSING RELATED MATTERS

3.1. Processing Personal Data in Accordance with the Principles Stated by Legislation

3.1.1. Processing in compliance with law and good Faith

INVENT acts in compliance with the principles of legal regulations, general trust and good faith during the process of personal data. Within this scope, the COMPANY pays attention to proportionality and limitedness of data processing and does not use personal data out of their purpose.

3.1.2. Providing the Reliability and Actuality of Personal Data

INVENT ensures the actuality and accuracy of data, that are processed considering fundamental rights of data owners and its own legitimate interests. It takes required precautions accordingly. Within this scope, personal data owners may apply to the COMPANY any time they desire, in order to correct or confirm the accuracy of data. These applications are assessed by authorized departments of INVENT and if the application is approved, requested deletion or confirmation is carried out.

3.1.3. Processing Personal Data for Specific, Legitimate and Explicit Purposes

INVENT explicitly and precisely specifies the legitimate and lawful purpose of personal data processing. Within this scope, the COMPANY processes the amount of data, that are necessary only for operating and commercial activities. The processing purpose is specified by the COMPANY before the process takes place.

3.1.4. Correlativity, limitedness and Proportionality with the Processing Purpose

INVENT processes the data in a manner, that is eligible for realizing the purpose and avoids processing data, which are irrelevant to purpose. Within this scope, personal data are not processed to meet probable future needs.

3.1.5. Preserving data, in accordance with the processing purpose and the duration stated in legislation

INVENT preserves personal data only for the time specified in related legislation or the time required to serve the purpose. In this context, the COMPANY first determines if any retention period for personal data is specified via legislation and follows this time limitation, if there is no time specified here, preserves the data in compliance with the purpose. In the event that, the specified period ends, or the processing purpose disappears, personal data are deleted, destructed or anonymized by the COMPANY.

3.2. Clarification of Data Owner

In accordance with Art. 10 of Personal Data Protection Law, INVENT clarifies personal data owners during personal data acquiring. Within this scope, INVENT clarifies the following issues; purpose of personal data processing, to whom or for what purpose may the data be transferred, personal data acquiring method, legal reason and the rights of the data owner.

Under the head of Art. 20 of the Constitution, everyone has the right to demand information about personal data related to oneself. Accordingly, "requesting information" is one of the personal data owner's rights in Art. 11 of the Personal Data Protection Law. In this context, the COMPANY provides the requested information to data owner in compliance with Art. 20 of the Constitution and Art. 11 of the Personal Data Protection Law.

3.3. Processing General and Sensitive Personal Data

The COMPANY is aware, that the protection of personal data is a constitutional right and obligation. Fundamental rights and freedoms may be limited, without interfering in their core and only by law, in accordance with the reasons, determined in related articles of the Constitution. According to Art. 20/3 of the Constitution, personal data may only be processed in situations prescribed by law or with explicit consent of the individual. Accordingly, the COMPANY only processes data by constitutional means, in cases prescribed in Art. 5/2 and Art. 6/3 of the Personal Data Protection Law and other legislations.

INVENT complies with the Personal Data Protection Law, secondary legislations and binding resolutions of Personal Data Protection Council in the matter of processing personal data, which are mentioned as “sensitive” by Personal Data Protection Law. Sensitive personal data are processed by INVENT in following situations, under the condition, that all necessary measures determined by the Personal Data Protection Council are taken:

- If explicit consent of data owner is available,
- If the processing your personal data is explicitly regulated in legislation,
- If necessary to protect the life or physical integrity of the data subject or another person when the data subject cannot give consent due to actual impossibility or lacks legal capacity,
- If the personal data are made public by the data subject, provided the processing is limited to the purpose of making public,
- If necessary to establish, exercise, or protect a right,
- If required for purposes of public health protection, preventive medicine, medical diagnosis, the management of treatment and care services, and the planning, management, and financing of health services, by individuals or institutions bound by confidentiality obligations,
- If processing is required to fulfill legal obligations in areas such as employment, occupational health and safety, social security, social services, or social assistance,
- If processing is carried out by non-profit organizations, such as foundations, associations, or other entities established for political, philosophical, religious, or trade union purposes, in accordance with relevant laws and within the scope of their activities, solely for current or former members, employees, or regular contacts of such organizations, without disclosing data to third parties.

3.4. Inland Transfer of Personal Data

INVENT may transfer the personal data and sensitive personal data of the data owner to third parties by taking precautions, which are necessary in line with lawful personal data processing purposes. In this context, the COMPANY complies with the regulations in Art. 8 of the Personal Data Protection Law.

INVENT may transfer the personal data to third parties, in compliance with legitimate and lawful personal data processing purposes and limited to one or more of the following data processing conditions, which are specified in Art. 5 of the Personal Data Protection Law.

- If explicit consent of data owner is available,
- If there is an explicit regulation in legislation regarding the transfer of data,
- If it is mandatory to protect the life or physical integrity of personal data owner or someone else and the data owner is not able to give consent by the reason of actual impossibility or his/her consent is legally not valid,
- If it is necessary to transfer personal data of agreement parties, on condition that it must be directly related to form or execute an agreement,
- If the data transfer is compulsory for the COMPANY to perform its legal obligations,
- If personal data is made public by its owner,
- If the data transfer is compulsory to establish, execute or protect a right,
- If the data transfer is compulsory for the COMPANY’s legitimate interests, on condition that fundamental rights and freedoms of data owner must remain unharmed.

If the due diligence is exercised, necessary security measures are taken, precautions determined by the Personal Data Protection Council are taken, INVENT may transfer the personal data to third parties, in compliance with legitimate and lawful personal data processing purposes and limited to one or more of the following data processing conditions, which are specified in Art. 6 of the Personal Data Protection Law:

- If explicit consent of data owner is available,
- If there is an explicit regulation in legislation regarding the transfer of data,
- If necessary to protect the life or physical integrity of the data subject or another person when

- the data subject cannot give consent due to actual impossibility or lacks legal capacity,
- If the personal data are made public by the data subject, provided the processing is limited to the purpose of making public,
 - If necessary to establish, exercise, or protect a right,
 - If required for purposes of public health protection, preventive medicine, medical diagnosis, the management of treatment and care services, and the planning, management, and financing of health services, by individuals or institutions bound by confidentiality obligations,
 - If processing is required to fulfill legal obligations in areas such as employment, occupational health and safety, social security, social services, or social assistance,
 - If processing is carried out by non-profit organizations, such as foundations, associations, or other entities established for political, philosophical, religious, or trade union purposes, in accordance with relevant laws and within the scope of their activities, solely for current or former members, employees, or regular contacts of such organizations, without disclosing data to third parties.

3.5. Outland Transfer of Personal Data

INVENT may transfer the personal data and sensitive personal data of the data subject to third parties, taking necessary security measures, in line with the legitimate purposes of personal data processing under the Personal Data Protection Law. In accordance with the law, if one of the conditions specified in Articles 5 and 6 of the Personal Data Protection Law exists and there is an adequacy decision issued by the Data Protection Council regarding the country, international organization, or sectors within the country where the data is to be transferred, personal data may be transferred abroad. INVENT acts in accordance with the provisions stipulated in Article 9 of the Personal Data Protection Law in this regard.

In the absence of an adequacy decision, the following conditions must be met for the transfer of personal data abroad:

- The existence of one of the conditions specified in Articles 5 and 6,
- The data subject must have the possibility to exercise their rights and access effective legal remedies in the country where the data is to be transferred,
- One of the appropriate safeguards as set out in the law must be provided by the parties.

The appropriate safeguards specified in the law are as follows:

- The existence of an agreement that is not an international treaty between public institutions and organizations abroad or international organizations and public institutions and organizations in Türkiye, and permission granted by the Council for the transfer,
- The existence of binding corporate rules approved by the Council, which contain provisions related to the protection of personal data, and which companies within a business group engaged in joint economic activities must comply with,
- The existence of a standard contract published by the Council that contains provisions related to data categories, the purposes of data transfer, recipients, technical and administrative measures to be taken by the data recipients, and additional measures for sensitive personal data,
- The existence of a written commitment containing provisions ensuring adequate protection, with permission granted by the Council for the transfer.

If the transfer is made with the standard contract assurance, the data controller or processor must notify the Council within five business days after the contract is signed.

In the absence of an adequacy decision and if the anticipated safeguards cannot be provided, the data controller and data processor may transfer data abroad on an occasional basis, and only if:

- The data subject has been informed of the potential risks and has given explicit consent for the transfer,
- The transfer is necessary for the performance of a contract between the data subject and the data controller or the implementation of pre-contractual measures taken at the request of the data subject,
- The transfer is necessary for the establishment or performance of a contract between the data controller and another natural or legal person, in the interest of the data subject,
- The transfer is required for the performance of an important public interest,
- The transfer is necessary for the establishment, exercise, or protection of a right,

- The transfer of personal data is necessary to protect the life or physical integrity of the data subject or another person when the data subject is unable to provide consent due to actual impossibility or lacks legal capacity,
- The transfer is necessary when access to a public record open to the public or to those with a legitimate interest is required under applicable legislation, provided the conditions for accessing the record are met and the legitimate interest holder requests it.

4. CATEGORIZATION OF PERSONAL DATA AND THEIR PURPOSES

4.1. Categorization of Personal Data

Below categorized personal data are processed, by informing concerned persons in accordance with Art. 10 of the Personal Data Protection Law within INVENT. To perform this personal data processing, the COMPANY must have legitimate and lawful personal data processing purposes, one or more of the personal data processing conditions in Art. 5 and Art. 6 of the Personal Data Protection Law must exist, the processing must be limited and lastly, compliance with principles and obligations in the Personal Data Protection Law, particularly principles regulated in Art. 4, must be provided.

- **Identity Information:** Driver license, passport, identity card and suchlike documents, involving information such as; name-surname, identity number, nationality, mother's name, father's name, birthplace, birthdate, sexuality and other data like; tax number, social security number, signature, number plate, etc.
- **Contact Information:** Telephone number, address, e-mail address, fax number, IP address.
- **Location Data:** Travel data, airplane ticket, hotel reservations, vehicle tracking system, etc.
- **Personnel Information:** All kinds of personal data processed to obtain information, that will prevent the establishment of personal rights belonging to a natural person, who has a labor relation with the COMPANY.
- **Legal Transaction:** Information about correspondences with judicial authorities, information in case file etc.
- **Customer Operation:** Call center records, invoice details, bill information, check information, information on pay-desk receipt, order information, request information etc.
- **Process Security:** IP address information, information about website entries and exits, password and code information etc.
- **Risk Management:** Information processed to manage commercial, technical and administrative risks etc.
- **Security Information:** Data acquired through records of entries and exits to physical location and the presence time there, camera records, fingerprint records, security records etc.
- **Financial Information:** Bank account number, IBAN number, financial profile, asset data, income details, signatory circular and data, that are processed in regard to information, documents and records, which indicate all financial results created in accordance with the relation established with the personal data owner.
- **Audio/Visual Information:** photo and camera records.
- **Professional Experience:** Diploma information, attended courses, vocational training details, certificates, transcript details etc.
- **Marketing:** Previous shopping information, poll, cookie records, information provided through campaign etc.
- **Medical Knowledge:** Information about disability status, blood type, personal health data, used medical devices and prosthesis etc.
- **Sensitive Personal Data:** Employees' medical reports, biometric data, blood type, compulsory reports in scope of occupational health and safety, documents for hard and dangerous works, that are asked to be collected by law etc.

4.2. Purposes of Personal Data Processing

INVENT processes the data limited to personal data processing purposes and conditions specified in Art. 5/2 and Art. 6/3 of the Personal Data Protection Law. These purposes and conditions are as follows;

- If the processing your personal data is explicitly regulated in legislation,

- If the processing your personal data is necessary and directly related to establishment or execution of a contract,
- If processing your personal data is compulsory for the COMPANY to fulfill a legal obligation,
- If your personal data are made public by yourself, but only limited to your purpose of making public,
- If processing your personal data is compulsory to establish, exercise and protect a right of yours, third party's or the COMPANY's,
- If processing your personal data is compulsory for the COMPANY's legitimate interests, on condition that fundamental rights and freedoms of data owner must remain unharmed,
- With respect to the processing of sensitive personal data, if one of the following conditions is met: the data subject's explicit consent has been obtained; if the processing is compulsory to protect the life or physical integrity of the data subject or another person in cases where the data subject cannot provide consent due to actual impossibility or lacks legal capacity; if the processing is carried out solely for the purposes of protecting public health, preventive medicine, medical diagnosis, management of treatment and care services, health services planning, and financing by individuals or institutions bound by confidentiality obligations; or if the processing is necessary to fulfill legal obligations related to employment, occupational health and safety, social security, social services, or social assistance.

Within this scope INVENT processes your personal data for following purposes;

- Planning and performing institutional sustainability actions,
- Activity and orientation management,
- Management of relations with business associates and suppliers,
- Management of INVENT's employment procedures,
- Performing financial reporting and risk management operations of the COMPANY,
- Management of the COMPANY's legal affairs,
- Planning and performing corporate communication operations,
- Performing corporate governance,
- Management of requests and complaints,
- Planning and performing inspections with the objective to assure the legislation-compliant management of INVENT's local and global procedures,
- Act for protection of INVENT's reputation,
- Management of investors relations,
- Informing public authorities in compliance with legislation,
- creating and monitoring visitor records.

In the event, that processing with mentioned purposes does not meet any of the conditions stated by the Personal Data Protection Law, your explicit consent regarding the processing procedure is received by the COMPANY.

5. PURPOSES OF PERSONAL DATA TRANSFER AND TRANSFERED THIRD PARTIES

INVENT, in accordance with the Art. 10 of the Personal Data Protection Law, informs the data owner on to whom personal data are transferred. INVENT, in accordance with the Art. 8 and 9 of the Personal Data Protection Law, may transfer personal data of individuals who are directed by this Policy, to below mentioned categories:

- i. Company partners,
- ii. Company suppliers,
- iii. Company shareholders,
- iv. Company authorities,
- v. Legally authorized public institutions and organizations,
- vi. Legally authorized private persons.

Personal data are transferred to above mentioned receiver groups with the following objectives;

- **Company partners:** To ensure, that the founding purpose of business partnership is accomplished.
- **Suppliers:** To provide services, that are supplied by INVENT to fulfil the COMPANY's commercial operations.

- **Shareholders**: To actualize INVENT's legislation-compliant operations in the fields of corporate law, activity management, corporate communication processes.
- **Company authorities**: To strategize INVENT's commercial operations in compliance with legislation, to provide top management and to make inspections.
- **Legally authorized public institutions and organizations**: For the purposes, requested by the related public institutions and organizations within their legal province.
- **Legally authorized private persons**: For the purposes, requested by the related private persons within their legal province.

6. DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

6.1. INVENT's Obligation to Delete, Destruct and Anonymize Personal Data

Despite the matter that personal data are processed in compliance with Art. 138 of the Turkish Penal Code and Art.7 of the Personal Data Protection Law, they will be deleted, destructed or anonymized directly or on demand of the data owner if the processing purpose disappears. In this context, INVENT fulfills its obligations through below specified methods.

6.2. Techniques of Personal Data Deletion, Destruction and Anonymization

6.2.1. Techniques of Personal Data Deletion and Destruction

Although INVENT processes personal data in compliance with legislation, mentioned personal data will be deleted, destructed or anonymized by INVENT's decision or on demand of the data owner if the processing purpose disappears. INVENT's commonly used deletion or destruction methods are as follows:

- Physical Destruction**: Personal data may also be processed by non-automatic ways on condition of being part of any data recording system. While such data are deleted/destructed, physical destruction system, that prevents their reuse, is used.
- Secure Erasure From Software**: While deleting/destructing personal data, that are processed and preserved by completely or partially automatic ways, deletion methods preventing the reuse of personal data will be used.
- Secure Outsource Erasure When Required**: INVENT may come to terms with an expert for deletion of personal data on its behalf. In such case, personal data are securely deleted/destructed by the expert in an irrecoverable way.

6.2.2. Techniques of Personal Data Anonymization

Anonymizing personal data means, preventing the data from being associable with a particular or identifiable natural person even by matching the data with others. INVENT may anonymize lawfully processed personal data, if the processing purpose disappears. According to Art. 28 of the Personal Data Protection Law, anonymized personal data may be processed for purposes like research, planning or statistic. Such operations are out of the Law's scope and do not require data owner's explicit consent. Anonymizing methods preferred by INVENT are listed below;

- Masking,
- Consolidation,
- Data Derivation.

7. RIGHTS OF THE DATA OWNER, EXERCISE AND ASSESSMENT OF THESE RIGHTS

INVENT notifies the personal data owner about his/her rights in accordance with Article 10 of the Law and guides the data owner about how to use these rights. The Company manages channels, administrative and technical regulations, required in compliance with Art. 13 of the Law to inform the data owners and assessment their rights.

7.1. Data Owner's Rights and Exercise of these Rights

7.1.1. Rights of the Data Owner

Personal data owner has following rights:

- to learn whether the personal data related to you are/have being processed,

- if it is processed, to request information with regard to processing,
- to learn purposes of the processing and whether your personal data has been used for the intended purpose
- to know the third parties within or outside the country to whom the personal data are transferred,
- to request correction of the personal data if the data is processed incompletely or inaccurately,
- to request deletion or destruction of the personal data under the conditions set forth in Article 7 of the Law No. 6698 on Personal Data Protection,
- to request notifying third persons to whom the personal data are transferred, about the processes completed within the scope of Art 11/d-e of the Law,
- to object to negative consequences about you that are concluded as a result of analysis of the processed personal data exclusively by automatic means,
- to claim indemnification if the you suffered damage due to illegal processing of your personal data.

7.1.2. Situations, in which the Data Owner May Not Assert His/ Her Rights Personal data owners may not request above mentioned rights in situations which are kept out of the Law's scope by Art. 28 of the Personal Data Protection Law.

- 1) Process of personal data for purposes like research, planning and statistic by anonymizing through official statistics.
- 2) Process of personal data for purposes such as; art, history, literature, science or within the scope of freedom of speech, on condition that personal data must not violate national defense, national security, public order, economic security, right of privacy or personal rights.
- 3) Process of personal data within preventive, protective and informative operations, that are conducted by legally authorized public organizations and institutions in order to ensure national defense, national security, public order, public safety and economic security.
- 4) Process of personal data by judicial and executive authorities in relation to investigation, prosecution, adjudgment and execution operations.

According to Art. 28/2 of the Personal Data Protection Law; personal data owners may not request above mentioned right, excluding recover loss, in following situations:

- 1) If processing personal data is necessary for crime investigation or avoiding crime commitment.
- 2) Processing personal data, which are anonymized by data owner.
- 3) If process of personal data by legally authorized public organizations, institutions and public professional organizations is necessary to conduct discipline investigations or prosecutions and inspection or regulation obligations.
- 4) If processing personal data is necessary to protect state's economic and financial interests, in relation to budget, tax and fiscal issues.

7.1.3. Exercise of Data Owner's Rights

Personal data owners may claim their above-mentioned rights by sending the signed Application Form to the COMPANY after filling it in with identifying information and documents through following methods or other methods determined by Personal Data Protection Council.

- 1) Fill in the form in www.inventanalytics.com and send a copy of it with wet signature to "Reşitpaşa Mahallesi Katar Caddesi No:4/1/302 Sarıyer/Istanbul" by personal application or by notary public.
- 2) Sign with your electronic signature or mobile signature and send it to invent@hs03.kep.tr by using your Registered Electronic Mail (REM) address or the e-mail address registered to the data recording system of the COMPANY.

If the application is made by a third person on behalf of personal data owner, notarial special power of attorney must be submitted.

7.2. Responses to Applications

It is only necessary to apply INVENT in cases, where the COMPANY is indicated as data controller by Personal Data Protection Law. This is possible when the COMPANY collects data directly from the related individual. Apart from these, applications for data processes in which other companies are deemed as data controller, must be submitted to the related company.

7.2.1. Procedures and durations of Responses

INVENT will respond to personal data owner's duly request, depending on its qualification, free of charge within 30 days from its arrival to INVENT. If your application necessitates an incremental cost, you will have to pay the price determined by "Notification on the Procedures and Principles of Application to the Data Officer". If there is a written response to your application, there will be no charge for the first 10 (ten) pages, and a transaction fee of 1 TL will be charged for each page above 10 (ten) pages. If the response to your application is given in a recording medium such as a CD or flash memory, the exigible cost will be no more than the cost of the recording medium.

7.2.2. Information, Which May Be Requested from the Applicant Data Owner

INVENT may request information from the concerned person to identify if the applicant is data owner or not. In order to clarify the issues in the application, the COMPANY may address questions to personal data owner about the application

7.2.3. Right to Reject the Application of Data Owner

INVENT may reject the application in following situations, by indicating its reason:

- 1) Process of personal data for purposes like research, planning and statistic by anonymizing through official statistics,
- 2) Process of personal data for purposes such as; art, history, literature, science or within the scope of freedom of speech, on condition that personal data must not violate national defense, national security, public order, economic security, right of privacy or personal rights.
- 3) Process of personal data within preventive, protective and informative operations, that are conducted by legally authorized public organizations and institutions in order to ensure national defense, national security, public order, public safety and economic security.
- 4) Process of personal data by judicial and executive authorities in relation to investigation, prosecution, adjudgment and execution operations.
- 5) If processing personal data is necessary for crime investigation or avoiding crime commitment.
- 6) Processing personal data, which are anonymized by data owner.
- 7) If process of personal data by legally authorized public organizations, institutions and public professional organizations is necessary to conduct discipline investigations or prosecutions and inspection or regulation obligations.
- 8) If processing personal data is necessary to protect state's economic and financial interests, in relation to budget, tax and fiscal issues.
- 9) If personal data owner's request has possibility to violate others' rights and freedoms.
- 10) If nonproportional effort requiring requests are made.
- 11) If requested information is public.