

## CLARIFICATION TEXT

The main purpose of the law on protection of personal data No 6698 the processing of personal data, particularly to protect the fundamental rights and freedoms of individuals to privacy and the obligations of real and legal persons who process personal data should comply with the principles and procedures that regulate. In addition, according to the Constitution of the Republic of Turkey, everyone has the right to request the protection of personal data about him. As regards the protection of personal data, which is a constitutional right, we, as Chief Data Officer **Mavili Elektronik Ticaret ve Sanayi A.Ş.(hereinafter the “Company”)** are most sensitive to the security of your personal data. Our company is managed by this policy and clarification text; It takes the necessary care to protect the personal data of employees, employee candidates, company officials, visitors, customers, employees, shareholders, officials and third parties of the companies we cooperate with and makes this a company policy. In this context, the necessary administrative and technical measures are taken by our company in order to protect the personal data processed in accordance with the relevant legislation.

This clarification text contains a summary of the Personal Data Protection Policy which is created and implemented within our company.

You may obtain our detailed Personal Data Protection Policy from our company.

### Definitions

- **Related Person / Real Person:** Owner of the personal data,
- **Recording media:** Any medium in which personal data is processed in non-automatic ways, whether fully or partially automated or part of any data recording system,
- **Data Processor:** A real or legal person who processes personal data on his behalf, based on the authority given by the data officer,
- **Data Controller:** The real or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system,
- **Law No. 5651:** Law on the regulation of publications made on the Internet and the fight against crimes committed through these publications,
- **Law No. 6698** refers to the Law on the protection of personal data.

## 1. Data Controller

In accordance with the protection of personal data law no.6698 **Mavili Elektronik Ticaret ve Sanayi A.Ş.**, you are entitled as “Data Officer” and you can reach us through the contact information provided below.

**Company** : **Mavili Elektronik Ticaret ve Sanayi A.Ş.**  
**Address of Headquarter** : Şerifali Mahallesi Kutup Sokak No:27/1-2-4 Ümraniye / İstanbul  
**Branch Address** :  
**Website** : [www.mavili.com.tr](http://www.mavili.com.tr)  
**Telephone** : 0 216 466 45 05  
**KEP Address** : [mavilielektronik@hs01.kep.tr](mailto:mavilielektronik@hs01.kep.tr)

## 2. Method and Legal Reason of Personal Data Collection

Your personal data is collected by our company in order to carry out our activities by our company with a minimum level of information through different channels and on the basis of reasons for compliance with laws, regulations and company policies. During your contact with our company and / or during the establishment of your legal relationship and during the continuation of such relationship, we will ask you, partnerships, group companies, affiliates, other institutions with which we cooperate or have contractual relations, from our Dealers, Authorized Sales and Authorized Services and official institutions;

During call center, internet, mobile applications, social media and other public channels, customer visits, organizations, customer satisfaction surveys and similar activities, during fair organizations, training organizations, visits to our facilities and fulfillment of our commercial relations or contractual obligations. for the purpose of oral, written and visual recording with camera systems.

Personal data may also be processed and transferred for the purposes specified in this disclosure text within the scope of the personal data processing requirements and purposes specified in Articles 5 and 6 of the law, in accordance with the basic principles stipulated by the law Personal Data Protection.

### **Your personal data;**

- (1) Fulfillment of our legal obligation to provide sales and after-sales warranty services to our customers,
- (2) Fulfilling our legal obligation for our employees to comply with the Labor Code and other laws and regulations,
- (3) Fulfilling our legal obligation to keep and supply spare parts for the services and products we offer,
- (4) Fulfilling our legal obligation to provide technical support services to our customers during and after the warranty period,

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- (5) Clearly stipulated in the legislation that our company is subject to,
- (6) Provided that it is directly related to the establishment or execution of a contract to which our company is a party, it is necessary to process the personal data of the parties to the contract, to provide the requested products and services, and to fulfill the requirements of the contracts you have concluded,
- (7) To be required to fulfill the legal obligation,
- (8) Publicized by the person concerned himself
- (9) Data processing is mandatory for the establishment, use or protection of a right,
- (10) Data processing is mandatory for the legitimate interests of the data responder, provided that it does not harm the fundamental rights and freedoms of the person concerned.
- (11) Having your explicit consent,

**Your private personal data is collected, stored and processed based on the following reasons for compliance with the law:**

- (1) Having your explicit consent,
- (2) Personal data other than health, without seeking explicit consent in cases prescribed by law,
- (3) Health-related personal data only for the protection of Public Health, in our company, the provision of health services by the company doctor and medical diagnosis, treatment and care services, the execution of persons under the obligation to keep secrets with the aim of our company without seeking the explicit consent of the person concerned by the competent institution or doctor.

By the methods described above, your personal data is collected and processed for the purpose of providing it in accordance with laws and regulations.

**For the purpose of establishing, exercising and protecting a right;**

**To protect the legitimate interest of our company;**

- Keeping camera records in order to ensure physical space security,

Your personal data will be retained for the reasonable period of time and statutory statute of limitations specified in the relevant legislation or until the purpose of processing is eliminated.

### 3. Personal Data Processing Policies

- (1) Disclosure and inform personal data owners,
- (2) Setting up the system for personal data owners to use their rights,

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- (3) Taking necessary technical and administrative measures in the protection of personal data,
- (4) Processing personal data in accordance with the law and integrity rules,
- (5) Keep personal data accurate and up-to-date when needed,
- (6) Processing personal data for specific, explicit and legitimate purposes,
- (7) Limited and measured processing of personal data in connection with the purpose for which they are processed,
- (8) Comply with relevant legislation and regulations of the Personal Data Protection board in the transfer of personal data to third parties in accordance with the requirements of the purpose of processing,
- (9) Demonstrate the necessary sensitivity to the processing and protection of personal data of special quality.
- (10) Storing personal data for the period of time required by the relevant legislation or for the purpose for which they are processed,

The personal data collected may be processed for the following purposes, both in accordance with the basic principles set forth by the law on Personal Data Protection and the principles **Mavili Elektronik Ticaret ve Sanayi A.Ş.** set forth above by our company and within the personal data processing requirements and purposes set forth in Articles 5 and 6 of the law on Personal Data Protection.

#### 4. The Purpose of Personal Data Processing

Your personal data to be obtained within the scope of your relationship with our company may be processed for the purposes set out below within the personal data processing requirements and purposes set out in Articles 5 and 6 of the Personal Data Protection law. Your personal data in summary;

- (1) Clearly stipulated in the law that our company is engaged in related activities,
- (2) Fulfillment of our legal obligations arising from contracts, contract management,
- (3) Establishment of legal proceedings and follow-up of legal processes,
- (4) Planning and management of Corporate governance and Corporate communication activities ,
- (5) Management of Investor and Partnership Relations,
- (6) The processing of your personal data by our company is mandatory for the establishment, use or protection of the rights of our company, you or third parties,
- (7) Planning and execution of corporate activities,
- (8) The processing of personal data is mandatory in order to fulfill our company's legal obligations,
- (9) Meeting information demands from public institutions and organizations,

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- (10) Providing legal and commercial security (financial reporting and risk management, execution/follow-up of legal affairs ),
- (11) Planning, auditing and execution of information security processes,
- (12) Fulfilling and monitoring of financial and / or accounting transactions in accordance with the law,
- (13) Ensuring facility and personnel security,
- (14) Planning and execution of emergency management processes,
- (15) Reporting to law enforcement in the event of a crime or violation of law,
- (16) Evaluation of suggestions/requests/complaints to be communicated by customers through all kinds of channels, answering and making improvement works in accordance with notifications,
- (17) Execution of our human resources processes (Personnel Selection and placement processes for employees and employees candidates, employment maintenance processes, fulfillment of legal obligations during employment, employment termination processes) and our activities,
- (18) Provided that your personal data has been publicly disclosed to you, your personal data will be processed by our company in a limited manner for publicization purposes.,
- (19) It is mandatory to perform personal data processing activities for the legitimate interests of our company, provided that it does not harm your fundamental rights and freedoms,
- (20) The personal data processing activity by our company is mandatory for the protection of the life or body integrity of the personal data holder or someone else, and in this case the personal data holder is unable to disclose his consent due to actual or legal invalidity,
- (21) Personal data holder's health and sexual life outside of the special quality of personal data provided for in the law,
- (22) The protection of Public Health in respect of personal data of the private nature of the personal data holder's health and sexual life, conduct preventive medicine, medical diagnosis, treatment and care services, to plan and manage health services and financing, to be processed by persons under the obligation to keep secrets or by authorized institutions and organizations,
- (23) Managing relationships with partners or suppliers,
- (24) Fulfillment of our obligation to provide after-sales services,
- (25) In the event that the processing activity performed for the said purposes does not meet any of the requirements stipulated in the Personal Data Protection law, the company is provided with your explicit consent with respect to the related processing process.

**5. Obtaining and Processing Personal Data**

**(1) Processing of personal data of website users (online visitors) and WIFI service users;**

- (a) Users who use our website may submit information [www.mavili.com.tr](http://www.mavili.com.tr) such as first name, last name, e - mail, message, sector and the subject of the form by filling out a form from the contact address on our website or to the info mail address of our company in order to make requests and suggestions.
- (b) Users agree that they share this personal data on the site of their own volition. This personal data will only be processed for the purpose of evaluating requests and suggestions made by users.
- (c) In addition, "traffic information", consisting of the IP address of the users who visit our website, the start and end time of the service provided, the type of service used, the amount of data transferred and, if any, subscriber credentials, is processed in accordance with law No. 5651.

**(You can review our detailed cookie policy on our website)**

**(2) Processing of Personal Data of Suppliers and Customers;**

- (a) The personal data obtained and processed at minimum level belonging to a real person supplier, supplier employee and / or supplier officer for the purpose of tracking and performing the product, service or goods procurement processes of our company
- (b) Personal data of our customers processed in order to meet our legal obligations arising from the product or (Provision of After-Sales Technical Support Service, supply and possession of spare parts and provision of spare parts liability ) service from which they received the personal data of our customers processed at a minimum level
- (c) The relevant data (Name-Surname, telephone, address, telephone number, e-mail address, product technical information about the product supplied or the product purchased by the customer ) is kept in the CRM and ERP environment and in the company phones.

**(3) Processing of information about our company personnel;**

- (a) This information belongs to the employees of our company and is kept in personnel files, payroll program and common area, with the express consent of the employees, at the minimum level required by the relevant law.
- (b) Employees during the time they work this information is contained in the personnel file, the information of the departed employees is stored in accordance with the relevant law and then destroyed.

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- (c) Upon the request of the customers, the resume information of our employees is shared with the customers with the explicit consent of the employee in order to continue the business activities of the company,
- (d) Our company cannot store personal data in the phones, computers and tools etc. that it embezzles to employees, in case of Return of the equipment, all information in the device is cleared and it cannot make any demands regarding employee personal data.
- (e) For the purpose of working in our Company, personal data in applications made over the internet is used and destroyed only in the evaluation process. The candidates called for the interview receive explicit consent that the resume information will be stored for the relevant period of time. Applications are filed and destroyed at the end of the period.

### **6. To whom and for what Purpose the Processed Personal Data may be Transferred;**

Your collected personal data may be transferred as expressly provided by law, or may be transferred in the following cases,

- (1) Stemming from our obligations to our customers purchase the product or service you purchased the product or service for the purpose of meeting with the aim of after-sale technical services and authorized the execution of the warranty process our dealers, business partners, our group companies, our affiliates, shareholders and suppliers,
- (2) Labor law, OHS and environmental regulations for our employees to fulfill our obligations to SSI, banks, consulates and other official institutions for passport transactions and to our customers by obtaining the express consent of the employee;
- (3) Law enforcement agencies, law enforcement agencies, courts, Executive directorates;
- (4) Our company stores personal data about online and physical visitors as required by legislation and may share it with relevant public institutions and organizations upon request.
- (5) Personal data relating to suppliers may be shared with the relevant public bodies when necessary in relation to the goods, products or services provided.
- (6) Personal data set out in articles 8 and 9 of the Personal Data Protection law may be transferred in a limited manner by taking the necessary security measures within the framework of the processing requirements and objectives.
- (7) Your personal data will not be used for the purposes specified above and will not be shared or transferred to third parties other than legal obligations and government agencies/organizations.

## **7. Ensuring the Security and Confidentiality of Personal Data**

Our company in accordance with Article 12 of Personal Data Protection law, the unlawful processing of personal data the personal data that are in operation and prevent unlawful access to your personal data to ensure the appropriate level of security to ensure the safekeeping of all necessary technical and administrative measures.

### **7.1 Technical Measures Taken to Ensure the Lawful Processing of Personal Data and to Prevent Unlawful Access to Personal Data**

- (1) Technical measures are taken to the extent that technology allows,
- (2) Working with a team of experts on technical issues,
- (3) Inspections for the implementation of measures taken at regular intervals are carried out,
- (4) Software and infrastructure are being developed to ensure security,
- (5) Access to the data being processed within the company is audited,
- (6) It takes hash encryption, log, access management and physical security measures to ensure that information systems containing personal data are protected against unauthorized access and illegal data processing,
- (7) Backup process is performed for secure storage of personal data,
- (8) Web site and all systems hosting personal data are protected by the network firewall on which it is located
- (9) Related technological solutions are used to protect personal data processing systems from malicious software,
- (10) Infiltration and weakness tests are applied to all our systems and continuous controls are provided within our company,

Our company has taken all kinds of technical and technological security measures in order to protect your personal data and has protected your personal data against potential risks,

### **7.2 Administrative Measures Taken to Ensure the Lawful Processing of Personal Data and to Prevent Unlawful Access to Personal Data**

- (1) Training and awareness raising activities and awareness training of company employees related to Personal Data Protection law,
- (2) In the case of personal data transfer, ensuring that the party to whom the personal data is transferred will carry out the data security is included in the contracts concluded with the persons to whom the personal data is transferred,
- (3) Determination of what needs to be fulfilled for compliance with the Personal Data Protection law and preparation of internal policies for its implementation,
- (4) Taking necessary measures for physical access,



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- (5) To ensure the destruction of all personal data which is eliminated for the purposes of personal data processing by holding regular evaluation meetings for the necessity analysis of personal data collected, processed and transferred both in and out of the institution,
- (6) By organizing Board meetings, performs and makes decisions on protective administrative measures for the security of all processes and personal data
- (7) Budgets are created and invested in order to protect personal data in line with board decisions or by following technology development,

### 7.3 Measures To Be Taken In Case Of Unlawful Disclosure Of Personal Data

- (1) In the event that the processed personal data is obtained by others through unlawful means, our company will prevent the data leak by initiating the necessary analysis work on all systems to detect the brand of the data leak.
- (2) In the event that the processed personal data is obtained by others through unlawful means, our company will notify the relevant data holder and the board as soon as possible.

## 8. Keeping Personal Data Accurate and Up-to-date of the Personal Data

The groups of people have accepted and declared the responsibility to be borne completely belongs to them that whom we process personal data are shared on the Website and / or that they personally provide, that the personal data received due to the contractual relationship are accurate and up-to-date, that they have the right to exercise their rights in the meaning of the P Personal Data Protection Law and that other relevant legislation is important. You may make changes and/or updates to the personal data you have shared by contacting us via our website.

## 9. Retention Times, Deletion, Destruction and Anonymity of Personal Data

In accordance with Article 7 of the Personal Data Protection law, personal data is deleted, destroyed or made anonymous by our company at the request of the owner of the personal data or if the reasons for processing of the personal data are eliminated, even though the personal data has been processed in accordance with the relevant legislation.

The procedures and principles relating to this matter shall be fulfilled according to the law of the Personal Data Protection and the secondary legislation which shall be based on this law.

### 9.1 Storage Time Of Personal Data

- The personal data of the Physical Online visitors—Internet Access log records—are retained for 2 years in accordance with the Law No. 5651;
- CCTV records of the physical visitors are retained for 30 days;
- Personal data of our employees relating to their Personal Information and Identifying Information are retained for 10 years after termination of their employment contracts,

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unless a special case is in question (A Legal Action or any other operative legal process);

- Personal data of our employees relating to their professional experiences are retained for 10 years after termination of their employment contracts, unless a special case is in question (A Legal Action or any other operative legal process);
- The personal data processed through legal actions initiated against the Employees, Suppliers, Customers, Dealers, Services, and other third persons, and the case files are retained for 5 years following the finalisation of that legal process;
- Under no circumstances may a sensitive personal data, i.e. Religious provided in the former identity cards, be processed. Pursuant to the applicable law, former identity cards shall be replaced with the new ones until 01/01/2021; thereafter this information shall be completely removed from our records (Personal files and other files);
- Pursuant to the OHS and Labour Law, the information relating to health status of our employees are retained for 10 years after termination of their employment contracts; within the frame of the OHS legislation, the health status report of the employees of our Suppliers (submitted to evidence that the health status of the employee is admissible for performance of the relevant work) and their health-related information and documents/certificates, if exist, are completely deleted (without recoding them into the system) after the relevant work is completed;
- Health-related information of the employees of our Suppliers, fully employed in our Company, are retained for 6 months after termination of the sub-contract concluded with the relevant subcontractor or termination of the employment contract of such employee with the subcontractor, and then deleted/destroyed;
- Criminal conviction-related information on the Criminal Record (under the title “Criminal Convictions and Security Measures”) submitted by our employees and interns are retained for 1 year after termination of their employment contract;
- Information relating to Finance and Marketing (data obtained from our contracted customers by means of questionnaires) are retained for 2 years after the trade relation with the relevant customer is ended;
- After termination of the legal and business relation, the personal data related with our Suppliers, Customers, Dealers, Authorised Services, and business partners, invoices and other financial records, are retained for 10 years pursuant to the legislation;
- In the case that no business operation has been initiated with a Candidate Supplier, Potential Lead, Trained Customer, or Potential Customer, the quotations, requests, records of the trainings provided, contact information (including the questionnaires) relating thereto are kept for 5 years for monitoring of the works and trainings, if there is no legal ground;
- Location data obtained from the vehicle tracking system used for the security of our Company’s vehicles are kept for 1 year;

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- Customer Personal Data are retained for 10 years after the guarantee period, set forth by law for the goods and/or services provided, expires. (Pursuant to the law, we are obliged to provide spare parts for 10 years; therefore, your data is anonymized and continued to be processed);
- CV or employment application forms sent by the candidates for the open positions are reviewed during the recruitment process, and the information provided therein are retained for 1 year;
- The processed financial data relating to our shareholders and partners are retained for 2 years.

### 9.2 Deletion or Destruction Personal Data

Destruction or anonymization of personal data in physical and digital media personal data processed for the purposes specified in this Personal Data Protection Policy Summary and clarification text;

- (1) When the purpose required to be processed in accordance with Article 1 of Law No. 6698 is eliminated and the periods determined by the laws in accordance with Article 138 of the Turkish Penal Code are expired or the purpose of retention is eliminated, all personal data will be deleted, destroyed or used anonymously and will continue to be used by us.
- (2) Our company continues to use the data by deleting, destroying or anonymizing personal data by using one or more techniques best suited to its business processes and activities, one of the methods of anonymization specified in the guidelines for the deletion, destruction or anonymization of personal data published by the Personal Data Protection Board when the retention periods stipulated in the legislation or storage times required by processing purpose.

### 9.3 Techniques For Anonymizing Personal Data

It means that personal data, even by matching it with other data, cannot be associated with any real person who is identified or identifiable.

For anonymization: efforts have been started to perform masking, generating data, using aliases, aggregating and dimming operations.

## 10. Rights Of The Person Whose Personal Data Is Processed

If, as the personal data holders of the personal data set out in Article 11 of the Personal Data Protection law, you submit your claims regarding your rights to our company by the methods set out below in this clarification text, our company will conclude the request free of charge within thirty days at the latest, depending on the nature of the request. However, if a fee is provided by the Personal Data Protection Board, the fee will be charged at the tariff set by our company.

Within this scope, personal data holders;

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- (1) To learn whether or not personal data has been processed,
- (2) To request information on the processed data, if personal data has been processed,
- (3) To learn the purpose of processing the personal data and whether or not the personal data has been used in accordance with the declared purpose,
- (4) To know about the third parties at home and abroad, to which the personal data has been transferred,
- (5) In case that the personal data is incomplete or incorrectly processed, to request their correction and to inform the third parties to whom the personal data is transferred,
- (6) To request the deletion or destruction of personal data in the event that the reasons for its processing are eliminated, even though it has been processed in accordance with the provisions of Personal Data Protection law and other related laws, and to request that the transaction performed in this context be notified to third parties to whom the personal data was transferred,
- (7) To object to any consequence that may arise against himself/herself through the analysis of the processed data exclusively by means of automated systems,
- (8) In the event that personal data is damaged due to illegal processing, it has the right to request that the damage be remedied.

In accordance with Article 11 and Article 13, paragraph 1 of the Personal Data Protection law, you are required to submit your request for the exercise of your above-mentioned rights to our company through written or other methods determined by the Personal Data Protection Board. Within this frame, the channels and procedures through which you will submit your application in writing for the applications you will make to our company under Article 11 of the Personal Data Protection law are described below.

In accordance with paragraph 1 of Article 13 of the law, the applications to be made to the company responsible for data regarding these rights must be communicated to us in writing or by other methods determined by the Personal Data Protection Board ("Board"). In this context, "written" applications to our company, [www.mavili.com.tr](http://www.mavili.com.tr) through our web site or service address will be obtained from Personal Data Protection Law Application Form complete by filling in;

- (1) By sending our service address to the company given in the data officer field as return receipt requested;
- (2) By sending to our company service address given in the field of data officer via notary public;
- (3) Signature with "secure electronic signature" defined in Electronic Signature Law No. 5070 and forwarded to the registered e-mail (REA) address given in the data officer field of our company,
- (4) By filling out the form and applying to the related facility in person,

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The channels mentioned above are “written” application channels in accordance with paragraph 1 of Article 13 of the law. This form can be filled in and applied to the related facility in person, after the announcement of other methods to be determined by the board and by return receipt requested mail via notary public, our company will announce the manner in which the applications will be received through these methods.

### **11. Changes and updates to this Clarification Text**

Our company may make changes or updates in this disclosure text in accordance with relevant legal regulations, changes in company policy and changes in internal processes related to personal data. All of these changes and updates are reflected in the new text to the relevant people through the website.