

TÜRKİYE PETROL RAFİNERİLERİ
ANONİM ŞİRKETİ
POLICY FOR PROTECTION AND PROCESSING OF
PERSONAL DATA

TÜRKİYE PETROL RAFİNERİLERİ ANONİM ŞİRKETİ
POLICY FOR PROTECTION AND PROCESSING OF PERSONAL DATA
INFORMATION FORM

Document Name:

Türkiye Petrol Rafinerileri Anonim Şirketi Policy for Protection and Processing of Personal Data

Target Segment:

All natural persons except the employees of Türkiye Petrol Rafinerileri Anonim Şirketi, whose personal data are processed by Türkiye Petrol Rafinerileri A.Ş.

Prepared by:

Türkiye Petrol Rafinerileri A.Ş. Personal Data Protection (PDP) Committee

Version:

[2].[0]

Approved by:

Approved by Senior Management of Türkiye Petrol Rafinerileri Anonim Şirketi.

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23/07/2019

If there is any discrepancy between original Turkish version and any translated version of the Policy, Turkish version must be taken into consideration.

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CONTENTS

1. SECTION 1 - INTRODUCTION.....	3
1.1. INTRODUCTION.....	3
1.2. SCOPE.....	3
1.3. IMPLEMENTATION OF POLICY AND APPLICABLE LEGISLATIONS.....	3
1.4. EFFECTIVITY OF POLICY.....	3
2. SECTION 2 - ISSUES FOR PROTECTION OF PERSONAL DATA	4
2.1. ENSURING THE SECURITY OF PERSONAL DATA.....	4
2.2. PROTECTION OF SPECIAL CATEGORIES OF PERSONAL DATA	4
2.3. INCREASING AND AUDITING THE AWARENESS OF BUSINESS UNITS FOR PROTECTION AND PROCESSING OF PERSONAL DATA.....	4
3. SECTION 3 - ISSUES FOR PROCESSING OF PERSONAL DATA	5
3.1. PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH PRINCIPLES REQUIRED BY LEGISLATIONS	5
3.2. CONDITIONS FOR PROCESSING PERSONAL DATA	5
3.3. PROCESSING THE SPECIAL CATEGORIES OF PERSONAL DATA	6
3.4. INFORMING THE OWNER OF PERSONAL DATA.....	7
3.5. TRANSFER OF PERSONAL DATA.....	7
4. SECTION 4 - CATEGORIZATION AND PURPOSES OF PROCESSING OF PERSONAL DATA, PROCESSED BY OUR COMPANY	8
5. SECTION 5 - STORAGE AND DESTRUCTION OF PERSONAL DATA	8
6. SECTION 6 - RIGHTS OF THE OWNERS OF PERSONAL DATA AND EXERCISING THESE RIGHTS	8
6.1. RIGHTS OF THE OWNERS OF PERSONAL DATA.....	8
6.2. EXERCISING OF RIGHTS BY PERSONAL DATA OWNER.....	9
6.3. REPLY OF OUR COMPANY TO APPLICATIONS	9
ANNEX 1 – Purposes of Processing Personal Data	10
ANNEX 2 - Personal Data Owners	11
ANNEX 3 - Personal Data Categories.....	12
ANNEX 4 - Third Persons, to Whom Personal Data are Transferred by our Company, and Purposes of Transfer ..	14

1. SECTION 1 - INTRODUCTION

1.1. INTRODUCTION

Protection of personal data is one of the most important priorities of Türkiye Petrol Rafinerileri Anonim Şirketi ("**Company**"). Türkiye Petrol Rafinerileri Anonim Şirketi Policy for Protection and Processing of Personal Data ("**Policy**") describes the principles adopted for execution of personal data processing activities by our Bank as well as the basic principles adopted for compliance of our Company's data processing activities with the regulations mentioned in the Law No. 6698 on Protection of Personal Data ("**Law**") and so our Company informs the owners of personal data and ensures necessary transparency and by being fully aware of our responsibility herein, your personal data are processed and protected under our Policy.

Activities performed by our Company for protection of personal data of our employees is managed under the Policy on Protection and Processing of Personal Data of Employees of Türkiye Petrol Rafinerileri Anonim Şirketi, which is prepared in parallel with the principles of this Policy.

1.2. SCOPE

This policy is for all personal data of persons other than our Company's employees, which are processed automatically or non-automatically, provided that they are a part of any data recording system. Detailed information about these owners of personal data can be found in ANNEX2 of the Policy ("**ANNEX 2 - Owners of Personal Data**").

1.3. IMPLEMENTATION OF POLICY AND APPLICABLE LEGISLATIONS

Currently effective legal arrangements for processing and protection of personal data will be initially applied. If there is any discrepancy between currently effective legislations and this Policy, our Company agrees that currently effective legislations will be applied. The Policy materializes and arranges legislative rules in accordance with the Company's practices.

1.4. EFFECTIVITY OF POLICY

This Policy, issued by our Company is dated 23/07/2019. If all or certain articles of this Policy are renewed, the Policy's effective date will be updated. The Policy is published on the website of our Company (<https://www.tupras.com.tr>) and made available for relevant persons upon a request of personal data owners.

2. SECTION 2 - ISSUES FOR PROTECTION OF PERSONAL DATA

2.1. ENSURING THE SECURITY OF PERSONAL DATA

Our Company takes necessary measures, based on the type of data to be protected, in order to prevent illegal disclosure, access, and transfer of personal data or any other security deficiency in accordance with Article 12 of the Law. For this purpose, our Company takes administrative measures to achieve necessary level of security in accordance with the guides published by the Personal Data Protection Board ("**Board**") and makes or causes necessary audits to be made.

2.2. PROTECTION OF SPECIAL CATEGORIES OF PERSONAL DATA

Importance is attributed by the Law to sensitive personal data since it has a risk to cause discrimination or unjust treatment of data owner when they are illegally processed. Such "special categories" of personal data are the data related with race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance, membership to an association, society or labor union, health, sexual life, criminal sentence, and security measures and biometric and genetic data.

For this purpose, any technical and administrative measure taken by our Company to protect personal data are also applied diligently to special categories of personal data and our Company ensures that necessary audits are performed.

Detailed information on protection of special categories of personal data are given in Section 3.3 of this Policy.

2.3. INCREASING AND AUDITING THE AWARENESS OF BUSINESS UNITS FOR PROTECTION AND PROCESSING OF PERSONAL DATA

Our Company provides necessary trainings to business units in order to increase the awareness for preventing illegal processing of and illegal access to personal data and for storage of such data.

Our Company establishes necessary systems to create awareness of our current employees and recently recruited employees for protection of personal data and, if needed, works together with advisors. For this purpose our Company evaluates participations to relevant trainings, seminars and informative sessions and organizes new trainings in parallel with updates to applicable legislations.

3. SECTION 3 - ISSUES FOR PROCESSING OF PERSONAL DATA

3.1. PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH PRINCIPLES REQUIRED BY LEGISLATIONS

3.1.1. Processing in accordance with Laws and Rules of Integrity

Personal data are processed in accordance with the rules of general trust and integrity in a manner so as not to impair fundamental rights and freedom of persons. Accordingly, personal data are processed to the extent it is required by operations of our Company.

3.1.2. Ensuring that Personal Data are Correct and, if necessary, Updated

Our Company takes necessary measures to ensure that personal data are correct and updated when they are processed and establishes the mechanisms to ensure that correctness and up-to-dateness of personal data are maintained at certain periods.

3.1.3. Processing for Certain, Clear and Legitimate Purposes

Our Company clearly specifies the purposes of processing personal data and processes them in accordance with its business operations and for purposes in connection with these operations.

3.1.4. Being Connected and Restricted with the Purpose of Processing and to the Extent Required by that Purpose

Our Company collects personal data only to the extent and in the type required by its business operations and it processes them only for specified purposes.

3.1.5. Keeping Personal Data for the Period Prescribed by Applicable legislations or as Required for the Purpose of Processing

Our Company keeps personal data as long as they are required for their purpose of processing and throughout the minimum term prescribed by applicable legislations. For this purpose, our Company initially determines whether any period is prescribed in applicable legislations for keeping personal data or not and, if any period is prescribed, it acts accordingly. If there is not any legal period, personal data are stored for the period needed for their purpose of processing. Personal data are destroyed at the end of their storage period in accordance with their periodical periods of destruction or upon an application of the data owner and through the determined methods of destruction (deletion and/or elimination and/or anonymization).

3.2. CONDITIONS FOR PROCESSING PERSONAL DATA

Although the basis of processing of personal data can be any of the following other than full consent of the owner of personal data, more than one of the following conditions can also be considered as legal basis. If processed data are special categories of personal data, the conditions written in Section 3.3 of this Policy (“**Processing of Special Categories of Personal Data**”) will be applied.

(i) Express Consent of the Owner of Personal Data

One of the conditions to process personal data is express consent of the owner of personal data. Express consent of the owner of personal data must be given with his/her free will and based on being informed for a certain issue.

If below conditions for processing of personal data are available, personal data can be processed without requiring express consent of the data owner.

(ii) Clear Requirement by Laws

If it is clearly required by the laws, in other words, if there is a clear provision in the applicable laws for processing of personal data, it is possible to mention that there is a condition for processing the data.

(iii) Failure to Obtain Full Consent of Relevant Person due to Physical Impossibility

If it becomes necessary to process the personal data of a person, who cannot provide his/her full consent or his/her full consent cannot be accepted as valid due to physical impossibility, in order to save his/her or another person's life or physical integrity, the personal data of such data owner can be processed.

(iv) Directly in Connection with Execution or Performance of an Agreement

If it is required to process the personal data, this condition will be deemed fulfilled, provided that it is directly related with the execution or performance of an agreement, to which the data owner is a party.

(v) Fulfillment of the Company's Legal Obligation

If it is required to process personal data in order for our Company to fulfill its legal obligations, the personal data of data owner can be processed.

(vi) Publicizing of Personal Data by Its Owner

If data owner has publicized his/her personal data, such personal data can be processed as limited with the purpose of publicizing.

(vii) Obligation to Process the Data to Establish or Protect a Right

If it is required to process the data in order to establish, exercise or protect a right, the personal data of data owner can be processed.

(viii) Obligation to Process the Data for Legitimate Interests of our Company

If it is required to process the data for legitimate interests of our Company, the personal data of data owner can be processed, provided that fundamental rights and freedoms of the personal data owner are not impaired.

3.3. PROCESSING THE SPECIAL CATEGORIES OF PERSONAL DATA

Special categories of personal data are processed by our Company in accordance with the principles specified herein and by taking all necessary administrative and technical measures, including the methods to be determined by the Board, and in case any of the following conditions occur:

- (i) Special categories of personal data other than those related with health and sexual life,** can be processed without requiring any express consent if it is clearly required by the laws, in other words, if there is a clear provision in applicable laws for processing of such personal data. Otherwise, express consent of the data owner will be required.
- (ii)** Special categories of personal data related with health and sexual life can be processed by persons, who are obliged to keep these data secret, or by authorized entities and organizations without requiring an express consent for purposes of protection of public health, provision of preventive medicine, medical diagnosis, treatment and health services, and planning and management of health services and financing. Otherwise, express consent of the data owner will be required.

3.4. INFORMING THE OWNER OF PERSONAL DATA

As the data controller of personal data, our Company informs personal data owners about who has processed the personal data, why the personal data have been processed and with whom they were shared, which methods were used to collect them, the legal reasons and rights of personal data owners for processing of personal data in accordance with Article 10 of the Law and secondary legislations.

3.5. TRANSFER OF PERSONAL DATA

Our Company may transfer personal data and special categories of personal data of personal data owner to third parties (public entities, suppliers, etc.) by taking necessary security measures in accordance with legal purposes of processing of personal data. For this purpose, our Company is acting in accordance with the regulations, prescribed by Article 8 of the Law. Detailed information about this subject can be found in ANNEX 4 (***“ANNEX 4- Third Parties, to Whom Personal Data are Transferred by our Company and Purposes of Transfer”***).

3.5.1. Transfer of Personal Data

If one or several of the following conditions occur, our Company may transfer personal data to third parties by paying necessary attention and taking all necessary security measures, including the methods required by the Board even if there is not any express consent of the owner of personal data.

- If the activities regarding transfer of personal data are clearly required by laws;
- If transfer of personal data by the Company is directly related with and required for execution or performance of an agreement;
- If it is required to transfer personal data in order for our Company to fulfill its legal obligations;
- If personal data are transferred by our Company restricted with the purpose of publicizing, provided that such data have already been publicized by the data owner;
- If transfer of personal data by the Company is required for establishment, exercising or protection of the rights of the Company or data owner or third persons;
- If it is required to transfer personal data for the Company's legitimate interests, provided that fundamental rights and freedoms of data owner are not impaired;
- If it is required to protect the life or physical integrity of the person, who cannot give his/her consent due to physical incapability or whose consent is not legally valid, or of another person.

In addition to those listed above, personal data can be transferred to foreign countries, which are declared by the Board to have sufficient protection measures, (***“Foreign Country with Sufficient Protection”***), if any of above conditions occur. If there is not sufficient protection, personal data can be transferred to foreign countries, which are allowed by the Board and for which the data controllers in Turkey and in the relevant country undertake to provide sufficient protection in written (***“Foreign Country with Data Controller that Undertakes to Provide Sufficient Protection”***), in accordance with data transfer conditions required by applicable legislations.

3.5.2. Transfer of Special Categories of Personal Data

Special categories of personal data are processed by our Company **in accordance with the principles specified herein and by taking all necessary administrative and technical measures**, including the methods to be determined by the Board, and in case any of the following conditions occur:

- (i) **Special categories of personal data other than those related with health and sexual life**, can be processed without requiring any express consent if it is clearly required by the laws, in other words, if there is a clear provision in applicable laws for processing of such personal data. Otherwise, express consent of the data owner will be required.
- (ii) Special categories of personal data related with health and sexual life can be processed by persons, who are obliged to keep these data secret, or by authorized entities and organizations without requiring an express consent for purposes of protection of public health, provision of preventive medicine, medical diagnosis, treatment and health services, and planning and management of health services and financing. Otherwise, express consent of the data owner will be required.

In addition to those listed above, personal data can be transferred to **Foreign Countries with Sufficient Protection** if any of the above conditions occur. If there is not sufficient protection, personal data can be transferred to **Foreign Countries with Data Controller that Undertakes to Provide Sufficient Protection** in accordance with data transfer conditions required by applicable legislations.

4. SECTION 4 - CATEGORIZATION AND PURPOSES OF PROCESSING OF PERSONAL DATA, PROCESSED BY OUR COMPANY

Personal data are processed in our Company in accordance with general principles specified in the Law, particularly the principles specified in Article 4 of the Law pertaining to the processing of personal data and based on at least one of the conditions of personal data processing specified in Articles 5 and 6 of the Law according to our Company's purposes of processing personal data by informing relevant persons as per Article 10 of the Law and secondary legislations. Categories of personal data that are processed in accordance with the purposes and conditions described herein and detailed information about these categories can be found in ANNEX 3 ("**ANNEX 3- Personal Data Categories**") document, attached hereto.

Detailed information about these purposes of processing of personal data can be found in ANNEX 1 of the Policy ("**ANNEX 1 - Purposes of Processing of Personal Data**").

5. SECTION 5 - STORAGE AND DESTRUCTION OF PERSONAL DATA

Our Company keeps personal data as long as they are required for their purpose of processing and throughout the minimum term prescribed by applicable legislations. For this purpose, our Company initially determines whether any period is prescribed in applicable legislations for keeping personal data or not and, if any period is prescribed, it acts accordingly. If there is not any legal period, personal data are stored for the period needed for their purpose of processing. Personal data are destroyed at the end of their storage period in accordance with their periodical periods of destruction or upon an application of the data owner and through the determined methods of destruction (deletion and/or elimination and/or anonymization).

6. SECTION 6 - RIGHTS OF THE OWNERS OF PERSONAL DATA AND EXERCISING THESE RIGHTS

6.1. RIGHTS OF THE OWNERS OF PERSONAL DATA

Owners of personal data have below rights:

- (1) To inquire whether their personal data have been processed or not;
- (2) If their personal data have been processed, to request information about such processing;

- (3) To inquire the purpose of processing of personal data and whether such data have been used in accordance with the said purpose or not;
- (4) To know the third parties in or abroad, to whom the personal data have been transferred;
- (5) If personal data have been processed incompletely or inaccurately, to request rectification of such data and notification of third parties, to whom the personal data were transferred, about such rectifications;
- (6) If, despite of processing in compliance with the provisions of the Law and other applicable laws, the reasons that require processing of personal data are no longer available, to request deletion or destruction of personal data and to request the third parties, to whom the personal data were transferred, to be notified about the actions performed under this sub-paragraph;
- (7) To object to occurrence of any result that is to her/his detriment by means of analysis of personal data exclusively through automated systems;
- (8) To request compensation for the damages in case they suffer damages due to unlawful processing of personal data.

6.2. EXERCISING OF RIGHTS BY PERSONAL DATA OWNER

Personal data owners may submit their requests for their rights, listed in Section 6.1.'de ("***Rights of Personal Data Owners***") to our Company through the methods specified by the Board. They can use <https://www.tupras.com.tr/kisisel-verilerin-korunmasi> "Türkiye Petrol Rafinerileri A.Ş. Data Owner Application Form" for this purpose.

6.3. REPLY OF OUR COMPANY TO APPLICATIONS

Our Company takes all administrative and technical measures necessary to conclude the applications of personal data owner in accordance with the Law and secondary legislations.

If personal data owner submits his/her request for the rights listed in Section 6.1 ("***Rights of Personal Data Owners***") to our Company in accordance with described procedures, our Company will meet such request as soon as possible and not later than 30 (thirty) days free of charge, based on the nature of request. However, if the action requires any separate cost, the tariff determined by the Board can be taken.

ANNEX 1 – Purposes of Processing Personal Data

MAIN PURPOSES (PRIMARY)	SUB-PURPOSES (SECONDARY)
Planning and executing human resources policies and processes of our Company	Planning human resources processes
	Execution of staff recruitment processes
	Planning and execution of human resources needed for production
	Planning and execution of intern and student recruitment, placement and operation processes
Performance of necessary works by our relevant business units in order to perform commercial activities of our Company and execution of related business processes	Planning and execution of supply chain management processes
	Planning and execution of information access authorizations of partners and suppliers
	Planning, auditing and execution of information security processes
	Planning and execution of corporate management activities
	Planning and execution of corporate communication activities
	Monitoring finance and accounting works
	Planning and execution of business activities
	Event management
	Planning and execution of corporate sustainability activities
	Monitoring the contract processes and legal requests
Performance of necessary works by our business units in order to ensure that relevant persons can benefit from the products and services offered by our Company	Tracking the customer requests and complaints
	Planning and execution of customer relationship management processes
	Planning and execution of processes for sales of products and services
	Management of relationships with partners and suppliers
Planning and execution of commercial and business strategies of the Company	Planning and execution of workers' health and safety processes
Ensuring the legal, technical, and commercial-business security of the Company and relevant persons that have business relationship with the Company	Monitoring the legal works
	Creating and tracking visitor logs
	Planning and execution of operational activities needed to ensure that the Company's activities are performed in accordance with the Company's procedures and applicable legislations
	Providing information to competent authorities as required by laws
	Planning and execution of production and operational risk processes of the Company
	Planning and execution of emergency management processes
	Performing the companies and partnership law transactions
	Ensuring security of the Company's operations
	Ensuring the security of the Company's locations and facilities
	Planning and execution of internal audit activities

ANNEX 2 - Personal Data Owners

CATEGORIES OF PERSONAL DATA OWNERS	DESCRIPTION
Customer	Natural persons, who are using or have used the products and services offered by our Company regardless of having a contractual relationship with our Company or not
Visitor	Natural persons, who have entered physical locations of our Company or have visited our website
Third Person	Third party natural persons, who are associated with above mentioned parties in order to ensure the security of commercial transactions between our Company and these persons or to protect the rights and interests of these persons (e.g. their family members and relatives) or other natural persons not covered by the Policy for Protection and Processing of Personal Data of Employees of Türkiye Petrol Rafinerileri Anonim Şirketi.
Employee Candidate	Natural persons (including candidate interns), who have applied to our Company through any means in order for a job or have allowed our Company to examine their resumes and other relevant information.
Company Shareholder	Natural persons that are shareholders of our Company
Company Representative	Member of board of directors of our Company and other authorized natural persons
Employees, Shareholders and Representatives of Organizations which we Collaborate	Natural persons, who are employees, shareholders and representatives of organizations (including but not limited with partners, suppliers), with which our Company is in a business relationship.

ANNEX 3 - Personal Data Categories

PERSONAL DATA CATEGORIES	DESCRIPTION
Identity Details	These are the data that include identity details of the person, such as name and surname, Turkish Republic ID, nationality, date and place of birth, sex, workplace details, registration ID, tax ID, title, biography, etc. and documents, such as driving license, occupational identity card, identity card and passport
Communication Details	Phone number, address, e-mail, fax number
Location Data	Details about the current location of employees of organizations, with which we collaborate, for emergency procedures.
Details of Family Members and Relatives	Details about family members and relatives of personal data owner in relation with products and services that we offer or in order to protect legal and other interests of our Company and data owner in accordance with our Company's operations
Customer Details	Data about the customer obtained during the performance of our commercial operations
Customer Transaction Details	Records for the use of our products and services by our customers and information, such as instructions and requests of our customers for the use of our products and services
Physical Location Security Details	Personal data regarding logs and documents kept for entering to and staying within a physical location; surveillance camera records, vehicle logs and records taken at security point, etc.
Transaction Security Details	Your processed personal data to ensure our technical, administrative, legal and commercial security during the performance of our operations (e.g. logs, IP details, authentication details)
Financial Details	Personal data processed for any information, document and record that show financial results created as a result of legal relationship between our Company and personal data owner and personal data, such as bank account number, IBAN number, income details, debit/credit details, etc.
Details of Employee Candidate	Resume details of employee and/or intern candidates that have applied for a job to our Company through any means
Special Categories of Personal Data	The data related with race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance, membership to an association, society or labor union, health, sexual life, criminal sentence, and security measures and biometric and genetic data of persons
Request/Complaint Management Details	Personal data for receiving and evaluating any request or complaint, submitted to our Company
Audio and Visual Data	Photograph and camera records (excluding the records covered by Physical Location Security Details) and voice records
Audit and Inspection Details	Personal data processed to execute operational, financial, abusing and compliance audit operations of our Company.
Legal Action and Compliance	Personal data processed to identify and track our legal rights and receivables and to fulfill our legal liabilities and debts in accordance with our Company's policies

Transaction Details	Data, such as questionnaires, declarations, shopping details, call center records, membership details, which were processed in relation with products or services offered as a part of our operations or in order to protect legal and other interests of the Company and personal data owner
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ANNEX 4 - Third Persons, to Whom Personal Data are Transferred by our Company, and Purposes of Transfer

Our Company can transfer personal data of its customers to the categories of persons listed below in accordance with Articles 8 and 9 of the Law:

- (i) Partners
- (ii) Suppliers
- (iii) Shareholders
- (iv) Legally Authorized Private Persons
- (v) Legally Authorized Public Entities and Organizations
- (vi) Koç Holding Anonim Şirketi
- (vii) Koç Group Companies

The scope of persons listed above, to which the data can be transferred, and the purposes of transfer are written below.

Persons, to Whom Data can be Transferred	Definition	Data Transfer Purpose
Partner	Data controller parties, with which our Company establishes partnerships for purposes, such as to perform various projects or to receive services individually or together with Group companies while performing its commercial operations: Mercer Danışmanlık A.Ş. to receive flexible benefits; Allianz Sigorta A.Ş. and Ram Sigorta Aracılık Hizmetleri A.Ş. to perform insurance processes; Koç Holding Pension and Provident Fund Foundation for vested benefits and interests provided to employees; Yapı ve Kredi Bankası A.Ş. and other Banks to perform financial processes; Aon Hewitt to increase employee satisfaction and loyalty	Limited with to fulfill the requirements of our legal relationships with partners
Supplier	Parties that provide service to our Company in accordance with data processing purposes and instructions of our Company in order to perform our Company's commercial operations	Limited with the purpose to ensure that services, which are needed to perform our Company's commercial operations and which are received from outsourced suppliers, are provided;
Our Shareholders	Koç Holding Anonim Şirketi, which is authorized to design the strategies and audit activities for our Company's	Limited with the purposes of designing and auditing the strategies for our

	commercial operations according to the provisions of applicable legislations	Company's commercial operations according to the provisions of applicable legislations
Legally Authorized Public Entities and Organizations	Public entities and organizations that are authorized to receive information and documents from our Company according to the provisions of applicable legislations For example, CMB, EMRB, Competition Board, etc.	Limited with the purpose, requested by relevant public entity and organization under its legal authority
Legally Authorized Private Persons	Means entities or organizations that were established in accordance with certain legally determined conditions and do operate in accordance with applicable laws (e.g. independent auditors).	Personal data, limited with subjects covered by the operations of these private entities and organizations, are shared with them.
Koç Holding A.Ş.	Koç Holding A.Ş.	Limited with the purpose to ensure performance of corporate communication, strategic planning, human resources, commercial and audit operations, which require the participation of Koç Group Companies.
Koç Group Companies	<i>(A list of Koç Group Companies can be found at www.koc.com.tr.)</i>	Limited with the purpose of evaluation by other Koç Group Companies for recruitment processes if expressly consented by the data owner