

LOGO GROUP COMPANIES
POLICY ON PROTECTION, PROCESSING,
RETENTION AND DISPOSAL OF
PERSONAL DATA

11.05.2021

CONTENT

1. DEFINITIONS	3
2. PURPOSE OF THE POLICY ON RETENTION AND DISPOSAL OF PERSONAL DATA.....	4
3. SCOPE AND AMENDMENT OF THE POLICY	4
4. CONDITIONS FOR PROCESSING OF PERSONAL DATA	5
5. PROCESSING OF SENSITIVE PERSONAL DATA	5
6. GENERAL PRINCIPLES ON PROCESSING OF PERSONAL DATA	6
7. CATEGORIES OF DATA SUBJECTS	7
8. PERSONAL DATA COLLECTION METHODS	7
9. PURPOSES FOR PROCESSING OF PERSONAL DATA	8
10. PERSONAL DATA RECORDING MEDIUMS.....	9
11. TRANSFER OF PERSONAL DATA	9
11.1. Transfer of Personal Data at Home.....	9
11.2. Transfer of Personal Data Abroad.....	9
11.3. Third Parties to Whom Personal Data May Be Transferred.....	10
12. CONFIDENTIALITY AND SECURITY OF PERSONAL DATA	10
12.1. Reasons for Retention and Disposal of Personal Data.....	10
12.1.1. Legal, Technical and Other Reasons for Retention of Personal Data	10
12.1.2. Legal, Technical and Other Reasons for Disposal of Personal Data	11
12.2. Measures towards Secure Retention of Personal Data and Prevention of Unlawful Processing and Access	11
12.2.1. Technical Measures.....	11
12.2.2. Administrative Measures	11
12.3. Measures Towards Lawful Disposal of Personal Data.....	12
12.3.1. Technical Measures.....	12
12.3.2. Administrative Measures	12
12.4. Personal Data Protection Committee	12
12.5. Products and Services Provided by Third Party Institutions	12
13. DISPOSAL OF PERSONAL DATA	13
13.1. Erasure of Personal Data	13
13.2. Destruction of Personal Data.....	13
13.3. Anonymization of Personal Data	13
14. PERSONAL DATA RETENTION AND DISPOSAL PERIODS	14

15. PERIODIC DATA DISPOSAL PERIODS AT LOGO GROUP COMPANIES14

16. RIGHTS OF THE DATA SUBJECT AND PROCEDURES FOR EXERCISING THESE RIGHTS14

16.1. Rights of the Data Subject.....14

**16.2. Cases Where the Law Shall Not Be Applied and the Data Subject May Not Exercise
 His/Her Rights.....15**

16.3. Procedures for Exercising the Rights of the Data Subject16

16.4. Responding to Data Subject's Application16

16.5. Data Subject's Right of Complaint to the Board16

ANNEX-1 APPLICATION FORM17

VERSION HISTORY21

1. DEFINITIONS

Anonymization	Rendering personal data impossible to link with an identified or identifiable natural person, even in conjunction with other data.
Application Form	The form drafted by Logo Group Companies, published on the Website and provided in Annex-1 of this Policy, in order to enable Data Subjects to exercise the rights provided under article 11 of the Law on Protection of Personal Data and apply to Logo Group Companies for this purpose.
Applications	Applications developed by Logo Group Companies and available on Google Play Store or AppStore for download to be used in computers, mobile phones, tablets or other compatible devices.
Audit Firm	Persons selected among sworn-in CPA or independent accountant and financial advisor license holders and approved by the Public Oversight, Accounting and Auditing Standards Authority, to conduct independent audits for the purpose of obtaining sufficient and adequate independent audit evidence indicating that financial tables and other financial data of Logo Group Companies are accurate and comply with financial reporting standards, by auditing, assessing and reporting based on ledgers, records and documents using the independent audit techniques set forth under audit standards.
Authority	Personal Data Protection Authority
Board	Personal Data Protection Board
Data Controller	The natural or legal person who determines the purposes and means of the processing of personal data and is responsible for establishment and management of the data registry system.
Data Processor	The natural or legal person who processes personal data on behalf of data controller upon his authorization.
Data Registry System	The registry system where Personal Data is recorded after being structured according to certain criteria.
Data Subject	The natural person whose personal data is being processed.
Destruction	The operation of rendering Personal Data inaccessible, irrecoverable and non-reusable in any way by anyone.
Disposal of Personal Data	Erasure, destruction or anonymization of Personal Data
Erasure	The operation of rendering Personal Data inaccessible and non-reusable in any way for the Relevant Users.
Explicit Consent	Freely given, specific and informed consent.
Law	The Law no.6698 on the Protection of Personal Data.
Logo Group Companies	The list of Logo Group Companies is published on the Website. The term “Logo Group Companies” may be used in this Policy to refer to one, some or all of those companies.
Personal Data	Any information relating to an identified or identifiable <i>natural person</i> , including but not limited to name-surname, address, identity number, phone number and e-mail.
Policy	Defines this “Logo Group Companies Policy on Protection, Processing, Retention and Disposal of Personal Data”.

Processing of Personal Data	Any operation performed upon personal data such as obtaining, recording, storage, conservation, alteration, re-organization, disclosure, transmission, taking over, making available, classification or preventing the use thereof, fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means.
Relevant User	Persons processing Personal Data within Logo Group Companies organization or in accordance with the authority and instructions given by Logo Group Companies, excluding the person or the unit responsible for technical storage, protection and backup of Personal Data.
Sensitive Personal Data	Any data relating to the Data Subject's race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs of similar nature, clothing, association, foundation or trade-union memberships, health, sexual life, convictions and security measures as well as biometric and genetic data are defined as sensitive personal data.
Website	Can be used to refer to one, some or all of Logo Group Companies' websites including but not limited to www.logo.com.tr , www.elogo.com.tr , www.store.logo.com.tr , www.diyalogo.com , www.efatura.diyalogo.com.tr , www.e-mutabakat.logo.com.tr , www.berqnet.com , www.divaportal.com , www.isbasi.com , www.forum.logo.com.tr , www.support.logo.com.tr .

2. PURPOSE OF THE POLICY ON RETENTION AND DISPOSAL OF PERSONAL DATA

The purpose of this Policy is to inform the *natural persons* whose Personal Data is processed by Logo Group Companies acting as data controller, on the processes, means and purposes of collection, processing, retention, protection and disposal of their Personal Data as well as their rights under the Law and the means of exercising such rights.

3. SCOPE AND AMENDMENT OF THE POLICY

This Policy, containing information in accordance with the Law and other applicable legislation on Personal Data, shall enter into force on the date of publication on www.logo.com.tr website. The Policy may be updated from time to time as a result of legal amendments, changes in the Personal Data processing processes of Logo Group Companies or other reasons. Any update shall be effective on the date of publication of the new Policy on the Website. In case of any conflict between the Turkish version of the Policy and it's translations, Turkish version shall be taken into consideration.

4. CONDITIONS FOR PROCESSING OF PERSONAL DATA

Processing of Personal Data means any operation performed upon personal data such as obtaining, recording, storage, conservation, alteration, re-organization, disclosure, transmission, taking over, making available, classification or preventing the use thereof, fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means.

Pursuant to Article 5 of the Law, Personal Data shall not be processed without the explicit consent of the Data Subject. However, also pursuant to the same Article; Personal Data may be processed without explicit consent of the Data Subject in any of the following cases:

- **Where it is expressly provided for by the laws:** *For example; providing information on employees' salaries upon a request by the Tax Office.*
- **Where processing of personal data is mandatory in order to protect the life or physical integrity of the Data Subject or another person where the Data Subject is physically incapable of giving consent or whose consent is not deemed legally valid.**
- **Where processing of personal data of the parties of a contract is necessary, provided that it is directly related to the execution or performance of a contract:** *For example; receiving bank and account details of the creditor in order to make payments in accordance with a contract, sharing the buyer's name-surname and address with the courier company for delivery of a product subject to a distant sales contract.*
- **Where processing of personal data is mandatory for the data controller to fulfill his legal obligations:** *For example; receiving an employee's bank and account details for salary payments, information on his/her dependents, whether his/her spouse is employed and his/her social security details.*
- **Where the data concerned is made available to the public by the Data Subject himself.**
- **Where personal data processing is mandatory for establishment, exercise or protection of a right:** *For example; using certain data as proof during legal proceedings instituted by an employee.*
- **Where processing of personal data is mandatory for the legitimate interests of the data controller, provided that such processing shall not violate the fundamental rights and freedoms of the related person [Data Subject]:** *For example; processing of employees' Personal Data to be used for designation of promotions, wage increases or social rights or to serve as a basis for assignment of posts during reorganization of an enterprise, provided that such processing shall not violate the fundamental rights and freedoms of the employees.*

5. PROCESSING OF SENSITIVE PERSONAL DATA

Any data relating to the data subject's race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs of similar nature, clothing, association, foundation or trade-union memberships, health, sexual life, convictions and security measures as well as biometric and genetic data are defined as sensitive personal data.

Pursuant to Article 6 of the Law, it is prohibited to process sensitive Personal Data without the explicit consent of the data subject. However, personal data listed above, other than those relating to health and sexual life may be processed without the explicit consent of the data subject only where it is expressly stipulated by laws.

Data relating to health and sexual life may be processed by persons under the obligation of confidentiality or authorized institutions and organizations without the explicit consent of the data subject for the purposes of protection of public health, operation of preventive medicine, medical

diagnosis, treatment and care services and planning, management and financing of health care services.

In addition, adequate measures specified by the Board must be taken during processing of sensitive Personal Data.

6. GENERAL PRINCIPLES ON PROCESSING OF PERSONAL DATA

Pursuant to Article 4 of the Law, Personal Data may only be processed in compliance with the procedures and principles set forth under the Law and other laws. Complying with certain principles while processing Personal Data is compulsory, as stipulated under the same article.

In this respect, Logo Group Companies process your Personal Data in accordance with the following principles:

- **Lawfulness and conformity with rules of bona fide:** Logo Group Companies do not collect or process any Personal Data without informing the Data Subject; they process Personal Data in accordance with law, the Law and other applicable legislation.
- **Accuracy and being up to date, where necessary:** Logo Group Companies make all reasonable efforts to ensure that Personal Data is accurate and up-to-date. Accordingly, in order to ensure that Personal Data is accurate and up-to-date, Logo Group Companies keeps the relevant channels open, enables rectification of Personal Data upon Data Subject's application or ex officio when inaccuracy is detected.
- **Being processed for specific, explicit and legitimate purposes:** Purposes of Personal data processing by Logo Group Companies have been explicitly specified in accordance with the obligation to inform. Logo Group Companies process Personal Data for legitimate purposes in accordance with the Law and in connection with their business activities and/or the services they provide.
- **Being relevant with, limited to and proportionate to the purposes for which they are processed:** Logo Group Companies process Personal Data for specified, explicit and legitimate purposes. Accordingly, Logo Group Companies ensure that Personal Data is collected for the purposes specified under this Policy or the consent to be obtained from the Data Subject (Explicit Consent) and retained for the period of time necessary for such purpose; avoid processing of Personal Data not related to fulfillment of the purpose and/or not necessary; processes only the Personal Data required for fulfillment of the purpose.
- **Being retained for the period of time stipulated by relevant legislation or the purpose for which they are processed:** Logo Group Companies comply with the period of time stipulated under the applicable legislation, if any, for retention of Personal Data. In the event no such period has been stipulated, Personal Data shall be retained only for a period of time necessary for the purpose for which they are processed.

7. CATEGORIES OF DATA SUBJECTS

Natural persons whose Personal Data may be processed by Logo Group Companies are categorized and explained in detail below.

Data Subject	Explanations
Applicant	Natural persons applying to Logo Group Companies and sending questions, requests, suggestions, complaints, applications, including those related to Personal Data, in written or oral form or through electronic means. Other data subjects under this category may also be applicants.
Application User	Natural persons downloading/using the Applications developed and released by Logo Group Companies on devices with a mobile operating system.
Company Executive	Natural persons assigned in senior management of Logo Group Companies and/or authorized to represent Logo Group Companies. Board of director members are in this category.
Employee	Persons listed under Logo Group Companies' payroll with or without an employment contract and students/graduates completing their internship (compulsory/voluntary) at Logo Group Companies.
Natural Person Client	Any natural person or proprietorship benefiting from or considered for benefiting from products or services provided by Logo Group Companies with or without a contract.
Natural Person Collaborating Firms	Natural persons and proprietorships collaborating with Logo Group Companies for performance of a specific job and sharing the profit upon completion of the job.
Natural Person Reseller	Proprietorships, which are Logo Group Companies' non-exclusive business partners and solution partners, reselling software use licenses purchased from Logo Group Companies, LEM and other maintenance/support services to clients/end users on their behalf and at their own risk or providing software consultancy services for clients/end users.
Natural Person Service Provider Firms	Natural persons and proprietorships providing services to Logo Group Companies with or without a contract. Subcontractors are also considered under this category.
Natural Person Supplier	Natural persons and proprietorships providing the goods or services necessary for providing products and services by Logo Group Companies.
Participant	Natural persons attending activities such as events, competitions, trainings organized by Logo Group Companies.
Persons Related to Clients	Shareholders/partners, executives, employees, dealers and agencies, employees of dealers of natural or legal person clients of Logo Group Companies.
Persons Related to Collaborating Companies	Shareholders/partners, executives and employees of natural or legal persons collaborating with Logo Group Companies.
Persons Related to Resellers	Shareholders/partners, executives and employees of natural or legal person resellers of Logo Group Companies
Persons Related to Suppliers	Shareholders/partners, executives and employees of natural or legal person suppliers of Logo Group Companies
Potential Employee	Persons sending their resumes to Logo Group Companies to be employed by or to complete their (compulsory/voluntary) internship at

	Logo Group Companies.
Shareholders	Natural persons owning a share in one or more Logo Group Companies.
Visitor	All natural persons being physically present at Logo Group Companies' premises, whether or not for the purpose of providing or receiving a product or service; and natural person visitors of the Website, regardless of their status as a member of the Website, who submit their data over the Website or whose personal data is collected in accordance with the terms of use of the Website. Other data subjects under this category may also be Website visitors.

8. PERSONAL DATA COLLECTION METHODS

Logo Group Companies collect and process Personal Data in accordance with the provisions under this Policy, the Law and other applicable legislation, making use of written, oral, electronic means, video/audio recording or vis-a-vis with the Data Subject.

Personal Data Collection process may be carried out through: i) Website, Applications, e-mail, digital mediums or software, including recruitment portals; ii) contracts, applications, forms, call center, remote support, sales and marketing unit, Website cookies, business cards, phone etc; or iii) vis-a-vis interviews with Data Subjects.

9. PURPOSES FOR PROCESSING OF PERSONAL DATA

Logo Group Companies process Personal Data for specified, explicit and legitimate purposes. In this respect, Personal Data may be processed for the following purposes:

- Negotiation, conclusion and performance of a contracts,
- Providing products and services,
- Customizing of available products and services according to demands; updating and improving the available products and services due to client needs, legal and technical developments,
- User registration to the systems, specifically for available products and services,
- Providing call center and remote support services; tracking the number and content of calls,
- Advertising new or existing products, services and campaigns; conducting sales and marketing activities,
- Conducting market research,
- Producing statistics and analysis of product use,
- Payment and collection of product and service fees; selection of the payment collection method,
- Contact/communication,
- Maintaining commercial relations with collaborating companies, suppliers, resellers and service providing companies,
- Reporting purposes within the framework of collaboration,
- Evaluating business partner applications submitted by resellers,
- Developing business strategies and plans of the company,

- Being contacted by Logo Group Companies for satisfaction surveys,
- Offering discounts for shopping from partner websites and establishments,
- Keeping record of participants, preparation of certificates/participation certificates, determination of prize/gift receivers and giving of prizes/gifts at events/trainings organized by Logo Group Companies,
- Management of judicial/administrative processes, responding to requests from public institutions and organizations, performing legal obligations in accordance with legislative regulations, settlement of legal disputes,
- Maintaining investor relations,
- In the event of a merger, demerger, transfer of the company in whole or in part; execution of the results arising from this legal procedure,
- Introducing employees of Logo Group Companies, Natural Person Resellers/Clients, Persons Related to Resellers/Clients on social media platforms,
- Conducting job interviews, evaluating job applications,
- Establishing, maintaining and concluding business relationships/contracts,
- Ensuring that employees of Logo Group Companies benefit from primary and secondary rights arising from their employment contracts, assessing their performance and activities,
- Creating user accounts for employees, handing out company ID cards and meal cards,
- Organization of transport of company employees, tracking of company pool vehicles,
- Creating participation records of employees in case of attending an organization on behalf of the company,
- Creating records of employees' attendance to trainings and certificates received,
- Keeping and tracking visitor records,
- Ensuring interior and environmental security of the company and security of the Website and Applications,
- Analysis of Website use,
- Creating personal data inventory,
- Evaluating and responding to all questions, requests, suggestions, complaints, applications, including those related to Personal Data, in written or oral form or through electronic means.

10. PERSONAL DATA RECORDING MEDIUMS

Personal Data collected by Logo Group Companies may be recorded on a variety of mediums depending on the nature, purposes of processing and frequency of use of Personal Data. In this context, Logo Group Companies may record Personal Data on;

- Mediums such as paper, software, cloud, central server, portable media or database;
- Peripheral systems such as network devices, flash based media, magnetic tapes, mobile phones, optical discs, printers, entrance/security systems.

11. TRANSFER OF PERSONAL DATA

11.1. Transfer of Personal Data at Home

Pursuant to Article 8 of the Law, Personal Data shall not be transferred to third parties without the explicit consent of the data subject.

However, Personal Data may be transferred to third parties without need to obtain the Data Subject's explicit consent, upon existence of one of the conditions where it is not necessary to seek the Data Subject's explicit consent, as provided for under article 4 of the Policy.

11.2. Transfer of Personal Data Abroad

Pursuant to Article 9 of the Law, Personal Data shall not be transferred abroad without the explicit consent of the data subject.

However, Personal Data may be transferred abroad without the need to obtain the Data Subject's explicit consent upon existence of one of the following conditions:

- Existence of any of the conditions set forth under article 4 or 5 of this Policy, where the Data Subject's consent is not deemed necessary for processing,
- Where the relevant foreign country ensures an adequate level of protection,
- If the relevant country does not ensure an adequate level of protection; where controllers in the relevant foreign country and in Turkey make a written declaration that they will ensure an adequate level of protection and it is approved by the Board.

The countries with adequate level of protection are determined and announced by the Board.

Without prejudice to the provisions under international agreements, in cases where the interests of the Republic of Turkey or the Data Subject are under serious risk, Personal Data may be transferred abroad solely by obtaining the opinion of the relevant public institution or organization and approval of the Board.

11.3. Third Parties to Whom Personal Data May Be Transferred

In order to fulfill the purposes set forth under article 9 of this Policy, Logo Group Companies may transfer Personal Data to the following third parties, who may be natural or legal persons at home or abroad, in accordance with Articles 8 and 9 of the Law:

- Audit Firms
- Clients
- Collaborating Companies
- Consultants
- Judicial Authorities and Public Authorities
- Logo Group Companies
- Resellers
- Service Providing Companies
- Shareholders
- Suppliers
- Teknopark Management (Managing Company)

- Banks and Financial Institutions
- Central Registry Agency Inc., Public Disclosure Platform, Borsa İstanbul A.Ş., Depository Institutions, Capital Markets Board

12. CONFIDENTIALITY AND SECURITY OF PERSONAL DATA

Logo Group Companies attach importance to privacy and security of Personal Data and take the legal, technical and administrative measures stipulated by the Law and other applicable legislation for protection of Personal Data.

12.1. Reasons for Retention and Disposal of Personal Data

12.1.1. Legal, Technical and Other Reasons for Retention of Personal Data

In the event the primary purpose of collection of Personal Data or, if any, the grounds for secondary processing specified under this Policy is no longer valid, Logo Group Companies;

- shall retain Personal Data in accordance with the limits specified and/or periods stipulated under the laws for the purpose of performing Logo Group Companies' current or future obligations,
- shall retain Personal Data which needs to be erased and/or anonymized, in non-accessible ("nonliving") form in backups/archives and similar mediums for the purpose of business continuity, data protection and prevention of data loss,
- shall retain Personal Data which shall be disposed of by means of erasure, destruction or anonymization, until the following periodic disposal date at the latest.

12.1.2. Legal, Technical and Other Reasons for Disposal of Personal Data

- If the purposes requiring processing and the reasons requiring retention of Personal Data no longer exist,
- If the Data Subject withdraws of his/her consent, where Personal Data processing is subject to the condition of explicit consent,
- If the Data Subject requests disposal of his/her Personal Data within the scope of his/her rights under Article 11 of the Law and article 16 of this Policy and such application is accepted by Logo Group Companies or is rejected by Logo Group Companies but approved by the Board following filing of a complaint to the Board,
- If the maximum period for retention of Personal Data is over and there are no conditions that could justify the retention of personal data longer.

12.2. Measures towards Secure Retention of Personal Data and Prevention of Unlawful Processing of and Access

12.2.1. Technical Measures

- Personal Data access authorizations are restricted, determined, checked periodically and access logs are kept,
- Records of all transactions on Personal Data are safely recorded,

- Data recording mediums are protected with various software/hardware, including but not limited to virus protection software, encryption and physical measures in order to prevent any unlawful access to Personal Data within or outside the company.
- Necessary audits are conducted or commissioned in order to ensure processing of Personal Data in compliance with the procedures and principles set forth under the Law,
- Data recording mediums under the responsibility of Logo Group Companies undergo security tests conducted by professional organizations on a regular basis, test results are recorded and any security flaw discovered is fixed.

12.2.2. Administrative Measures

- A Personal Data Protection Committee has been established and kept functioning,
- Employees are trained and informed on protection and lawful processing of Personal Data based on the Law and other applicable legislation and any amendments on legal these regulations,
- Data processed is sorted on a unit basis, awareness and processing activities specific to business units are conducted,
- Audits are conducted within the company on a regular basis,
- In the contracts to be executed with employees and third parties; purposes, scope and periods for processing of Personal Data are specified, responsibilities of the parties are explicitly stipulated and provisions imposing sanctions against processing activities violating the law and the contract provisions as well as the provisions ensuring privacy of Personal Data are included.

12.3. Measures towards Lawful Disposal of Personal Data

12.3.1. Technical Measures

- Disposal process is carried out by or under the supervision of technical personnel well-informed on the subject.

12.3.2. Administrative Measures

- A Personal Data Protection Committee has been established and kept functioning,
- Employees are trained and informed on periodical and proper disposal of Personal Data,
- Audits are conducted within the company on a regular basis,
- The contracts to be executed with employees and third parties contain provisions imposing sanctions against not disposing Personal Data in accordance with the Law and other applicable legislation.

12.4. Personal Data Protection Committee

A “Personal Data Protection Committee” has been established within the structure of Logo Group Companies for the purpose of conducting Personal Data retention and disposal processes and taking necessary actions in accordance with this Policy. The primary duties of the committee are as follows:

- To prepare and implement the policies on protection, retention, processing and disposal of Personal Data or have these policies prepared,
- To conduct or commission in-company audits to ensure compliance of Personal Data protection, retention, processing and disposal processes with the Law and the Policy, to ensure that necessary measures are taken to remedy any deficiency or risk detected in this respect,
- To inform employees, to organize training sessions when deemed necessary or facilitating employees' attendance to training sessions organized by third parties, for the purpose of lawful processing and disposal of Personal Data and prevention of unlawful access,
- To evaluate Data Subjects' applications, to ensure coordination within the company to respond to applications and to ensure delivery of the response to the Data Subject within the legal period,
- To follow the amendments in Personal Data legislation in person or through Consultants or Service Providing Firms, to ensure that organizational actions are taken for compliance to new regulations,
- To facilitate the necessary coordination and communication with the Board when required.
- In case the company is obliged to register to the registry (Data Controllers Registry), to conduct registration procedures and process through one or more authorized person from the Committee or are appointed separately.

12.5. Products and Services Provided by Third Party Institutions

Products and services provided and the Website and Applications owned by Logo Group Companies may contain or may provide link to; websites, products and services by third parties, which are not owned and operation of which are not controlled by Logo Group Companies. Your Personal Data may be transferred to third parties when using these websites, products and services. Logo Group Companies do not assume any kind of warranty or specific liability with respect to content, fitness, security, privacy policies of these websites, products and services or uninterrupted communication. Privacy and security terms of these firms must be read prior to any action.

13. DISPOSAL OF PERSONAL DATA

Despite being processed under the provisions of the Law and other applicable laws, Personal Data shall be erased, destroyed or anonymized by Logo Group Companies, ex officio or upon request of the Data Subject, upon disappearance of all reasons which require processing and retention of Personal Data.

13.1. Erasure of Personal Data

Erasure of Personal Data is the operation of rendering Personal Data inaccessible and non-reusable in any way for the relevant users.

Logo Group Companies may use the following methods to erase Personal Data depending on the medium data is recorded:

- Delete Command

- Blacking out
- Canceling the Relevant User's Access Right on the Directory of the File
- Deleting with Software
- Deleting with Database Command

13.2. Destruction of Personal Data

Destruction of Personal Data is the operation of rendering Personal Data inaccessible, irrecoverable and non-reusable in any way by anyone.

Logo Group Companies may use one or more of the following methods to destroy Personal Data depending on the medium data is recorded:

- Degaussing
- Physical destruction
- Overwriting
- Destruction with "Block Erase" Command
- Destruction with a Paper Shredder
- Destruction of All Copies of Encryption Keys

13.3. Anonymization of Personal Data

Anonymization of Personal Data means rendering personal data impossible to link with an identified or identifiable natural person, even through matching them with other data.

In order for Personal Data to be deemed anonymized; Personal Data must be rendered impossible to link with an identified or identifiable natural person even through use of appropriate techniques for recording mediums and the relevant field of activity, such as de-anonymization and matching them with other data by Logo Group Companies, third party or parties to whom Personal Data has been transferred.

Logo Group Companies may use one or more of the following methods to anonymize Personal Data:

- Removing Variables
- Removing Recordings
- Top and Bottom Limit Coding
- Local Suppression
- Sampling
- Micro-aggregation
- Data Swapping
- Noise Addition
- K-Anonymity
- L-Diversity
- T- Closeness

14. PERSONAL DATA RETENTION AND DISPOSAL PERIODS

Logo Group Companies retain Personal Data for the period of time necessary for the purpose of processing. In the event the primary purpose of collection of Personal Data or, if any, the grounds for secondary processing specified under this Policy is no longer valid, Personal Data may be retained for the periods set forth under article 12.1.1 of this Policy.

In case of an obligation to erase, destroy or anonymize Personal Data at the end of these periods, Logo Group Companies shall erase, destroy or anonymize Personal Data in the first following periodic disposal process.

15. PERIODIC DATA DISPOSAL PERIODS AT LOGO GROUP COMPANIES

Periodical data disposal period at Logo Group Companies is 6 months. Where unrecoverable or irreparable consequences may arise and such actions are unambiguously contrary to law, the Board may shorten this period.

16. RIGHTS OF THE DATA SUBJECT AND PROCEDURES FOR EXERCISING THESE RIGHTS

16.1. Rights of the Data Subject

Pursuant to Article 11 of the Law, the Data Subject has the right to apply to Logo Group Companies and;

- to learn whether his/her Personal Data is processed,
- to request information if his/her Personal Data is processed
- to learn the purpose of processing of his/her Personal Data and whether such data is used for intended purposes,
- to know the third parties to whom his/her Personal Data is transferred at home or abroad,
- to request rectification of the incomplete or inaccurate data, if any, and to request notification of such operation to third parties to whom Personal Data has been transferred,
- to request erasure or destruction of Personal Data upon disappearance of all reasons which require processing of Personal Data, despite being processed under the provisions of the Law and other applicable laws, and to request notification of such operation to third parties to whom Personal Data has been transferred,
- to object analyzing of his/her Personal Data exclusively by automatic means which leading to an unfavorable consequence for himself/herself,
- to claim compensation for the damage arising from the unlawful processing of his/her Personal Data.

16.2. Cases Where the Law Shall Not Be Applied and the Data Subject Shall Not Exercise His/Her Rights

Pursuant to subparagraph 1 under Article 28 of the Law, the provisions of the Law shall not be applied in the following cases where:

- Personal Data is processed by natural persons within the scope of purely personal activities of the data subject or of family members residing in the same household, provided that it is not disclosed to third parties and the obligations about data security are complied with,

- Personal Data is processed for official statistics and for research, planning and statistical purposes after being anonymized,
- Personal Data is processed for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that such processing does not constitute a crime or violate national defense, national security, public security, public order, economic security, right to privacy or personal rights,
- Personal Data is processed within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations duly authorized and assigned by law to maintain national defense, national security, public security, public order or economic security,
- Personal Data is processed by judicial authorities or execution authorities with regard to investigation, prosecution, criminal proceedings or execution proceedings,

Pursuant to subparagraph 2 under Article 28 of the Law, the Data Subject shall not exercise the rights set forth under article 14.1 of this Policy, excluding the right to demand compensation, in the following cases where:

- Processing of Personal Data is necessary for prevention of a criminal act or crime investigation.
- Processing is carried out on the Personal Data which disclosed to public by the Data Subject himself.
- Processing of Personal Data is necessary for inspection or regulatory duties and disciplinary investigation or prosecution carried out by public institutions and organizations and by professional associations with public institution status, assigned and authorized by the law.
- Processing of Personal Data is necessary for protection of the State's economic and financial interests with regard to budgetary, tax-related and financial issues.

16.3. Procedures for Exercising the Rights of the Data Subject

The Data Subject may send his requests within the scope of the rights set forth in article 16.1 of this Policy in written or through registered e-mail (KEP), secure electronic signature, mobile signature, or an e-mail address that was previously notified to and registered in the system of Logo Group Companies.

In case of written application, Data Subject may exercise his right by filling in Turkish and signing the application form provided in Annex-1 and by sending the original form to the address **“Gebze Organize Sanayi Bölgesi, Şahabettin Bilgisu Cad. No:609 Gebze/Kocaeli”** through a notary public's office or delivering it himself or having it delivered by his/her proxy to the same address.

In case of applications through other ways specified above (electronically), the application form provided in Annex-1 should be filled in Turkish and send to relevant Logo Group Company via e-mail and/or registered e-mail address which are mentioned on relevant company's website. It is mandatory to submit the documents authenticating the Data Subject's identity, the documents supporting the

request, if any, and if the Data Subject wishes to exercise such right through proxy, the copy of the proxy document including specific authorization, to Logo Group Companies along with the form.

16.4. Responding to Data Subject's Application

Requests submitted with a form shall be responded free of charge within the shortest time possible depending on the nature of the request and within thirty days at the latest. However, in the event the procedure requires any additional costs, a fee may be charged based on the tariff determined by the Board.

In the course of an application; in the event of sharing incomplete or inaccurate information, failure to express the request clearly, lack of or improper submission of support documents, failure to attach a copy of the proxy document for applications through proxy, Logo Group Companies may encounter difficulties meeting the requests which may result in delays in the investigation process. Therefore, while exercising the rights under Article 11 of the Law, it is important to comply with the foregoing. In such cases, Logo Group Companies shall not be held responsible for any delays.

All legal rights of Logo Group Companies are reserved in case of any incorrect, contrary to facts/law and malicious applications.

16.5. Data Subject's Right of Complaint to the Board

In the event application is rejected, the response is found unsatisfactory or the response is not given in due time, Data Subject has the right to file a complaint to the Board within thirty days commencing on the date of receiving the response of Logo Group Companies, and within sixty days as of the application date, in any case.

ANNEX-1 APPLICATION FORM

This form has been drafted for convenience purposes while exercising your right to be informed by applying to Logo Group Companies in accordance with Article 11 of the Law on Protection of Personal Data. For further information on processing of your Personal Data and the post-application process, please refer to the “Logo Group Companies Policy on Protection, Processing, Retention and Disposal of Personal Data (“Policy”) published on www.logo.com.tr website.

A. Contact Details of the Applicant

Information requested on this form is required for authenticating your identity, conducting thorough investigation regarding your request and submitting the result of your application to you ("Purpose") and may be processed for this Purpose. Therefore, please make sure that the information you provide is accurate and complete. Your Personal Data requested shall not be used in any way other than to fulfill the Purpose.

Name-Surname:	
ID/Passport Number:	
Phone Number:	
E-mail Address:	
Address (Home/Work):	

B. Applicant's Relation to Logo Group Companies

1. Please indicate your relation to Logo Group Companies.

For example: Employee; Shareholder; Company Executive; Client; Client Executive/Employee; Reseller.

.....

2. Which Logo Group Company or Companies are you related with?

.....

3. Which unit within Logo Group Companies have you contacted?

.....

C. Applicant's Request

Please explain your request in detail.

.....

.....

.....

.....

.....

.....

.....

.....

.....

D. Delivery Method of the Responses to Applications

The response to your application may be sent through electronic mail to your e-mail address or as certified mail or through a notary public's office to your address stated above.

E. Annexes

- The documents supporting your request, if any, must be attached to the form.
- For individual applications, please attach a copy/photocopy of the documents authenticating your identity (identity card, driving license, passport etc.)
- For applications through proxy, it is mandatory to submit a copy of the proxy document including specific authorization, to Logo Group Companies along with the form.

In accordance with the abovementioned requests, I kindly request my application to Logo Group Companies to be evaluated and responded in accordance with Article 13 of the Law.

Applicant's (Data Subject/Proxy)

Name-Surname:

Date of Application:

Signature:

VERSION HISTORY

Version Number	Updating Date	Comments
1	29.12.2017	First publish
2	2021	• Uptade of the definition of Logo Group Companies • Uptade of the article (3), (12.2.1), (12.4) and (16.3).