

## **Personal Data Protection Policy**

As KALE HOLDİNG A.Ş. (hereinafter referred to as “KALE”), we have adopted it as a principle to protect all personal data of natural persons that we access or acquire in any manner whatsoever and to strictly fulfil the relevant requirements within the framework of the Law and the relevant legislation. This Informative Text has been prepared to inform the users of our website at [www.kalegrubu.com.tr](http://www.kalegrubu.com.tr) about the processes regarding the recording, processing, sharing, transfer to third parties, storage, deletion, destruction, and anonymization of personal data collected through our website as well as our principles regarding such processes.

As the data controller, **KALE** has undertaken the responsibility to establish the necessary organization and to take and adapt technical measures for protection of the privacy and integrity of the information pursuant to the provisions of the relevant applicable legislation in force.

**KALE** takes necessary measures for protection of personal data against unauthorized access or loss or misuse, disclosure, alteration or destruction of such data.

**KALE** informs the users without delay as soon as it notices any breach in relation thereof, allows for the legal follow-up of such breaches in accordance with the laws and ensures the security of data using its best endeavours to that effect.

### **1. Definition of Personal Data**

The term “Personal Information/Personal Data” as used in this Personal Data Protection Policy means the information that may be associated with an identified or identifiable natural person such as name, surname, date and place of birth, telephone number, motor vehicle license plate, social security number, passport number, curriculum vitae, picture, image and voice records, fingerprints, e-mail addresses, etc.

### **2. Legal Basis for Collection of Personal Data**

There are regulations set forth in various laws with respect to the use of users’ personal data. The principles regarding protection of personal data are specified, principally, in article 20 of the Constitution, the Law no. 5651 on Regulating Broadcasting in the Internet and Fighting Against Crimes committed through Internet Broadcasting, the Law no. 6698 on Protection of Personal Data and the relevant legislation.

### **3. Methods for Collection of Personal Data**

We store the data such as user name, password, e-mail, date of birth, gender and similar data directly shared while using the accounts at [www.kalegrubu.com.tr](http://www.kalegrubu.com.tr) as well other data related with the login to the website such as automatically obtained and viewed pages, visit times, etc.; the information obtained through cookies, location data, and the data such as browser type and language, device model, etc. for the necessary period for provision of our products and services. As the hosting provider, we store the IP data automatically collected while the users use their accounts at [www.kalegrubu.com.tr](http://www.kalegrubu.com.tr) for the necessary legal period pursuant to our legal obligations.

In addition, we store the data related with the login to the website such as automatically viewed pages and visit times in cases where the website is visited or used without an account at [www.kalegrubu.com.tr](http://www.kalegrubu.com.tr) or without any login to the registered account at [www.kalegrubu.com.tr](http://www.kalegrubu.com.tr), as well as the IP data, the information obtained through cookies, location data, and the data such as browser type and language, device model, etc. on an anonymous basis for the necessary period in order to ensure the provision of our products and services.

Cookies that you allow may be placed in your browser during your visit at [www.kalegrubu.com.tr](http://www.kalegrubu.com.tr). For further information, please visit our cookies policy provided at [www.kalegrubu.com.tr/tr/Uploads/cerezpolitikasi](http://www.kalegrubu.com.tr/tr/Uploads/cerezpolitikasi).

### **4. Areas in which Personal Data are used**

Personal Data shall be used for the following purposes; and under no circumstances may such personal data be used for any purposes other than those related with the collection of such data and as specified in the informative text related with the channel through which such data are collected.

### **5. Sharing of Personal Data**

The Personal Data obtained or collected through the website of [www.kalegrubu.com.tr](http://www.kalegrubu.com.tr) are collected for the purpose of the service provided; and in principle, they are not sold or leased to or otherwise made available for use by or shared with any third persons under any circumstances.

However, KALE may share such data with its suppliers, employees, advisors, business partners or the related 3<sup>rd</sup> Persons where necessary or required for provision of relevant services and conducting the commercial activities by

taking necessary measures and to the extent allowed by the relevant legislation. These related 3<sup>rd</sup> persons as mentioned herein may include natural or legal persons resident abroad within the framework of the relevant legislation.

In addition, KALE may share the information held in the possession of any user/s with the relevant competent authorities in cases where it duly receives requests for disclosure of such data from the authorized administrative and governmental authorities pursuant to the applicable legislation in force.

## **6. Users' rights under the Law on Protection of Personal Data:**

We would like to remind you that, pursuant to Law on Protection of Personal Data (KVKK), you have and are entitled to exercise the following rights:

- to learn whether your personal data are processed or not;
- if your personal data are processed, to request information regarding such processing;
- to learn the purpose of processing of your personal data and whether your data have been used for intended purposes;
- to know the third persons/parties to whom your personal data are transferred at home or abroad;
- to request for correction of your personal data if they have been processed incompletely/inaccurately;
- to request for erasure/deletion or destruction of your personal data within the framework of the conditions stipulated in article 7 of the Law on Protection of Personal Data;
- to request for notification of such actions taken pursuant to subparagraphs (d) and (e) above to the third parties to whom your personal data have been transferred;
- to object to the analysis of your personal data processed exclusively by automated means or systems, which leads to an unfavourable consequence for you;
- to request for compensation of any loss or damage that you have incurred due to the unlawful processing of your data in breach of the Law on Protection of Personal Data.

## **7. Your Consent to the Recording and Storage of Your Personal Data**

Starting from the moment you start to use our website at [www.kalegrubu.com.tr](http://www.kalegrubu.com.tr), you agree and consent that we can use all information collected from you through the methods and for the reasons specified above as described in this policy. You completely provide us with the data collected for

the aforementioned purposes on your own free will. Users are free to provide or not to provide these Personal Data to us.

## **8. Updating/Revision of the Policy**

We may review, amend or revise our policy and the ways and methods we process personal data from time to time. We will publish the Revised Policy on our website at [www.kalegrubu.com.tr](http://www.kalegrubu.com.tr). The revised terms and conditions shall become effective as of the date they are published.

The Data Controller Representative that will be appointed by our Company shall be registered in the Registry of Data Controllers and announced on the website containing such document when the legal infrastructure is duly established. Personal Data Owners/Subjects should submit their questions, opinions, or requests in writing, by delivering them in person or sending them via registered and reply-paid letter, or electronically to the e-mail address of [kholkvkk@kale.com.tr](mailto:kholkvkk@kale.com.tr) or by sending a registered e-mail to the company's KEP (registered e-mail) address of [kaleholding@hs01.kep.tr](mailto:kaleholding@hs01.kep.tr). In such cases, a written response shall be provided within 30 days.

**KALE HOLDİNG A.Ş.**

**Last Updated: 29/11/2019**