

TOYA LAW FIRM

CLARIFICATION TEXT ON THE PERSONAL DATA PROCESSING (“CLARIFICATION TEXT”)

This Clarification Text has been prepared by Toya Law Firm (“**Toya**”) in order to process the personal data of website visitors (“**Data Owner**”) in accordance with the relevant legislation, especially the Constitution of the Republic of Turkey, international conventions on human rights to which our country is a party, the Law on the Protection of Personal Data No. 6698 (“**LPPD**”) and the General Data Protection Regulation (“**GDPR**”) and decisions of the Personal Data Protection Board and to enable Data Owners to exercise their rights effectively.

Definitions

The definitions of personal data and data processing concepts used in this Clarification Text are given below.

- **Personal data:** It refers to any information relating to an identified or identifiable natural person.
- **Processing of personal data:** It refers obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classification of personal data by fully or partially automatic or non-automatic means provided that it is a part of any data recording system or all kinds of operations performed on the data, such as preventing its use or use.
- **Data Controller and Representative:** Pursuant to LPPD, as Toya Law Firm, in the capacity of data controller, your personal data within the scope of the purposes explained below; we will be able to process, save, store, classify, update and disclose/transfer to third parties in cases permitted by the legislation and/or limited to the purpose for which they are processed, in accordance with the law and good faith.

Purposes of Processing Your Personal Data

Your personal data will be processed within the framework of the procedures and principles stipulated in the relevant legislation for the purposes stated below and in accordance with the processing conditions of personal data regulated in Article 5 of the LPPD.

- Execution of activities in accordance with the legislation,
- Ensuring the security of the visited website,
- Communication with Data Owners,
- Making the necessary notifications to the relevant institutions, if requested by the authorized official institutions or organizations in accordance with the law.

Your Personal Data We Process

Within the scope of the above-mentioned purposes, personal data provided to us by the data owners may be processed by us. As an example, your personal data that may be subject to processing are as follows:

| | |
|---------------------------|--|
| Identity Data Name | Name, surname |
| Contact Data | Phone number, email address, contact information |
| Marketing Data | Survey, cookie records, data obtained through survey study |

Purposes of Transfer of Your Personal Data

Your personal data may be transferred to our business partners, shareholders, affiliates, authorized public institutions and organizations, private individuals, companies that receive support services in order to carry out our activities, and independent audit companies within the framework of legal obligations and legal restrictions within the scope of the purposes and legal reasons stated in this Clarification Text, with our suppliers, authorized institutions organizations, and to Toya Law Firm's servers located abroad, which are used within the framework of the commercial and operational activities of Toya Law Firm, with the conditions specified in the Law within the rules regarding the transfer of personal data specified in Articles 8 and 9 of the Law on the Protection of Personal Data, limited to the above-mentioned purposes.

After the declaration of foreign countries with sufficient protection to be determined by the Personal Data Protection Board ("**Board**"), only persons and organizations residing in these countries, for countries where it is determined and declared that there is no adequate protection, it can be transferred only to the cases where the data controllers in Turkey and in the relevant foreign country undertake an adequate protection in writing and the permission of the Board can be obtained in terms of the relevant transfer by obtaining explicit consent in the light of the principles stipulated in Article 4/f.2 of the LPPD, or in case of the existence of the situations stipulated in Articles 5/f.2 and 6/f.3, without obtaining explicit consent and in accordance with the rules in Article 9 of the Law.

Collection Method of Your Personal Data

Your personal data is obtained through your IP address during your visit to our website, the hours you visit our website, and the form filled in by you on our website.

Legal Reason for Processing Your Personal Data

Your personal data in question, in accordance with the data processing conditions specified in Articles 5 and 6 of the Law, while processing the personal data of the signatories of the business partners, based on the legal reason for the establishment and performance of the contract, in other cases, the legal obligation of the data controller, the establishment, exercise or protection of a right,

and the fact that data processing is necessary for the legitimate interests of the data controller are processed based on legal reasons. However, in the absence of at least one of the legal reasons in the data processing activity, the explicit consent of the data subject is asked and if you give your consent, personal data is processed based on this legal reason.

Retention Period of Your Personal Data

The personal data you have shared with Toya Law Firm through the channels mentioned in this Clarification Text will be processed in accordance with the periods mandated in all relevant legislation, especially the LPPD, unless the above legitimate purposes are eliminated in any case.

Exercise of Related Person Rights

We declare that you, as the data owner, have the following rights in accordance with Article 11 of the Law:

- Learning whether your personal data is processed,
- If your personal data has been processed, requesting information about it,
- To learn the purpose of processing your personal data and whether they are used in accordance with the purpose,
- Knowing the third parties to whom your personal data is transferred, in the country or abroad,
- Requesting correction of your personal data in case of incomplete or incorrect processing and requesting notification of the transaction made within this scope to the third parties to whom your personal data has been transferred,
- Requesting the deletion or destruction of personal data in the event that the reasons requiring it to be processed disappear even though it has been processed in accordance with the Law and other relevant law provisions, and requesting the notification of the transaction made within this scope to the third parties to whom your personal data has been transferred,
- Objecting to a result against you by analyzing the processed data exclusively through automated systems,
- Requesting the compensation of the damage in case you suffer damage due to unlawful processing of your personal data.

You can forward your applications regarding your rights listed above and requests for updating your personal data to Toya Law Firm via the e-mail address info@toyalaw.com using your e-mail address registered in our systems. You can also choose other methods specified in the Communiqué on Application Procedures and Principles to the Data Controller. Depending on the nature of your request, it will be finalized as soon as possible and within thirty days at the latest.

