

DISCLOSURE LETTER ON PROCESSING AND PROTECTION OF PERSONAL DATA

The purpose of this disclosure letter is to inform you, pursuant to article 10 of the Personal Data Protection Law numbered 6698 (“PDPL”), on the collection and processing of personal data, method and purpose of processing activities and legal grounds of transfer thereof, to whom and for which reasons personal data may be transferred and on your rights under the Law.

1. Purpose of, and Legal Grounds for, Processing of Your Personal Data

Personal data (ID, contact information, customer transaction information and, when necessary, information on family and profession, visual and audio records, financial information, education status, records of legal transactions) and sensitive personal data (health information, disability status, information on religion and criminal conviction) are rendering insurance services, conduct of policy, risk and offer works, calculation of statistics and probabilities, determination of policy details, premiums and coverages, payment of premiums, processes of collection and payment of service fees, provision and maintenance of the services provided by support service providers to the insured and beneficiaries, especially the Exercise of rights and fulfillment of obligations arising from the policy, performance of policy addendum, cancellation and renewal procedures, execution of claim investigation, evaluation, payment and subrogation processes, provision of provision, health screening and second opinion services, conduct of product development works, conduct of reinsurance processes execution of reinsurance processes, increasing service quality, execution and follow-up of legal transactions, satisfaction of obligations and legal notifications arising from legislation, determination of the information of the person who made/performed the transaction, provision of product and services to you in the most appropriate manner, ensuring continuity of marketing and technical processes, conduct of works to ensure commercial safety of our Company, preparation of all records and documents in electronic (internet/mobile, etc.) or physical media forming the basis of the transaction, compliance with the information storage, reporting and notification obligations stipulated under the legislation and by other relevant authorities, processed for the purposes of planning and execution processes for compliance with audit obligations, data analysis studies, informing our customers about the services offered to our customers by the companies we receive services from, insurance intermediaries and business partners, advertising and promotion of insurance products, execution of financial and accounting transactions, fulfillment of the reporting obligations of our Company and the group we are affiliated with, and stored securely in physical or electronic media for a duration in line with the purpose of processing.

Gulf Sigorta processes your data based on the legal grounds set forth in articles 5 and 6 of the Personal Data Protection Law such as:

- Being explicitly foreseen under the laws,
- Being required for fulfillment of legal obligations,
- Processing being directly related to, and required for, the formation or performance of an agreement,
- Processing being required for legitimate interests,
- Having being made public by you,
- Processing being required for the establishment, exercise or protection of a right,
- Your explicit consent having been obtained
- Being required for the protection of the life or bodily integrity of a person, who is unable to express his/her consent due to physical impossibility or whose consent is not legally recognized, or that of another person,

- Processing within the scope of a confidentiality obligation.

2. Method of Collection of Personal Data

Personal data is procured, processed and updated,

- via the channels such as head office, regional offices, branch, insurance intermediaries, enterprises providing goods and services, internal and external call centers, support service providers, other private legal entities,
- via SSI, Ministry of Health, medical institutions and establishments and regulatory authorities, courts, professional organizations with public institution status and parent organizations thereof, information centers established by law, registries
- in case data subjects apply to Gulf Sigorta, via various channels and convey personal data, from data subjects or authorized representatives thereof,
- via communication and inquiry channel on the website, cookies used on the website (for detailed explanation, refer to our cookie policy) and other digital channels,
- in cases where Gulf Sigorta applications are signed up with and used,
- within the scope of camera recordings and creating visitor logs,
- in cases where data subjects disclose their personal data, by other means,

in line with the fundamental principles stipulated under PDPL and within the scope of the Turkish Commercial Code, Insurance Law and other relevant legislation verbally, in writing or electronic media, by wholly or partially automated means or, as part of a data filing system, by non-automated means.

3. Transfer of Personal Data

Your personal data may be shared, for the conducting of the insurance activities, issuance of your insurance policy, preparation of offers suitable to you or conduct of technical or organizational activities supporting the insurance policy, collection, payment, reinsurance and subrogation processes, provision of services as required by the policy, fulfillment of claim investigation, assessment and payment processes, fulfillment of legal obligations, in line with the fulfillment of regulatory obligations, customer and service provider recognition processes, regulatory and reporting requirements of the group we are affiliated with, legal and administrative follow-up processes; with Gulf Sigorta Regional Managements, companies providing reinsurance and, for these purposes, with brokers, health institutions and organizations, physicians and similar medical specialists and medical consultants under the obligation of confidentiality, actuaries, loss adjusters, insurance intermediaries, actuaries, experts, insurance intermediaries, and other insurance companies in terms of subrogation procedures, in terms of the insured who are employees of corporate clients, if so requested by the policyholder, with Human Resources and/or relevant department of the policyholder, with real persons and legal entities acting as representatives for the settlement of legal disputes, with all persons and institutions which are permitted by national/international legislation or all persons and institutions whose under such legislation or agreements whose party to, permitted, entitled and authorized to request and process personal data, with judicial and administrative authorities, with institutions authorized to audit or supervise, with establishments cited under article 31/A of the Insurance Law, with professional organizations, business partners and, from time to time, other third persons and establishments in order to increase the quality of the service provided and ensure integrity of the service, and with group companies and support service providers for the purpose of reporting requirements and identifying the customers and service providers, to the extent and under the conditions permitted and required by the legislation domestically and/or overseas.

In addition to those specified above, personal data may be processed in order to contact you for the provision of all products and services specific to you in relation to the product and service received/to be received by you in this matter, and, additionally, to be used for promotion, offer of product/service, marketing and special offer activities and to develop services and products suitable to you, to conduct customer satisfaction studies and for current or new product studies, market research and determination of target customer group.

4. Rights of Data Subjects

You may convey to us the demands under article 11 of the PDPL titled “Rights of the Data Subject” pursuant to the principles specified in “Gulf Sigorta Anonim Şirketi Data Subject Application Form” in the “Legal Practices” section at www.gulfsigorta.com.tr.

Pursuant to article 4 of the Law, Gulf Sigorta is obliged to keep personal data accurate and up-to-date. In this context, for our Company to be able to fulfill our obligations arising from the legislation in force, you have to share accurate and up-to-date data with our Company. In case of any change in your data, we kindly request that you contact us via the communication channels specified below and update your data.

HEAD OFFICE	
Commercial Title	Gulf Sigorta A.Ş.
Headquarters	İnkılap Mah. Dr. Adnan Büyükdeniz Cad. 2.Blok No:4 Daire:10,11,12 Ümraniye / İSTANBUL
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For more information, please refer to the Policy on Protection and Processing of Personal Data at www.gulfsigorta.com.tr