

GIG SİGORTA ANONİM SİRKETİ
Policy of Collection and Process of Personal Data

1. Introduction

Everybody has the right of claim for protection of their own personal data according to Article 20 of Turkish Republic Constitution. This right covers information about, access and claim for correction or deletion of them and also acknowledge if they use or not in accordance with their purpose.

Protection of fundamental rights and freedoms of individuals in the process of personal data and liabilities of individuals and legal entities processing personal data and rules and procedures they are obliged to abide are regulated by the Data Protection Law no. 6698 (“the Law”). The purpose of this policy is to agree with liabilities of regulations of The Law

In case of any conflict between the Law, related legislation and this Policy, current legislation shall prevail.

2. Purpose

Policy of Protection and Process of Personal Data (“**Policy**”) of GIG Sigorta Anonim Şirketi (“**Company**”) has been prepared for the purpose of right to privacy, notably, protection of fundamental rights and freedoms of individuals and regulate liabilities of individuals and legal entities processing personal data and rules and procedures they are obliged to comply with.

By this policy, it has been adopted to maintain and improve on actions taking by Company in compliance with the principles stated in the Law.

3. Scope

Data owners whom their personal data has been being processed have been categorized stated herein within the scope of this Policy:

Customers	Natural persons such as insured, policyholder, beneficiary whose personal data are obtained due to business relations within the scope of the activities carried out by our Company.
Third Persons	Other natural persons, including but not limited to suppliers, agents, candidate agents, brokers, business partners, support service providers, visitors, interns, etc., whose personal data are processed under this Policy.

4. Definitions

Definitions used in this Policy are stated herein under:

Explicit Consent	Freely given specific and informed consent;
Anonymization	Rendering personal data by no means identified or identifiable with a natural person even by linking with other data;
Personal Health Data	Any information related to physical and psychological health of identified or identifiable natural person and health services presented this person.
Personal Data	Any information relating to an identified or identifiable natural person
Processing of Personal Data	Any operation which is performed upon personal data such as collection, recording, storage, preservation, alteration, adaptation, disclosure, transfer and retrieval making available for collection, categorization or blocking its use by wholly or partly automatic means or otherwise than by automatic means which form part of a filing system
KVKK	Data Protection Law
The KVK Board	The Board of Protection of Personal Data
SEDDK	Turkish Insurance And Private Pension Regulation And Supervision Authority
The TCC	Turkish Criminal Code

The Authority	The Authority of Protection of Personal Data
¹Sensitive Personal Data	Race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, costume, association, membership of foundation or union, health, sexual health, criminal conviction, security measures data of persons and data of biometric and genetics
Data Processor	Natural or legal person who processes personal data based on the authority granted by and on behalf of the data controller
Data Owner	Natural person who is deemed “relevant person” in Code of Protection of Personal Data and their personal data is processed
Application form for Data Owner	Application form which personal data owners whom their personal data in Company is processed will benefit during use of application regarding their rights explained in Article 11 of Data Protection Law
Data Controller	Natural or legal person who determines the purposes and means of the processing of personal data, and who is responsible for establishment and management of the filing system.
Data Controller Registry	Data controller register recorded Presidency under supervision of The Board of Protection of Personal Data
Data Inventory	Inventory which is formed and detailed by Company associating with purposes of personal data process, receiver group which personal data is transferred to and related personal data owner group with personal data processing actions which has being developed depending on work process.

5. General Principles for Processing of Personal Data

Pursuant to Article 3 of the Code, any operation which is performed upon personal data such as collection, recording, storage, preservation, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization or blocking its use by wholly or partly automatic means or otherwise than by automatic means which form part of a filing system falls within the scope of processing of personal data.

The below principles shall be complied with when processing personal data: a)

Being in conformity with law and good faith;

Our company carries on personal data processing activities in accordance with law and good faith and compliance with firstly Turkish Republic Constitution, the Law and related legislation.

b) Being accurate and if necessary, up to date;

During the activities of processing of personal data, any administrative and technical measurements oriented to ensure accuracy and up to dated of personal data are taken by our company.

c) Being processed for specified, explicit, and legitimate purposes;

Our company clearly and definitely determines purpose of personal data processing before starting personal data processing activity.

d) Being relevant, limited and proportionate to the purposes for which data are processed; Personal data is being processed proportionately by our Company. It has not been carried personal data processing with assumption for future use.

- e) Being stored only for the time designated by relevant legislation or necessitated by the purpose for which data are collected.

Our company stores personal data only for the time designated by the and relevant legislation or necessitated by the purpose for which data are collected.

6. Conditions for Processing of Personal Data

Our company may process personal data and special categories of personal data obtaining explicit consent of personal data owner or without explicit consent in case of existence of the conditions provided Article 5 and 6 of the Law.

6.1. Process of Personal Data

Our company carries on personal data processing activities in accordance with data processing condition stated in Article 5 of the Code: a) It is expressly permitted by any law.

- b) It is necessary in order to protect the life or physical integrity of the data owner or another person where the data owner is physically or legally incapable of giving consent.
- c) It is necessary to process the personal data of parties of a contract, provided that the processing is directly related to the execution or performance of the contract.
- d) It is necessary for compliance with a legal obligation of our Company.
- e) The relevant information is revealed to the public by personal data owner herself/himself.
- f) It is necessary for the institution, usage, or protection of a right.
- g) It is necessary for the legitimate interests of our company, provided that the fundamental rights and freedoms of the personal data owner are not harmed.

6.2. Conditions for Processing of Special Categories of Personal Data

Our Company carries out its special categories of personal data processing activities in accordance with the data processing conditions set forth in Article 6 of the KVK Law:

- a) Explicitly stipulated in the law,
- b) It is mandatory for the protection of the life or physical integrity of the person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid, himself/herself or of another person,
- c) It is related to the personal data made public by the data subject and is in accordance with the will of the data subject to make it public,
- d) It is mandatory for the establishment, exercise or protection of a right,
- e) It is necessary for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, and the planning, management and financing of health services by persons under the obligation of secrecy or authorized institutions and organizations,
- f) It is mandatory for the fulfillment of legal obligations in employment, occupational health and safety, social security, social services and social assistance,
- g) Current or former members and members of foundations, associations and other non-profit organizations or formations established for political, philosophical, religious or trade union purposes, or persons who are in regular contact with these organizations and formations, provided that they comply with the legislation to which they are subject and their purposes, are limited to their fields of activity and are not disclosed to third parties.

6.3. Categorization relating personal data processed by our Company

All units and employees of our Company actively support the responsible units in taking technical measures to ensure data security in all environments where personal data is processed in order to prevent unlawful processing of personal data, to prevent unlawful access to personal data and to ensure that personal data is stored in accordance with the law, by properly implementing the technical measures taken

by the responsible units within the scope of the Policy, training and raising awareness of the unit employees, monitoring and continuous supervision.

Personal Data Categories processed by Company

Category of Personal Data	Explanation	Personal Data Owner Category relating to relative personal data
Identity Data	Documents like driving license, identity card and passport containing information such as name surname, identity number, tax number, nationality, mother-father name, place of birth, date of birth and gender and signature/ initial and license plate	Customers, third parties
Communication Data	Information like phone number, address, email, facsimile,	Customers,
Agency/Broker/Supplier/ Business Partner Data	Personal data of insurance intermediaries that mediate our Company's insurance activities, companies that provide services based on their contract with our Company, natural person or legal entity employees who provide support services with the implementation of insurance contracts.	Third parties,
Legal Transaction Data	Determination and followings of legal receivables and rights and execution of debts with personal data processed within the scope of our company's integration policies and legal liabilities	Customers, Third parties
Customer Data	Information obtained and produced about the relative person as a result of our business activities and the operations carried out by our business units in this framework	Customers, Third parties
Trainee Data	Personal data (c.v., interview notes, personality test results, etc.) of applicants who have applied for internship or evaluated as candidates for human resource needs in accordance with commercial practice and good faith.	Trainees
Company Data	Data with regard to legal entity of the Company.	Customers, Third parties
Supplier Transaction Data	Necessary data for performing product or service.	Suppliers

Personnel Data	Any personal data processed for the purpose of obtaining information that is essential for creation of personnel rights of personnel or individuals who are in a business relationship with the Company (identity information, job application form, passport photo, education information etc. being in personnel file)	Customers, Third parties, Trainees
Employee, Family and Relatives Data	In order to protect the legal and other interests of personal data owner, information of the family members (e.g. spouse, mother, father, child), relatives and other persons who can be reached in emergency situations (identity information, communication information, professional and educational information of children and spouses of personal data owner)	Customers, Trainees
Employee Performance and Career Development Data	Personal data processed for purpose of planning and carrying out career developments in scope of human resources policy and measuring performance of personnel or individuals working with the Company (performance valuation reports, trainings regarding personnel development etc.)	employees, trainee, third parties

Employee Data	Personal data concerning any kind of actions taken regarding work by personnel or individuals being in business relationship	Agencies, Suppliers, Customers, Trainees
Transaction Security Data	Personal data which is processed to provide our technical, administrative, legal and commercial security while conducting business activities (Information showing that person is authorized and matching that person and the transaction associated with personal data owner (e.g. password information))	Customers, Third parties
Location Data	Information that identifies location of data owner (e.g. such as GPS location that identifies location of our employees while using company cars or GPS information detected when the panic button is pressed)	Customers, Third parties
Employees Data of Enterprises collaborated	Employees of enterprises that are in business relationship with the Company or Customers	Customers, Third parties
Employee Transaction Data	Personal data concerning any kind of actions taken regarding work by personnel or individuals being in business relationship	Customers, Third parties
Sound and Camera Recording Data	Photo and camera recordings (except recordings that fall within the scope of Physical Space Security Information), sound recordings (e.g. telephone conversation sound recording)	Customers, Third parties

Customer Transaction Data	Records such as the use of our products and services, as well as instructions and requests that is necessary for the use of the customer products and services	Customers
Supplier Data	Necessary information for presentation of product or service	Suppliers, Customers
Risk Management Information	Personal data processed by methods in accordance with generally accepted legal and commercial practice and good faith in these fields in order to manage our commercial, technical and administrative risks	Suppliers, Agency
Financial Data	Processed personal data about information, documents and records showing any financial result created in accordance with type of legal relationship established with personal data owner	Customers, Suppliers, Third Persons, Agencies, Brokers and Candidate Agencies
Special Categories of Personal Data	As stated Article 6 of the Code; race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, costume, association, membership of foundation or union, health, sexual health, criminal conviction, security measures data of persons and data of biometric and genetics, blood type, religion of persons	Customer, Trainees, Suppliers
Request/Complaint Management Information	Personal data related to receiving and evaluating any kind request or complaint directed to Company	Customers

7. Ensuring the Security and Privacy of Personal Data

In accordance with Article 12 of the Code, our company takes all kinds of necessary technical and administrative measures to ensure appropriate security level furnishing personal data protection and preventing the illegal access and process of personal data which is being processed by us.

7.1. Technical Measures to Ensure lawful Process of Personal Data and Prevent Unauthorized Access to Personal Data

Ensuring network security and application security, using a closed system network for personal data transfers through the network, implementing key management, taking security measures within the scope of procurement, development and maintenance of information technology systems, keeping access logs regularly, applying data masking measures when necessary, using up-to-date anti-virus systems, using firewalls, The Company has taken all kinds of technical, technological security measures in order to protect your personal data in order to protect your personal data against possible risks, especially issues such as backing up personal data and ensuring the security of backed up personal data, implementing user account management and authorization control system and monitoring them, encryption, using data loss prevention software, creating an authorization matrix for employees, keeping log records in a way that does not allow user intervention, ensuring the security of physical environments containing personal data against external risks (fire, flood, etc.), taking necessary security measures for entry and exit to physical environments containing personal data. The Company has taken all kinds of technical and technological security measures to protect your personal data and has taken your personal data under protection against possible risks, especially in matters such as ensuring the security of physical environments containing personal data against external risks (fire, flood, etc.), taking necessary security measures regarding entry and exit to physical environments containing personal data.

7.2. Administrative Measures to Ensure lawful Process of Personal Data and Prevent Unauthorized Access to Personal Data

- The training and raising awareness of the employees of the company regarding the Code,
- In the case of personal data transfer, to ensure adding a provision regarding fulfillment of data security by the party personal data have been transferred in agreements signed with the individuals to whom personal data transferred.
- The establishment of internal policies for the identification and implementation of the requirements of Protection of Personal Data Code,

7.3. Measures to be taken in case of Disclosure of Personal Data by illegal ways

In case of disclosure of personal data by illegal ways our company will notify data owner and the Board as soon as possible.

8. Purposes for Personal Data Processing and Retention Period

8.1. Purposes for Personal Data Processing

Company collects, processes and transfers personal data belonging to data owner in parallel to related purposes by the purposes stated herein under:

Personal data processed for the purpose of risk assessment, determination of policy premiums and guarantees, creation of insurance offers in case of request and reference to issue an insurance contract, based on the condition that it is necessary to process personal data belonging to the parties to the contract, provided that it is directly related to the establishment and performance of the insurance contract in accordance with subparagraph (c) of paragraph 2 of Article 5 of the Law; Personal data processed for the purpose of reporting to authorized institutions for the performance of obligations arising from laws and relevant legislation, performance of information/document retention obligations, accurate guidance of users, recording of communication, based on the condition that data processing is mandatory for the data controller to fulfill its legal obligation pursuant to subparagraph (ç) of paragraph 2 of Article 5 of the Law; Personal data processed for the purpose of responding to your questions, suggestions, complaints and requests regarding our services and activities, providing information about products, services and campaigns, ensuring customer and agency interactions, improving the services we offer, providing you with the most appropriate service in line with the issues you are interested in, directing surveys in order to evaluate the processes regarding the services and products received, planning and execution of audit activities, data analysis studies, in accordance with Articles 5 and 6 of the Law; provided that it does not harm the fundamental rights and freedoms of the person concerned.

8.2. Storage Period of Personal Data.

Article 3 of the Law defines the concept of processing personal data, Article 4 states that the personal data processed must be linked, limited and measured for the purpose for which they are processed and must be kept for the period stipulated in the relevant legislation or for the purpose for which they are processed, and Articles 5 and 6 list the conditions for processing personal data. Accordingly, within the framework of our Company's activities, personal data are stored for the period stipulated in the relevant legislation or in accordance with our processing purposes. Our company stores personal data only for the time designated by the Code and relevant legislation or necessitated by the purpose for which data are collected.

Our company determines if any storage period provided in related legislation for personal data. If it is provided any period in legislation our company follows it, but if not, it reserves for the necessary period for purpose personal data is processed for. If the purpose of processing personal data is realized and come an end of storage period provided by legal legislation and/or our Company, personal data could be only stored for the purposes of constituting evidence in legal disputes, pledging the related right

attached to personal data or establishing defence. In case of possibility of usage in future, personal data are not be stored by our Company.

9. Deletion, Destruction and Anonymization of Personal Data

Anonymization of personal data means making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even if the personal data is matched with other data. In order for personal data to be anonymized; personal data must be rendered unrelated to an identified or identifiable natural person even by using appropriate techniques in terms of the recording medium and the relevant field of activity, such as the return of personal data by the data controller or third parties and/or matching the data with other data. According to Article 7 of the Law, although personal data are processed in accordance with the relevant legislation, in case of ceasing the reasons personal data processed for, they shall be deleted ex officio or on the personal data holder's request by the Company.

The procedures and principles regarding this matter will be carried out according to the Code and the secondary legislation formed on the basis of the Code.

9.1. Techniques of Personal Data Deleting or Destroying

Physically destruction, securely deletion by expert.

9.2. Techniques of Anonymization of Personal Data

Even if the personal data is matched with other data, it means that the identity can never be associated with a specific or identifiable real person in any way. Example: Masking

Third Parties Personal Data is Transferred and the Purpose of Transfer

The procedures and principles will be applied for the personal data transfer are regulated in Article 8 and Article 9 of the Code and the personal data and personalized personal data of owner could be transferred to third parties in domestic and abroad.

For executing our services Your personal data may processed pursuant to laws and other legislation (including, but not limited to, such as the Banking Act, the Insurance Law, the Tax Procedure Law, the Law on Advocacy Act No. 1136 and other regulations related to the laws, regulations of supervisory and regulatory authority and institutions and the circumstances obliged by public authorities) by Gulf Insurance and may be shared with Gulf Insurance's group companies, third parties serving services to Gulf Insurance, agreed institutions, lawyers for settlement of legal disputes, individuals and legal entities, our business partners and other third parties being in proxy relationship with. However, except in exceptional cases, personal data may not be transferred without the explicit consent of the personal data owner.

10. Third Parties to whom Personal Data is Transferred and Purposes of Transfer

The procedures and principles to be applied in personal data transfers are regulated in Articles 8 and 9 of the KVK Law, and the personal data and sensitive personal data of the personal data owner can be transferred to domestic and foreign third parties. In order to fulfill the services, your personal data may be transferred to third parties in Turkey and abroad in accordance with the Law and other legislation (including but not limited to the Turkish Commercial Code, Insurance Law, Tax Procedure Law, Attorneyship Law No. 1136 and other regulations related to these laws, regulations of supervisory and regulatory institutions and organizations, and cases required by public authorities), It may be processed by our Company and may be shared with our Company's group companies, third parties from which our Company receives services, contracted institutions, lawyers for the resolution of legal disputes, real and legal persons with whom we have a power of attorney relationship, our business partners and other third parties.

10.1. Domestic Transfer of Personal Data

In accordance with Article 8 of the KVK Law, the transfer of personal data within the country will be possible provided that one of the conditions specified in section 6 of this Policy titled "Conditions for Processing Personal Data" is met.

10.2. Transfer of Personal Data Abroad

In accordance with Article 9 of the PDP Law, personal data may be transferred abroad by data controllers and data processors with the permission of the Board, without prejudice to the provisions of international agreements, in cases where the interests of Turkey or the person concerned would be seriously damaged, only with the opinion of the relevant public institution or organization.

In addition, personal data may be transferred abroad by data controllers and data processors in the presence of one of the conditions specified in Articles 5 and 6 and in the presence of an adequacy decision on the country, sectors within the country or international organizations to which the transfer will be made. In the absence of an adequacy decision, personal data may be transferred abroad by data controllers and data processors if one of the following appropriate safeguards is provided by the parties, provided that one of the conditions specified in Articles 5 and 6 exists, the person concerned has the opportunity to exercise his rights and to apply for effective legal remedies in the country of transfer:

- a) Existence of an agreement that is not in the nature of an international contract between public institutions and organizations or international organizations abroad and public institutions and organizations or professional organizations in the nature of a public institution in Turkey and the Board's approval of the transfer.
- b) Existence of binding corporate rules approved by the Board containing provisions on the protection of personal data, which companies within the group of undertakings engaged in joint economic activities are obliged to comply with.
- c) Existence of a standard contract announced by the Board, containing data categories, purposes of data transfer, recipients and recipient groups, technical and administrative measures to be taken by the data recipient, additional measures taken for special categories of personal data.
- ç) Existence of a written undertaking containing provisions to ensure adequate protection and authorization of the transfer by the Board.

Data controllers and data processors may transfer personal data abroad only in the presence of one of the following cases, provided that it is incidental, in the absence of an adequacy decision and if any of the appropriate safeguards stipulated in the fourth paragraph cannot be provided

- a) The data subject gives explicit consent to the transfer, provided that he/she is informed about the possible risks.
- b) The transfer is mandatory for the performance of a contract between the data subject and the data controller or for the implementation of pre-contractual measures taken upon the request of the data subject.
- c) The transfer is mandatory for the establishment or performance of a contract between the data controller and another natural or legal person for the benefit of the data subject.
- ç) The transfer is mandatory for a superior public interest.
- d) The transfer of personal data is mandatory for the establishment, exercise or protection of a right.
- e) The transfer of personal data is mandatory for the protection of the life or physical integrity of the person himself/herself or of another person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid.
- f) Transfer from a registry that is open to the public or persons with a legitimate interest, provided that the conditions required to access the registry in the relevant legislation are met and the person with a legitimate interest requests it.

10.3. Groups of Persons to whom Personal Data are Transferred by our Company

In accordance with Articles 8 and 9 of the KVK Law and within the scope of this Policy, our Company may transfer the personal data of the personal data owners within the scope of this Policy to the following groups of persons for the specified purposes:

PERSON GROUPS	DEFINITION	PURPOSE OF TRANSFER
Authorized Public Institutions and Organizations	Public institutions and organizations authorized to receive information and documents from our Company	In accordance with Articles 5, 6 and 9 of the KVK Law within the legal authority of the relevant public institutions and organizations
Authorized Private Law Persons	Private law persons authorized to receive information and documents from our Company	In accordance with Articles 5.6 and 9 of the KVK Law within the legal authority of the relevant private law persons.

11. Disclosure Obligation of our Company

In accordance with Article 10 of the KVK Law, our Company must inform personal data owners during the collection of personal data. In this context, our Company fulfills its obligation to inform on the following issues:

- Title of our Company as the data controller
- The purpose for which personal data will be processed
- To whom and for what purpose the processed personal data may be transferred
- Method and legal grounds for collecting personal data
- Rights of the personal data subject

12. Rights of Personal Data Subjects and Exercise of These Rights

In accordance with Article 13 of the KVK Law, the evaluation of the rights of personal data owners and the information required to be provided to personal data owners are carried out through this Policy as well as our Company's Personal Data Owner Application Form. Personal data owners may submit their complaints or requests regarding the processing of their personal data to us within the framework of the principles specified in the relevant form.

12.1. Right to Apply

You can submit your requests within the scope of Article 11 of the KVK Law, which regulates the rights of the data subject, in accordance with the Communiqué on the Procedures and Principles of Application to the Data Controller, at İnkılap Mah. Dr. Adnan Büyükdeniz Cad. 2.Blok No:4 Daire:10,11,12 Ümraniye, İstanbul, in writing via <https://www.gulfsigorta.com.tr/bize-ulasin> or gulfsigorta@hs02.kep.tr or by calling +90 0216 400 2 400.

Pursuant to Article 11 of the KVK Law, anyone whose personal data is processed may apply to our Company and make requests regarding the following issues related to him/her:

- To learn whether their personal data is being processed,
- Request information if personal data has been processed,
- To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- To learn the third parties to whom their personal data are transferred domestically or abroad,

- e. To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- f. To request the deletion, destruction or anonymization of personal data in the event that the reasons requiring the processing of personal data disappear and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- g. To object to the occurrence of a result to the detriment of the data subject by analyzing the processed personal data exclusively through automated systems,
- h. In case of damage due to unlawful processing of personal data, to demand the compensation of the damage.

12.2. Situations Excluded from the Scope of the Right to Apply

Pursuant to Article 28 of the KVK Law, it will not be possible for personal data owners to assert their rights in the following cases:

- a. Processing of personal data by natural persons within the scope of activities related to themselves or their family members living in the same residence, provided that their personal data are not disclosed to third parties and the obligations regarding data security are complied with,
- b. Processing of personal data for purposes such as research, planning and statistics by anonymizing them with official statistics,
- c. Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public security, public safety, public order, economic security, privacy or personal rights or does not constitute a crime,
- d. Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public security, public order or economic security,
- e. Processing of personal data by judicial authorities or enforcement authorities in relation to investigation, prosecution, trial or execution proceedings.

Pursuant to paragraph 2 of Article 28 of the KVK Law, it will not be possible for personal data owners to assert their rights (except for the right to claim compensation for the damage):

- a. Processing of personal data is necessary for the prevention of crime or criminal investigation.
- b. Processing of personal data made public by the data subject himself/herself.
- c. Processing of personal data is necessary for the execution of supervisory or regulatory duties or disciplinary investigation or prosecution by authorized public institutions and organizations and professional organizations in the nature of public institutions based on the authority granted by law.
- d. Personal data processing is necessary for the protection of the economic and financial interests of the State in relation to budget, tax and financial matters.

12.3. Response Procedure

In accordance with Article 13 of the KVK Law, our Company will finalize the application requests made by the personal data owner free of charge as soon as possible and within 30 (thirty) days at the latest, depending on the nature of the request.

The application of the personal data owner may be rejected in the following cases:

- a. Preventing the rights and freedoms of other persons
- b. Requires disproportionate effort
- c. The information is publicly available

d. jeopardize the privacy of others

e. Existence of one of the situations excluded from the scope pursuant to the KVK Law

13. Personal Data Processing Activities Conducted within the Company and Data Processing Activities Conducted on the Website

13.1. Camera Surveillance Inside the Company

Camera surveillance is carried out within our Company in order to protect the interests of our Company and other persons regarding ensuring the security of our Company and other persons.

In line with the regulations in the KVK Law, this Policy is published on our website regarding the camera monitoring activity by our Company and a notification letter regarding the monitoring is posted at the entrances of the areas where the monitoring is carried out.

There is no monitoring in areas that may result in interference with the privacy of the person. Security camera recordings can only be accessed by a limited number of our Company employees and, if necessary, employees of the security company that acts as a supplier. These persons who have access to the records declare that they will protect the confidentiality of the data they access with the confidentiality undertaking they have signed.

13.2. Entry and Exit of Visitors to the Company

Personal data processing activities are carried out to track the entry and exit of our guests who visit our company. While the name-surname information of the persons who come to our Company is obtained, the data in question are processed only for this purpose and the relevant personal data are recorded in the recording system in physical environment.

13.3. Storage of Records Regarding Internet Access Provided to Visitors of the Company

Our Company provides internet access to our visitors who request it during your stay in our buildings and facilities. In this case, log records regarding your internet access are recorded in accordance with the Law No. 5651 and the mandatory provisions of the legislation regulated in accordance with this Law; these records are processed only upon request by authorized public institutions and organizations or in order to fulfill our legal obligation in the audit processes to be carried out within our Company. Only a limited number of our employees who are under a confidentiality commitment have access to the log records obtained within this framework. Our employees who have access to these records access these records only for use in requests or audit processes from authorized public institutions and organizations and are shared with legally authorized persons.

13.4. Website Visitors

In order for people who visit our company's website to perform their visits in accordance with the purpose of their visit, their internet movements within the site are recorded in order to show them customized content and to carry out online advertising activities (e.g. cookies). Detailed explanations regarding these activities of our company are included in the Privacy Policies texts on our website.

14. Important Dates for the purpose of Code of Protection of Personal Data

7 April 2016	If not stated otherwise, provisions of this Law shall be in force on publishing date on 7 Nisan 2016
7 October 2016	Provisions of the Law stated herein below shall be in force 7 October 2017: a. Provisions regarding transmission of personal data to third persons or abroa b. Provisions regarding right of personal data owner. c. Provisions regarding complaint of personal data owner to Board of Personal Data Protection d. Provisions regarding crime and offenses arising the Code of Protectionof Personal Data
7 April 2017	If not declared otherwise by personal data owners until 7 Nisan 2017, the data processed legally before 7 Nisan 2016 shall be deemed processed adequate to this Law
7 April 2018	Personal data processed before 7 Nisan 2016 shall be adequate to this Law until 7 Nisan 2017
1 June 2024	The amendments to Articles 6, 9 and 18 of the LPPD will enter into force on June 1, 2024. However, the existing first paragraph of Article 9 of the Law No. 6698, which regulates the procedures and principles regarding the transfer of personal data abroad, will continue to be applied until September 1, 2024 with the amended version of the article.

This Policy may be revised by Gulf Sigorta when deemed necessary. The Policy shall be reviewed as needed and the necessary sections shall be updated. In case of revision, the most up-to-date version of the Policy will be available on the Company's website.