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DT İLETİŞİM HİZMETLERİ A.Ş reserves the right to update the content of this legal warning page whenever it wishes and advises its users to visit the legal warning page every time they enter the site.

Privacy and Cookie Usage Policy

DT İLETİŞİM HİZMETLERİ A.Ş. , We use internet cookies to provide a better usage experience to our visitors by observing the privacy and protection of personal data of the visitors of the website ('Website'). This Cookie Usage Policy ('Policy') explains to all our website visitors and users which type of cookies are used and under what conditions. Membership transactions and order-based lighting texts are available on our website.

This Policy is implemented regardless of what technologies, methods and how you connect to the Website. Therefore, we recommend that you read this Policy carefully and make a copy for future reference.

I. What is a cookie and for what purposes is it used?

Cookies are small data storage files saved on your computer, mobile phones, tablets or other mobile devices that you access by websites. This file stores information about your Web Site navigation. Thus, the devices you access will remember this data when you use the Website again. Therefore, cookies are necessary and important for you to use the Website effectively and more easily. Cookies are also used on the Website and third party websites so that we can offer you more suitable services, products or offers.

What are the main purposes of using cookies?

The need for some technical data for the more effective use of the Website, the collection of information about the Company's preferences and habits of browsing and using your Website, the need of your personal data such as your IP address in order for the Company to fulfill its legal and contractual obligations, especially those arising from the Law No. 5651 on Regulating Broadcasts Made on the Internet and Combating Crimes Committed Through These Broadcasts, and the Regulation on the Procedures and Principles Regarding the Regulation of Broadcasts Made on the Internet

II. What Type of Data Do We Process With Cookies?

Cookies, depending on their types, generally collect data regarding your browsing and usage preferences on the device you access the Website. This data includes all information about the pages you access, the products you view, and your navigation on the Website.

III. Which Types of Cookies Do We Use In Which Ways?

We use different types of cookies on the Website. These are cookies, function cookies, analysis/performance cookies and targeting/advertising cookies that are required to make the Website work.

Types of Cookies in Terms of Use

Compulsory Cookies

These cookies are absolutely necessary for the Website to function properly. These cookies are needed to manage the system and prevent fraudulent transactions, and if they are blocked, the Website will not be able to work.

Function Cookies

These cookies are used to give you a more advanced and easier user experience. For example, it fulfills the functions of remembering your previous preferences and enabling you to easily access some of the content on the Website. You can prevent the use of these cookies as detailed below.

Analysis and Performance Cookies

These cookies enable us to analyze and understand the functioning of the Website and to interact with you to improve the Website.

Targeting and Advertising Cookies

These cookies are used to identify and serve you content that may be of interest to you, including advertising content. You can prevent the use of these cookies as detailed below. However, blocking these cookies will not completely block the advertising content, but instead of ads that may be of interest to you, ads with general content will be served.

Types of Cookies in Terms of Storage Period

Persistent Cookies

These are cookies that persist on a person's computer until a certain date or until they are deleted by the user. These cookies are mostly used to measure users' site movements and preferences.

Session Cookies

These cookies are used to log the user's visit and do not collect data from the user. The cookie is deleted when the user closes the web page he visited or remains inactive for a certain period of time. Target and tracking cookies are used on the Website to help third parties provide services, especially advertising services, and to increase the effectiveness of these services. These cookies can remember the web pages and sites you visit and collect personal data, especially the IP address of the user device. The Website is used by both first party and third parties to collect information, remember your interests and demographic data, and serve you targeted ads, improve ads, determine the number of visits and ad impressions, other uses of advertising services, and the ratio between those ad impressions and interactions with the ad services. uses party cookies. Website; It benefits from social plugins that provide links to social networks such as Facebook, LinkedIn, Instagram. When you visit the Website and use these plugins, the Website connects directly to the server of the selected social network. Then the content offered by the plug-in is transmitted directly from the social networks to your web browser and added to the website you are visiting. Thus, the relevant social network can access and process your data and combine it with the data of your account in the relevant social network.

Please note that we have no influence or control over the scope of data that social networks process via plugins. Please carefully review the personal data processing policies published by the relevant social networks for more information on the purpose, methods and duration of the social networks' processing of your personal data.

IV. How can you prevent the use of cookies?

The use of cookies allows the Website to serve better, but you can prevent the use of cookies if you wish. However, please note that in this case, the site may not function fully and you may not be able to benefit from all its features. To prevent the use of cookies, you need to change the settings of your internet browser. These changes vary depending on the device and internet browser you are using.

For detailed information about the cookie management functions of your browser, please click on the relevant link below and get information from your browser's website.

The Company uses cookies within the scope of the Clarification Text in addition to the Policy, and reserves the right to change the terms of use regarding cookies and the Cookie Policy.

Personal Data Sharing and Communication Permission

By signing the Personal Data Sharing and Communication Permission , your personal data that you have consented to be shared with us and to send all kinds of electronic communications and other communication messages in order to provide you with various advantages and to provide advertising, promotion, sales, marketing, information, promotion, campaign notification, membership transactions, survey and customer satisfaction surveys that are suitable for you personally and services within this scope you consent to the collection, recording, processing, storage, use and transfer/sharing to the following third parties for the same purposes by DT İletişim Hizmetleri A.Ş. and DT's other business partners, authorized dealers and services. The third parties to whom you have consented to the transfer/sharing of your personal data are as follows:

- 1- Companies that provide research, promotion and consultancy services that process data on behalf of DT

This information will only be shared with third parties with whom we have a contractual relationship, who have the same legal and technical responsibilities as us in terms of data protection and security, and who comply with the provisions of the relevant legislation, only in case of need and to the necessary extent, in order to provide you with the services to be provided to you in a flawless manner, to deliver your possible shipments in a healthy way, to deliver our notifications by phone, sms and / or e-mail in a timely manner.

In accordance with Article 11 of the Law on the Protection of Personal Data No. 6698 ("KVKK"), you have the right to request to learn whether your personal data is a) processed, b) to request information if it is processed, c) to learn whether it is used in accordance with the purpose and purpose of processing, ç) to know the 3rd persons to whom it is transferred domestically / abroad, d) to request correction if it is processed incompletely / incorrectly e) to request that it be deleted / destroyed within the framework of the conditions stipulated in Article 7 of the Law on the Protection of Personal Data No. 6698, f) to request that the 3rd parties to whom you are transferred are notified of the transactions carried out in accordance with subparagraphs (d) and (e) above, g) to object to the occurrence of a result against you due to their analysis exclusively by automated systems, ğ) to request the compensation of the damage if you suffer damage due to unlawful processing.

In accordance with Article 11/d of the Personal Data Protection Law No. 6698, you can send an e-mail to contact@dt.net.tr/dtcloudnow.com in order to update / correct your records regarding your personal data, from your e-mail address registered in our company, in order to exercise your other rights under Article 11, you can send an e-mail to contact@dt.net.tr/dtcloudnow.com address with an e-mail signed with your own secure electronic signature, or you can sign a file in the format "word or pdf." addressed to our company and send it to the same e-mail address by signing it with a secure e-signature, or you can apply to the registered e-mail address available on the web page of our company with a secure electronic signature from your registered e-mail address or you can apply to our company address to the attention of the Financial Affairs and Human Resources department with a petition bearing your wet signature.

Personal Data Protection and Processing Notice (KVKK)

DT İletişim Hizmetleri A.Ş. Data Protection Clarification Text

Entrance

DT İletişim Hizmetleri A.Ş. ("**DT**", or "**Company**") attaches great importance to the legal processing of the personal data of its customers and this Data Protection Clarification Text ("**Clarification Text**") is the data protection disclosure **text** that reaches our company by any means and/or purchases products and services. or similar processing, in order to process the personal data of our customers in a transparent manner, has been prepared in accordance with Article 10 of the Personal Data Protection Law No. 6698 ("**Law**") and the European Union General Data Protection Regulation ("**GDPR**").

In this context, the Clarification Text provides information about the third parties with whom your data is shared, your rights and the methods by which you can contact us, especially which of your personal data we process as DT as data controller and for what purposes these data are processed.

If you are a customer subject to GDPR, we kindly ask you to visit <http://ww.....> for detailed information.

How Do We Obtain Your Personal Data? What is the Legal Basis for the Processing of Your Personal Data?

Your personal data; web, social media, customer conversations, SMS channels, business intelligence, contracted merchants, business / program partners and the agencies authorized to sell DT products and services and sales channels through them; if you request to receive services through these channels in verbal, written or electronic form by fully and partially automatic and non-automatic means, the website located atcom.tr ("Website"); software and applications (" Application ") provided through computers or other smart devices; Social media accounts managed by persons authorized to provide services on behalf of DT, instant messaging applications that mediate the service provided by DT such as WhatsApp Business, Telegram, Facebook Messenger, WeChat, BiP, and all other digital channels to be referred to are obtained through "Digital Media" . In accordance with the Law, your personal data can only be processed if there is at least one of the conditions stipulated in the Law. We, as DT, regardless of the purpose for which we process your personal data in accordance with the provisions of national and international legislation, especially the basic principles in Article 4 of the Law and based on the personal data processing conditions listed within the scope of Articles 5 and 6 of the Law. In this context as DT İLETİŞİM HİZMETLERİ A.Ş. we process the personal data of our customers within the scope of our legitimate interests, provided that i) it is explicitly stipulated by law, ii) it is directly related to the establishment or performance of a contract iii) the obligations to which we are subject in accordance with the applicable national and international legislation and iv) it does not have a negative result on the fundamental rights and freedoms of our customers.

In addition to personal data processing requirements, in some cases we may request your express consent to process your personal data. In such cases, your personal data will be processed limited to the scope of the express consent you have given with your free will. You have the opportunity to withdraw your express consent at any time.

What Personal Data Do We Process?

The general information regarding your personal data processed by DT is as follows.

- **Identity and Contact Information:** Your personal data such as name, surname, identification number, passport information etc. and personal data such as e-mail address, telephone number, mobile phone number, social media contact information, address etc. that you have provided when creating an account, while receiving product and services.
- **Your evaluations and requests:** Evaluation information we have provided from you on our services
- **Your payment information:** Credit/debit card information, bank account information, IBAN information, balance information, credit balance and other financial information
- **Marketing Information:** Reports and evaluations showing the habits and tastes of the person associated with our customers and to be used for marketing purposes, targeting information, cookie records, information derived through data enrichment activities, information and evaluations obtained as a result of personal surveys, satisfaction surveys, campaigns and direct marketing studies.

For What Purposes Do We Process Your Personal Data?

DT processes your personal data for the following purposes.

- **Contact:** To inform you, about our usual activities such as contacting our customers by SMS, e-mail or telephone in order to share confirmation information about your purchase of products, services, to convey payment or other information to you, (we would like to remind you that, Messages sent only for the above purposes or to provide similar service information may be sent to you by DT, even if you do not give consent to receive messages, they are not subject to approval pursuant to Article 6 of the Regulation on Commercial Communication and Commercial Electronic Messages)
- **Evaluation of Your Requests and Opinions:** Receiving and evaluating the opinions, complaints and evaluations of our customers about our services through written/online forms and surveys.
- **Legal Obligations:** Ensuring compliance with the national and international legislation to which DT is subject and fulfilling the obligations arising from the relevant legislation,
- **Service Customizations:** Suggesting and promoting the offered programs, services and products to the people concerned, and performing activities to customize them according to the usage habits and needs of the relevant people.
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To Whom and For What Purposes Do We Transfer Your Personal Data?

In some cases, we may transfer your personal data processed by us to third parties at home or abroad within the framework of the provisions of national and international legislation, especially Articles 8 and 9 of the Law.

The third parties to whom we may transfer your data are categorically as follows:

- **Our business partners at home and abroad;**
- **Our group companies,** e.g. Some of the services offered by DT are carried out through our affiliates, and your personal data may be shared with our relevant group companies in this context.
- **Our Suppliers;** e.g. As DT, we receive technical support from software companies, security companies or companies that provide transportation services, etc.
- **Authorized private institutions and organizations and public institutions authorized by national and international legislation;** e.g. law enforcement officers as part of investigations carried out

Information About Commercial Electronic Messages

In line with the permission you have given in accordance with the Law No. 6563 on the Regulation of Electronic Commerce and the Regulation on Commercial Communication and Commercial Electronic Messages, your personal data may be processed in order to provide information about our services, to promote our goods and services and to ensure that you are aware of our campaigns. In accordance with the relevant legislation, your commercial electronic message permissions must be recorded in the Message Management System (İYS) and in this context, the contact address (telephone number or e-mail address), permission date, communication channel, recipient type and permission source data will be shared with the İYS. You can visit <https://iys.org.tr> address to get detailed information about İYS.

What rights do you have as a data owner?

In accordance with Article 11 of the Law, you have many rights in relation to your personal data. In this section we would like to inform you about your rights and the methods of using them. Your rights under Article 11 of the Law are as follows:

- You can learn whether your personal data is processed by us,
- If your personal data has been processed by us, you can request information from us about this,
- Find out for what purposes we process your personal data and whether your personal data is used in accordance with these purposes,
- You can learn about the third parties to whom we transfer your personal data at home or abroad,
- If we have processed your personal data incompletely or incorrectly, you can request their correction and that these corrections are also forwarded to the third parties to whom we have transferred your personal data.
- Although we have processed your personal data in accordance with the Law and other relevant national and international legislation provisions, you may request the deletion or destruction of your personal data if the reasons requiring the processing of your personal data disappear and you may request that the corrections made in this context be forwarded to the third parties to whom we have transferred your personal data.
- In the event that a result arises against you by analyzing the data we process exclusively through automated systems, you can object to this result,
- In case you suffer any damage due to the processing of your personal data contrary to the Law, you can request the compensation of the damage caused by the unlawful data processing.
- If you are a passenger subject to GDPR, we kindly ask you to visit <http://.....> for detailed information about your rights.

In order to easily exercise your rights mentioned above and to easily communicate the relevant requests to us, you can contact us via our contact information below. We will respond to you as soon as possible depending on the nature of your application and no later than thirty days. As a rule, applications of data owners are answered free of charge; however, in case of an additional cost, we reserve the right to charge you a fee according to the tariff to be determined by the Personal Data Protection Board.

Our Contact Information

DT İLETİŞİM HİZMETLERİ A.Ş.

Web dt.net.tr

Phone - 0(850)333 38 83

Address - Cavusbasi Cumhuriyet Street No:391 Beykoz, Istanbul, Turkey

DT İLETİSİM HİZMETLERİ A.Ş. GDPR Privacy Statement

1. Introduction of the Data Controller and this Privacy Statement

As the data controller, DT İletişim Hizmetleri A.Ş (hereinafter referred to as “**DT**” or “**Company**”) pays utmost attention to the legality of the processing of personal data of its customers. To ensure compliance with the **European Union General Data Protection Regulation (Regulation (EU) 2016/679) (“GDPR”)**, we have prepared this Company GDPR Privacy Statement (“**Privacy Statement**”) on the protection and processing of personal data.

The security of our **customers' personal data** is at the forefront of our work. For this reason, in order to prevent unlawful access or leakage of personal data and to ensure that personal data of our customers are kept securely, this data is transferred only to reliable business partners and at a minimum level, by taking the necessary security measures in accordance with the legislation in force.

Transparency is one of the key issues in our personal data protection program. In this context, we have prepared this Privacy Statement in order to provide our customers with all necessary information when processing personal data, for example, to comply with our legal obligations and to provide a better customer experience. Detailed information on the types of personal data and the purposes of processing personal data are detailed in section 5 of this Privacy Statement.

Another issue we pay attention to is the right of customers to have control over their personal data. We take measures to ensure that our customers manage their preferences regarding their personal data and that they respect their preferences with the utmost respect. This Privacy Statement also explains your data protection rights, including the right to object to certain processing activities that DT performs.

In summary, data security, transparency and the right of individuals to have control over their personal data are essential to us in ensuring compliance with GDPR.

This Privacy Statement contains our statements and explanations regarding the processing of personal data regarding other natural persons who communicate with us, excluding our customers and employees, in accordance with the provisions of the GDPR.

This Privacy Statement has been prepared to provide information about which personal data DT processes within the scope of its commercial activities, the purposes of processing, the parties to which personal data is transferred and the purposes of these transfers.

2. Contact Information

If you have any concerns about how we process your data or if you wish to opt out of direct marketing under applicable law, you can reach:

DT İletişim Hizmetleri A.Ş.

Web site : dt.net.tr

Phone : 0(850)333 38 83

Address : Cavusbasi Cumhuriyet Street No:391 Beykoz, Istanbul, Turkey

3. How Do We Collect Your Personal Data?

This section covers the source of information and the channels through which personal data is collected:

- Web, social media, customer conversations, SMS channels, business intelligence, contracted merchants, business/program partners and agencies authorized to sell DT products and services and sales channels through them; verbally, in writing or electronically, in whole or in part, by automated and non-automatic means.
- If you request to receive services through these channels, the website at dt.net.tr ("**Website**"); software and applications ("**Application**") provided through computers or other smart devices; Social media accounts managed by persons authorized to provide services on behalf of DT, instant messaging applications such as WhatsApp Business, Telegram, Facebook Messenger, WeChat, BiP, etc. that mediate the service provided by DT, and all other digital channels to be referred to come together as "**Digital Media**".

4. Which Personal Data Do We Collect and Process?

Personal data processed by our company differs according to the nature of the legal relationship established with our Company. In this context, the categories of personal data collected by our Company through all channels, including Digital Media, are as follows:

- **Identity and Contact Information:** Personal data such as name, surname, official identification number, passport information and contact information (such as e-mail address), telephone and mobile phone number or social media contact information, which you have given us when creating the account,
- **Customer Transaction Information** (personal data stored in channels such as call centers, credit card statements, purchase, cancellation, inclusive customer instructions and other changes to an individual's instruction or request.)
- **Transaction Security Information** (website password etc. information given during the use of products and services offered in Digital Media)

- **Request/Complaint Management Information** (such as information and records collected regarding requests and complaints regarding our products or services, and information contained in reports regarding the conclusion of these requests by our business units).
- **Financial Information** (credit/debit card information, bank account information, IBAN information, balance information, credit balance information and other financial information.)
- **Physical Environment Security Information** (Entry/exit logs, visit information, camera records in the physical environments of the company)
- **Legal Procedure and Compliance Information** (information provided within the scope of information requests and decisions of judicial and administrative authorities.)
- **Audit and Inspection Information** (Information on all kinds of records and transactions regarding the legal request of the data owner and the exercise of our rights.)
- **Marketing Information** (such as reports and evaluations attributable to the data owner and containing information indicating preferences, tastes, usage and travel habits used for marketing purposes, targeting information, cookie records, data generated within the scope of data enrichment operations, survey records, satisfaction, surveys, information and evaluations obtained as a result of campaigns and direct marketing activities.)
- **Visual Information** (photos, camera.)
- **Voice Information** Call center voice recordings with your explicit consent.
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5. Why Do We Process Your Personal Data and What is the Legal Basis for This Use (Purpose of Processing)?

We process your personal data for the following purposes:

- To fulfill a contract or take steps in connection with a contract we have with you. (According to Article 6/(1) of GDPR, Subparagraph 1(b)) This includes:
 - **Establishing communication with our customer and customer relationship management**

In some cases, we are required to provide our customers with certain information about our flights. For example, we may need to contact you via SMS, email or phone to provide confirmation or payment information regarding the purchase of the product and/or Service. In addition, customers who benefit from the services offered through the Application can also be contacted via in-app notifications.

As necessary to conduct our business and pursue our legitimate interests (in accordance with Article 6/(1) GDPR, Subparagraph 1(f)), in particular:

- **Requests and Evaluations:** Your personal data may be processed in order to take necessary actions in order to respond to the questions, requests or complaints of our customers through Digital Media or other written and verbal channels. The opinions of our customers are of great importance to us. For this reason, we may process personal data when evaluating our customers' responses to questions within the scope of customer satisfaction surveys in order to evaluate the quality of our services.
- **Fraud prevention:** We monitor the actions of customers in accordance with applicable laws to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime.
- **Establishment of information technology infrastructure, execution and supervision of information security processes and operations:** Personal data about you may be processed for the purposes of ensuring compliance with internal policies and procedures regarding information security, management, improvement and optimization of information technology systems. Ensuring the availability and reliability of these infrastructures and systems through backups and testing, improving the products and services provided, including statistical analysis and research of systems and programs related to ticketing and travel operations.
- **Execution of financial and accounting transactions:** Personal data about you may be processed for the purposes of complying with information obligations including identification and verification, preventing fraudulent transactions, receiving payments and reimbursement when deemed necessary.
- **Service Customization:** Presenting, recommending and promoting programs, services and products to the relevant people and performing activities to customize them according to their usage habits and needs.
- **Usage Information:** Your usage habits on our website and applications can be tracked in order to provide better service to our customers and to customize our services for you. In addition, information such as IP address, device model, etc. regarding the devices you view on our site or use our applications may be processed just for the purpose of providing services. Where required by law, marketing and advertising activities through targeting and profiling are only performed with your consent.

For purposes required by law (in accordance with Article 6/(1) GDPR, Subparagraph 1(c)) (legal obligations):

- Ensuring compliance with national and international legislation to which DT is subject and fulfilling the obligations arising from the relevant legislation. In response to requests from government or law enforcement agencies conducting an investigation.
- In such cases, it may be necessary to comply with business or tax retention requirements or to meet security-related requirements.
- When you have given us your consent (in accordance with Article 6/(1) of GDPR, Subparagraph 1(a)):

- **Marketing activities:** Where required by law, we will send you direct marketing related to our related products and services or other products and services provided by us, our affiliates and carefully selected partners, with your consent.
- **Cookies:** We place cookies and use similar technologies in accordance with our Cookie Notice and the information provided to you when these technologies are used. For more information see “Use of Cookies”

Revoking consent or otherwise objecting to direct marketing:

Wherever we rely on your consent, you will always be able to withdraw this consent, although we have other legal grounds to process your data for other purposes such as those set out above. You have an absolute right to opt out of direct marketing or profiling that we carry out for direct marketing at any time. You can do this by following the instructions in the communication, where this is an electronic message, or by contacting us using the information provided below.

6. To Whom, Why and Where Do We Transfer Your Personal Data?

The recipients to whom we may transfer your data can be categorically listed as follows:

- Our business partners located in Turkey or abroad
- **Group companies:** Some of the services offered by DT are carried out by our affiliates, and in this context, your personal data may be shared with our related affiliates.
- **Suppliers:** Your personal data will also be shared with service providers, especially website hosting, software, maintenance, call centers.
- **If the business is sold or integrated into another business,** certain pieces of your information may be disclosed to our advisors and prospective purchasing advisors and passed on to the new owners of the business.

We will only transfer your personal data outside the EEA if appropriate security measures ensure that an appropriate level of protection is in place.

Further information on such transfers or copies of these measures can be obtained through the contact details above.

Third Party Websites: Our website may contain links to third party websites, microsites, plug-ins and applications. Please note that clicking or activating these links may allow third parties to collect or share data about the following. We do not control these third-party websites and are not responsible for their privacy statements. Therefore, please read the privacy statement of third parties whenever you use these links or microsites or leave our website.

7. How long will you keep my data?

DT is subject to legal obligations regarding data retention periods under Turkish law, European Law and national laws of a country (eg. USA, Germany, Italy, Spain, Switzerland etc.) depending on the country you live in or which law is applicable. As DT, as a global company, has locations in different countries and relevant laws have changed since then, retention periods may vary from country to country.

Your personal data will be deleted as soon as it is no longer necessary for the stated purposes. However, we may sometimes continue to store data until the retention periods and deadlines set by the legislative or supervisory authorities, depending on the periods specified by the Turkish Commercial Code, the Tax Code, the Turkish Code of Obligations and other applicable European legislation. After that, the relevant data is routinely deleted or anonymized.

Where we process personal data for marketing purposes or with your consent, we process the data until you ask us to stop and shortly thereafter (to allow us to fulfill your requests). We also keep a record of your request that we not send you direct marketing or process your data so that we can respect your request in the future.

8. Principles regarding personal data privacy

Principles regarding personal data privacy Our company acts in accordance with the following principles in all data processing activities. “Legality, fairness and transparency”, “purpose limitation”, “data minimization”, “accuracy”, “storage limitation”, “integrity and confidentiality” and “accountability”.

9. Use of cookies

As DT, we use technologies such as cookies, pixels, GIFs (“**Cookies**”) to improve your user experience while using our websites and applications. The use of these technologies complies with the Law and other relevant regulations to which we are subject.

10. Use of Digital Platforms

Your personal data may be processed during your use of the Digital Platforms in order to manage and operate the Website, to perform activities to optimize and improve the user experience of the Website and the Application, to identify and support the ways in which the Website is used. Improve the use of location-based tools to manage your online accounts and inform you about services available near you.

If you want to benefit from the products and services offered, your personal data will be processed only to enable you to benefit from these products and services.

11. What Are Your Rights as Data Owners?

You have the following rights under GDPR

- Right to withdraw consent (Art. 7 GDPR) Right of access (Art. 15 GDPR)
- Right to rectification (Art. 16 GDPR)
- Right to erasure (Art. 17 GDPR)
- Right to restriction of processing (Art. 18 GDPR) (Madde 18 GDPR)
- Right to data portability (Art. 20 GDPR)
- Right of objection (Art. 21 GDPR)

Under GDPR or national law, your request may be limited to those rights if, for example, fulfilling your request would expose personal data about another person, it would violate a third party's rights (including

our rights). Relevant exemptions are included in GDPR or applicable national laws. We will notify you of relevant exemptions that we rely on when responding to any request you make.

13. Right to object to the processing of personal data (Art. 21 GDPR)

As mentioned above, you have the right to object to the processing of your personal data based on Article 6 (1) (e) or (f) of the GDPR, including profiling, at any time, on grounds relating to your particular situation.

We will no longer process personal data unless we demonstrate compelling legitimate grounds for processing that override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

Where personal data is processed for direct marketing purposes, you have the right at any time to object to the processing of your personal data for such marketing, including profiling, to the extent that it relates to such direct marketing.

If you object to processing for direct marketing purposes, your personal data will no longer be processed for these purposes.

In the context of the use of information society services and despite Directive 2002/58/EC, you can exercise your right to object by automated means using technical specifications.

14. Data security

- We take all appropriate technical and organizational measures to protect your personal data and reduce the risks associated with unauthorized access, accidental data loss, deliberate deletion or damage to personal data.

In this direction, our company;

- Ensures data security by using other software and hardware, including virus and other malware protection systems, firewalls and intrusion prevention systems,
- Access to personal data within our Company is carried out in a controlled process in accordance with the nature of the data and on the basis of what needs to be known precisely,
- Provides necessary audits for the implementation of GDPR provisions in accordance with Article 32 of the GDPR,
- To ensure the legality of data processing activities through internal policies and procedures,
- Implements stricter measures for access to special categories of personal data,
- In case of external access to personal data due to outsourced service procurement, our Company undertakes to comply with the GDPR provisions of the relevant third party,
- Takes necessary actions to inform all employees, especially those with access to personal data, about their duties and responsibilities under GDPR.

15. Changes to this Privacy Statement

We reserve the right to make changes to this Privacy Statement to provide accurate and up-to-date information on practices and regulations regarding the protection of personal data. In the event of a significant change in the Privacy Statement, data owners will be informed by appropriate means.