

## **DISCLOSURE STATEMENT REGARDING PROTECTION & PROCESSING OF PERSONAL DATA**

### **1. Purpose**

**TI Sparkle Turkey Telekomunikasyon Anonim Şirketi** (“**TIS Turkey**” or “**Company**”) is global company that is part of Telecom Italia Group, with headquarters in Italy. TIS Turkey is dedicated to protecting the confidentiality and privacy information entrusted to us. Therefore, TIS Turkey shall comply with the data protection provisions under the Regulation 2016/679/UE (General Data Protection Regulation-hereinafter as “**GDPR**”) and Turkish Data Protection Law which is Law on the Protection of Personal Data No. 6698 (“**LPPD**”). This Disclosure Statement Regarding Protection and Processing of Personal Data (“**Disclosure Statement**”) explains how your personal data is collected and processed, what kind of data is collected, how that personal data is used, what your rights are on your personal data pursuant to GDPR and LPPD regarding the services offered and presented to you by TIS Turkey as a Data Controller.

### **2. Collection and Purposes of Processing Personal Data**

The scope of the personal data that you share with us upon your own explicit consent includes, but not limited to personal data such as your full name, date of birth, ID information, mobile number, e-mail, gender, address, profession, and your education status and credit card number or bank details. Your personal data collected may vary depending on the service, product or business activity provided by our Company and it may be also be collected automatically or as a condition to be a part of any data recording system, non-automatically by written, verbal or electronic means or through our Company’s offices, branches, agents, human resources department or our website etc. Your personal data may also be collected through the use of inquiry and registration forms or online surveys conducted via our Company’s website.

Your personal data will be processed and updated as long as you benefit from our Company's products and services. TIS Turkey collects, holds and uses personal information as per the Articles 5 and 6 of the LPPD and in compliance with the provisions of GDPR for several purposes including:

- In order to carry out necessary operational activities within our Company,
- To perform necessary operations with relevant business units and business partners to ensure that products and services provided are offered to you in line with your consumption or purchasing criteria;
- To provide you with products and services suited to your likes, consumption and purchase habits and your requirements;
- To conduct market research surveys;
- To analyse and archive customer portfolio and website visitors;
- To carry out obligations arising out of employment agreement and/or regulations for company employees;
- To ensure the rights of individuals through carrying out human resources management by our Company and to carry out personnel affairs and to make salary payments, to evaluate job applications;
- To carry out obligations arising out of employment agreement and/or regulations for Company employees;
- To ensure the legal security of the individuals that our Company is associated with and of our Company;
- To inform authorities as required by regulations;
- To ensure that the data is accurate and up-to-date.

### **3. Transfer of Personal Data**

Your personal data may be transferred to business associates, other companies belonging to the Telecom Italia Group, with headquarters in Italy and/or in other countries, suppliers, shareholders of our Company and to public bodies and individuals legally authorized for the purposes mentioned above within the scope of personal data processing conditions and purposes pursuant to the Articles 8 and 9 of the LPPD.

### **4. The Rights of the Personal Data Owners**

According to Article 11 of the LPPD, personal data owners have a right to;

- a) Learn whether her/his personal data is being processed;
- b) Request information as to the possibility of processing of his/her data,
- c) Learn the purposes of such processing of personal data and whether processed data is being used in accordance with these purposes,
- d) Learn whether his/her personal data is being transferred within the country or to abroad,
- e) Request amendment in case his/her personal data processed is incomplete or inaccurate and request that the process carried out in this context to be notified to the third parties to whom the personal data is transferred,
- f) Pursuant to Article 7 of the LPPD, request the deletion or termination of his/her personal data in the event that the reasons for its processing are no longer present, despite having been processed in accordance with the provisions of the LPPD and other related laws, and request that the process carried out in this context to be notified to the third parties to whom the personal data is transferred,

- g) Request that the parties to whom his/her data is transferred are informed of the transactions carried out as per paragraphs (d) and (e),
- h) Object to the occurrence of a result to the detriment of the person himself/herself, by means of analysing the processed data exclusively through automated systems,
- i) Request compensation for the damages in case the person incurs damages due to unlawful processing of his/her personal data.

You are required to exercise your rights within the scope of the LPPD in written form individually to the address of our Company at Cobancesme Mahallesi Kimiz Sokak No:30 Yenibosna, Istanbul. Your inquiries noted in your application shall be evaluated within the shortest time and within thirty (30) days at the latest.