

TI SPARKLE TURKEY TELEKOMUNIKASYON ANONIM SİRKETİ
(“TIS TURKEY”)
PERSONAL DATA PROCESSING AND PROTECTION POLICY

1. PURPOSE AND PRINCIPLES

TI Sparkle Turkey Telekomunikasyon Anonim Şirketi (“TIS Turkey” or “Company”) is global company that is part of Telecom Italia Group, with headquarters in Italy. Protection of personal data is highly sensitive to TIS Turkey and its affiliates and is among our Company’s top priorities. Personal Data Processing and Protection Policy (the “Policy”) sets out the principles of data protection and processing rights of the Company’s customers, potential customers, web-site users, employees, employee candidates, previous employees, visitors and shareholders and directors of the Company with respect to their personal data collected, processed and protected subject to data protection provisions under the Regulation 2016/679/UE (General Data Protection Regulation-hereinafter as “**GDPR**”) and the Law on Protection of Personal Data No. 6698 (“**LPPD**”)

2. PERSONAL DATA PROCESSING POLICY

2.1. Principles of Personal Data Processing

TIS Turkey shall process personal data within the scope of LPPD and related regulations. Under the LPPD principles, all personal data shall be:

- Processed lawfully and fairly.
- Accurately and where necessary, kept up to date.
- Processed for specific, clear and legitimate reasons.
- Used and disclosed in limited and reasonable manner.
- Kept no longer than predetermined periods noted in the related legislation or necessary for the purposes of processing.

2.2 Reasons of TIS Turkey for Processing Personal Data

As per Article 10 of the LPPD, TIS Turkey informs the relevant persons when collecting personal data. TIS Turkey heads light on the identity of TIS Turkey and its representatives (if applicable), the purpose for processing the personal data, to whom and why the processed personal data may be transferred, the method for collecting personal data, the lawful reasons for collection and the rights of the relevant persons as per Article 11 of the LPPD.

TIS Turkey processes personal data in line with the Articles 5 and 6 of the LPPD and in accordance with the purposes listed below.

2.2.1 Terms

- TIS Turkey may process personal data if it is required to fulfil a legal obligation or if law requires the personal data or allows these transactions;
- TIS Turkey may process personal data in case the processing of personal data is directly related to and necessary for signing or performing a contract [*Personal data may be processed to draft a proposal before concluding a contract or to fulfil the inquiries of such relevant persons as a result of a contract.*];
- TIS Turkey may process personal data provided that it is made anonymous and for the limited purposes of transforming such data into an anonymous form;

- TIS Turkey may process personal data in case it is required to establish, use or protect the rights of TIS Turkey, of the individuals whose data is being processed or of other parties;
- TIS Turkey may process personal data for its own legitimate interest provided that the fundamental rights and freedoms of the persons whose data is processed are not violated [*legitimate interests are interests that are in line with the law, morals and customs including commercial and material interests*];
- TIS Turkey may process personal data to protect the data owner's or someone else's life or bodily integrity even when it is impossible or not legally valid for the personal data owner to express consent;
- TIS Turkey may process private personal data except the ones related to the health and sex life of the data owner, in circumstances defined in applicable laws.

If the conditions stated above do not exist, TIS Turkey shall ask for the explicit consent to process personal data from the personal data owners.

2.2.2 Purposes

Your personal data shall be processed in accordance with the following purposes stated below:

- 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.

2.3. Processing Personal Data of Candidate Employees

TIS Turkey shall process personal data of candidate employees in order to fulfil the legal obligations pursuant to Labor Law and related regulation and to perform determined recruitment activities of TIS Turkey HR department provided that TIS Turkey shall inform employee candidates and ask for the explicit consent to process personal data from the employee candidates. Personal data of candidate employees shall be collected and processed during job interviews and/or any written or electronic methods. Since TIS Turkey is an international company and holds information systems in different countries and it is possible for new candidates to be evaluated in different positions, personal data of candidate employees may be transferred other TIS Turkey' subsidiaries located other countries pursuant to provisions of the LPPD. TIS Turkey shall inform public authorities as required by regulation. The main

purpose of the processing of personal data of employee candidates is recruitment and personal data shall also be processed for the following purposes:

- To evaluate qualifications, experience and interest of the employee candidate for open position(s);
- If necessary; to check the accuracy of the information given by the employee candidate or contact the third party individuals (such as references) to conduct research on the employee candidate;
- To contact the employee candidate regarding process of application and recruitment or where appropriate; to contact with the employee candidate for any open positions in such country or abroad;
- To fulfil the requirements of the relevant regulation or the request of the authorized institution(s).

The personal data of employee candidates shall be kept for a period in compliance with the deadlines referred to in under the Article titled "Retention Periods for Personal Data" of the current this Policy. Following the deadlines, the personal data shall be terminated or anonymized.

3. SECURITY OF PERSONAL DATA

Pursuant to Article 12 of the LPPD, TIS Turkey shall take necessary measures to provide an appropriate level of security to prevent illegal processing of the personal data, illegal access to personal data and to ensure protection of personal data and prevent illegal processing by third parties.

4. TRANSFERRING PERSONAL DATA

4.1. Domestic Transfer of Personal Data

Pursuant to Article 8 of the LPPD, TIS Turkey may transfer personal data and private personal data to third parties (its business partners, shareholders, affiliates, public institution(s) in which TIS Turkey has legal obligation to and other third parties) by taking all the safety measures defined in the LPPD. Accordingly, TIS Turkey shall comply with the provisions stated in the Article 8 of the LPPD.

4.2. Cross Border Transfer of Personal Data

TIS Turkey may transfer personal data being processed in Turkey or being processed and stored overseas, as mentioned above, including that data being processed via external resource usage, to unrelated persons in Turkey or overseas, on condition that it is transferred in line with the conditions defined in the LPPD and other relevant legislation, taking all the safety measures defined in legislation, unless there is a contrary clause in LPPD, other relevant legislation or, if applicable, the contract signed with the data owner. Under exceptional conditions where explicit consent is not required to transfer personal data defined in LPPD, in addition to the processing and transfer requirements it is required that sufficient protection is available in the country where the data is to be transferred. Personal Data Protection Board (“**Board**”) shall determine whether sufficient protection is provided. In the event that there is not sufficient protection, data personnel both in Turkey and overseas need to approve sufficient protection in writing and the Board needs to grant a permission for the purpose.

4.3. Institutions and Entities to which Data is Transferred

TIS Turkey may share the information requested by public legal entities as per Article 8 of the LPPD. Other persons and institutions to whom the personal data might be transferred for the purposes mentioned above are as follows: subsidiaries and/or direct/indirect domestic/overseas institutions and other unrelated persons, who provide services, cooperate with TIS Turkey, alongside of TIS Turkey, for taking data

security measures such as the protection of all kinds of personal data and preventing unauthorised access and illegal processing.

5. RETENTION PERIODS FOR PERSONAL DATA

TIS Turkey applies the principle that, in case available, the personal data shall be kept for the periods specified in the relevant laws and regulations. In case a retention period is not determined with the relevant legislations, the personal data shall be deleted, terminated or anonymized after being processed for the time required for the practices of TIS Turkey and commercial practices or the statutory time limits prescribed by the relevant laws depending on the activity carried out for that transaction. In accordance with the relative legislations, durations for retention and deletion of personal data are as follows:

Retention and Deletion Periods of TIS TURKEY		
Category of Data	Retention Period (Following the termination of the Relation)	Regular Deletion Periods
Data arising out of contractual relationship (General statute of limitation regulated on Turkish Code of Obligations)	10 (ten) Years	Periodically within the month in which ten (10) years has expired for each data and/or within the six (6) month data deletion cycles determined by the data controller after the expiry of such retention period.
Data arising out of tenancy	5 (five) Years	Periodically within the month in which five (5) years has expired for each data and/or within the six (6) months data deletion cycles determined by the data controller after the expiry of such retention period.
Data regarding employees' wage rights	5 (five) Years	Periodically within the month in which five (5) years has expired for each data and/or within the six (6) months data deletion cycles determined by the data controller after the expiry of such retention period.
Medical examination data of Employees	15 (fifteen) Years	Periodically within the month in which fifteen (15) years has expired for each data and/or within the six (6) months data deletion cycles determined by the data controller after the expiry of such retention period.
Tax-related records	5 (five) Years	Periodically within the month in which five (5) years has

		expired for each data and/or within the six (6) months data deletion cycles determined by the data controller after the expiry of such retention period.
Processed personal data of consumers	2 (two) Years	Periodically within the month in which two (2) years has expired for each data and/or within the six (6) months data deletion cycles determined by the data controller after the expiry of such retention period.
Personal data of employee candidates	6 (six) Months	Periodically within the month in which six (6) months has expired for each data and/or within the six (6) months data deletion cycles determined by the data controller before the expiry of such retention period.
Personal data of visitors	6 (six) Months	Periodically within the month in which six (6) months has expired for each data and/or within the six (6) months data deletion cycles determined by the data controller before the expiry of such retention period.

6. THE RIGHTS OF PERSONS WHOSE PERSONAL DATA IS BEING PROCESSED BY TIS TURKEY AND HOW DO DATA OWNERS MAKE USE OF THEIR RIGHTS

Pursuant to Article 11 of the LPPD, natural persons whose personal data is processed by TIS Turkey have the following rights 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.

Personal data owners can submit their request related to their rights above to the address of our Company at Cobancesme Mahallesi Kimiz Sokak No:30 Yenibosna, Istanbul along with information and documentation that confirms their identity, free of charge.

7. DELETION, TERMINATION AND ANONYMISATION OF PERSONAL DATA BY TIS TURKEY

As per Article 138 of the Turkish Penal Code and Article 7/f.1. of the LPPD, even if personal data is processed as per the terms of the relevant law, if the reason for processing the data no longer exists, the personal data shall be deleted, terminated or anonymised upon a decision by TIS Turkey or the request of the personal data owner. TIS Turkey reserves the right to reject the data owner's request in cases where TIS Turkey has the right or is obliged to keep the data as per the terms of relevant regulation. TIS Turkey shall delete, terminate or anonymise the personal data within six (6) months upon the end of retention periods set forth in relevant regulation or at the end of the required processing period, by using one or more of the anonymization and deletion techniques specified in the guidelines for Deleting, Termination or Anonymizing Personal Data published by the Board.

8. OTHER ISSUES

If there is a conflict between this Policy and the LPPD and the terms of other relevant regulation, the LPPD and other relevant regulation shall prevail. TIS Turkey may make changes or update in this Policy in line with legal regulations and its Company policies. The new Policy reflecting all these changes and updates shall be published at the Company's website.