

## TURKCELL GLOBAL BİLGİ INFORMATION NOTICE

This Information Notice has been issued by **Global Bilgi Pazarlama Danismanlik ve Cagri Hizmetleri A.S.**, registered at Istanbul Trade Registry Office with the registration number 426382 (hereinafter referred to as "Global Bilgi"), which acts in the capacity of data controller under Article 10 of the Personal Data Protection Law No. 6698 ("Law") and the Communique Regarding the Procedures and Principles on Compliance with the Obligation to Inform, and its objective is to specify the terms and conditions on the use of personal data obtained within the scope of services offered by Global Bilgi and/ or received from the third parties.

Global Bilgi represents to comply with the applicable national legislation on protection of personal data, in particular the Personal Data Protection Law No. 6698 of March 24, 2016 ("Law"), and act in accordance with any legal obligation on processing the personal data based on the principle of protecting the confidentiality of personal data.

In this regard, this Information Notice has been issued to provide information about how and for what purpose your personal data is processed and protected by Global Bilgi, and to ensure the highest level of transparency to the extent possible.

### I. Definitions:

Pursuant to the Law and this Information Notice:

- "**Personal Data**": means all kinds of information pertaining to an identified or identifiable real person,
- "**Anonymous Data**": means the data that is rendered incapable of being associated with any identified or identifiable natural person, even when combined with other data,
- "**Processing of Personal Data**": means all kinds of processes performed about personal data obtaining, storing, archiving, recording, modifying, editing, disclosing, transferring, taking over personal data, making them accessible, classifying, or preventing the use of personal health data through fully automatic or partially automatic or non-automatic ways provided that they are a part of a data storage system.

### II. What are the purposes and methods of collecting your data?

Our primary purpose in collecting your data is to provide you with a secure, uninterrupted, efficient, and personalised service. Global Bilgi and service providers acting on behalf of Global Bilgi collect and use your relevant personal data only to the extent necessary and in the manner authorised to perform the following operations.

Your data may be collected through call centres, websites, mobile applications, text messages, e-mail, voice response systems, and any other written, verbal, or electronic means, based on your consent to the processing of your personal data or on the legal grounds specified in Articles 5 and 6 of the Law and other legislation, and may be processed and transferred for the purposes specified in this document.

### III. What Data is Collected?

The data processed within the scope of the services provided by Global Bilgi and considered Personal Data in accordance with the Personal Data Protection Law No. 6698, without being limited to those listed, are listed in groups provided below.

- **Identification and Contact Information:** T.R. identification number, name, surname, place and date of birth, marital status, gender, identity document's copy/image, and other similar identity information that could identify you; your contact details such as address, telephone/fax number, username (nickname), avatar, email address and other similar data, membership details, passwords used for identity verification and account access,
- **Data on Use:** Satisfaction survey or similar survey results, what type of messages (text, video, etc.) were sent without retaining information about the content including but not limited to data collected from devices via various software and technological tools, the time periods during which the service was active, the services being monitored, the date, time and duration of messages and calls within the scope of the service provided, and the date and time of connection to and disconnection from the system in relation to all types of access made via the internet, your usage habits regarding the interface of the applications provided by Global Bilgi that you use, the date of your last login to the relevant application, errors that occurred during use and similar data, and, if applicable, your analytical data regarding reward programmes collected by other services,
- **Location Data:** Your precise or approximate location, depending on your device settings, data identifying nearby base stations and Wi-Fi hotspots along with GPS data, location data derived from IP addresses, your traffic data such as navigation data, source and destination point information, and other connection details;
- **Payment Data:** The information and documents you provide during the sales process; data obtained when communicating via email, letter and other means, and your voice call recordings kept in accordance with call centre standards; your voice recording which may be used as a means of identity verification upon request; data obtained through sales channels, such as demand and transaction information Your invoice and payment details (name, surname, billing address), invoices sent to you and copies of receipts for payments received from you, payment number, invoice number, invoice amount, invoice date and if you have purchased an in-app service from an application of Global Bilgi, this includes your invoice and payment details (name, surname, billing address), as well as invoices sent within this scope and examples of receipts for payments received from you, payment number, invoice number, invoice amount, and invoice date.
- **Device Data:** The brand of the device you are using, the device's operating system, the language used on the phone, information about which operator you use, information about the SIM card, and the location information of the device in question; usage data generated in connection with the use of products and services, along with the technical data required for the provision of services,
- **Communication Data:** The type of communication (BiP, SMS, mobile calls, calls to any number/instant messages, etc.), duration of contact, time, type, parties involved, and similar traffic information,
- **Contract Data:** The contract, undertaking and similar documents concluded between you and Global Bilgi, along with the data related thereto, and any other personal data provided in this regard, including your CV and employment contract, if you apply for a job at Global Bilgi.

#### **IV. Purposes of Processing Personal Data:**

Your personal data will be processed in accordance with the Personal Data Protection Law No. 6698 and for the purposes detailed below.

For the purposes of services provided by Global Bilgi, your data may be processed for:

- Recording, problem/error reporting, control, development and execution of operational activities, business development, collections, internal company assessment, customer portfolio management, service quality measurement, managing communication, service analysis, complaint management, and customer satisfaction processes; enabling the transfer of application membership to other devices; the provision, charging and invoicing of products and services; completing and monitoring the transactions you request in relation to the products and services order, purchase and/or use,
- promotion and marketing activities, contacting you regarding these activities, informing you about matters such as campaigns, discounts, benefits, conditions, and pricing; providing with opportunities such as membership and participation in events, and completing the necessary procedures for their use;
- making offers, offering you gifts and promotions, conducting targeted advertising; sending special celebrations, wishes, awards, prize draws and content that you like, may wish to access again, or would be pleased to be reminded of; using the information you provide in this context for the event without the need to collect it again if you participate in a prize draw, competition or similar event,
- Verification of your identity information and documents where necessary; completing the necessary procedures to prevent misconduct, loss, and fraud,
- Business development, marketing, analysis, advertising, profiling, auditing and control, risk management, development of post-sales processes, internal company evaluation, portfolio management, measurement and improvement of service quality, communication, managing complaint handling processes, conducting and developing operational activities, reporting issues/errors and improving service quality based on usage habits, conducting market research using various methods (e-mail, online, IVR, CATI (Computer Aided Telephone Interview), service booster, SMS, etc.), creating a database for use in market and marketing research by conducting statistical analysis using Anonymous Data and avoiding individual identification,
- Retention of your information that must be kept in accordance with the applicable legislation; copying and backing up to prevent loss of information; verification of the consistency of your information, and ensuring that all necessary technical and administrative measures are taken to ensure the security of your information,
- Preparing sectoral reports by conducting evaluations and analyses based on anonymous data,
- Provision of location-based services depending on the settings of the device under your control and if you choose to do so,
- ensuring that the application provides an ideal user experience on the device it will run on and that it works in a manner compatible with the language used when using an application provided/managed by Global Bilgi,

- Sending SMS messages for debt collection purposes,
- Detection of usage patterns and unauthorised and fraudulent usage for the purpose of business development and improving service quality,
- Marketing activities such as product and service diversification, measurement and promotion, the provision of call centre services, financial reporting, legal proceedings, and similar purposes including but not limited to the compliance with legal obligations required or mandated by legal regulations before regulatory and supervisory authorities.

#### **V. Transfer of Personal Data:**

Personal data and new data obtained using personal data may be transferred to the concerned real and legal persons at home and abroad for the purposes of provision of services offered by Global Bilgi, the enhancement of customer experience and satisfaction (including improvement and personalisation), ensuring customer security, detecting fraudulent or unauthorised use, rectifying errors, verifying identity and achieve any of the purposes set out in this Information Notice including but not limited to the purposes specified in this notice pursuant to the law and other legislation.

These are business partners collaborated with and/ or used for outsourcing services for the performance of all kinds of services offered by Global Bilgi, such as software services and other outsourced service providers, hosting service providers, cargo companies, law firms, research companies, software companies related to complaint management and security, agencies, consultancy firms, social media platforms, Global Bilgi group companies/affiliates, supplier companies, banks, financial institutions, the TBB Risk Centre and third parties including but not limited to other natural and legal persons. In addition, personal data may be shared with public institutions and organisations that have duties and powers under the applicable legislation.

In addition, the data subject acknowledges that it is necessary for Global Bilgi to process personal data during and after the use of Global Bilgi services:

- The provision and/or implementation of a service to the data subject,
- Processing being necessary for the purposes of the legitimate interests pursued by Global Bilgi and/or third parties, or protection of the legitimate interests of the data controller;
- Performance of obligations by Global Bilgi in accordance with all applicable legislation;
- Data processing being compulsory for vesting, using, or protecting any right; and situations consented by Data Subject
- Other matters explicitly specified under the legislation.

#### **Transfer of Personal Data Abroad**

Personal data may only be transferred abroad to the extent necessary to achieve the relevant purpose, in accordance with the rules set out in Article 9 "Transfer of Personal Data Abroad" under the Law and the Regulation Regarding the Procedures and Principles on the Transfer of Personal Data Abroad. In this context, personal data may be transferred abroad to the extent required by Global Bilgi's business processes and in accordance with applicable legislation. Data transfer abroad will be made using one of the following methods:

- **Transfer to Countries Providing Adequate Protection:** Data may be transferred to countries deemed to have adequate protection by the Personal Data Protection Board. These countries are announced by the Board.

- **Transfer in Case of Providing Appropriate Assurances** Data transfers to countries that do not provide adequate protection are possible with appropriate assurances and/or the authorisation of the Board. These assurances include standard contractual clauses, binding corporate rules, or commitment methods approved by the Board.
- **Transfer in Exceptional Circumstances:** In case the aforementioned conditions cannot be met, personal data may only be transferred abroad in the following exceptional circumstances:
  - With your explicit consent provided that you are informed about the potential risks.
  - In case the transfer is necessary for the performance of a contract between the data subject and the data controller or for the implementation of pre-contractual measures taken at the request of the data subject.
  - In case the transfer is necessary for the conclusion or performance of a contract between the data controller and another natural or legal person for the benefit of the data subject.
  - In case the transfer is mandatory for an overriding public interest.
  - In case the transfer is necessary for vesting, exercising, or defending of a right.
  - In case the transfer is compulsory for protecting life and physical integrity of a person or any other person in case the relevant person is not able to provide consent due to actual incapabilities or his/her consent is not valid under the applicable law;

## **VI. Rights of a Data Subject Regarding the Protection of Personal Data:**

Pursuant to Article 11 of the Law, you may submit an application to Global Bilgi and exercise your right to:

- Get information as to whether personal data is processed or not;
- Get information on the extent of processing if data are processes;
- Get information on the purpose of processing personal data and as to whether they were used in accordance with the purpose;
- Get information on local and foreign third parties who were transferred personal data;
- Request correction if personal data were processed inaccurately or incompletely;
- Request deletion or destruction of personal data in accordance with the conditions stipulated in the applicable legislation;
- Request notification of deletion, correction and destructions made in accordance with the applicable legislation to third persons;
- Object to a decision being made solely through the automated processing of personal data that adversely affects the individual,
- Claim compensation of losses and damages that may arise from illegal processing of personal data.

## **VII. Duration of Retaining Personal Data:**

Global Bilgi will retain personal data for the period necessary to fulfil the purpose for which it is processed, in accordance with the terms set out in this Information Notice, in order to ensure the best possible use of the service and perform the obligations arising from the nature of the relevant service and the contract. In addition, Global Bilgi shall be entitled to store personal data for the durations specified under the applicable legislation and to the extent required to make defence in case of any dispute that may arise.

**VIII. Amendment of the Information Notice:**

Global Bilgi may revise this Information Notice from time to time: Therefore, we request that you regularly visit [www.global-bilgi.com.tr](http://www.global-bilgi.com.tr) to access the latest version. The revisions in question shall take effect from the date of publication.

**IX. Contact:**

You may submit your inquiries about implementation of the Law and any question regarding your personal data in writing via notary public, registered mail and similar other services to Asmalı Mescit Mahallesi Meşrutiyet Caddesi No: 71 Beyoğlu/İstanbul address or KEP address [globalbilgi@hs03.kep.tr](mailto:globalbilgi@hs03.kep.tr). Global Bilgi may respond to the aforementioned inquiries in writing or through the digital media by specifying positive/negative response together with the reasons thereof.

Essentially, operations in connection with inquiries are carried out free of charge. However, in case costs are incurred in connection with operations, fees may be charged based on tariff determined by Personal Data Protection Authority in accordance with article 13 of Personal Data Protection Law No. 6698.