

## WEBSITE PRIVACY POLICY

The purpose of this Website Privacy Policy is to outline the terms and conditions that apply to the use of personal data provided to Aygaz A.Ş. ("Company") by the users/members/visitors ("Data Subject") of the website [www.aygaz.com.tr](http://www.aygaz.com.tr) ("Site") operated by the Company in connection with the services available on the Site or data generated by the Company during the Data Subject's use of the Site.

**With this Website Privacy Policy, the Data Subject acknowledges that he/she has been informed about the processing of personal data and consents to the use of the same as described herein.**

### What Data is Processed?

This section lists the data types processed by the Company and classified as personal data in accordance with the Law on Protection of Personal Data. Unless otherwise expressly provided herein, "personal data" will include the following in connection with the terms and conditions set forth in this Website Privacy Policy:

- Identity Data (First Name, Surname, Date of Birth)
- Contact Information (E-mail, Cell Phone Number)
- Customer Data (Paro Card Number)
- Customer Transaction Data (IP Address)
- Online Activities
- Data about Candidates Applying for a Job or Internship

The Company can obtain information about the Data Subject's use of the Site through Cookies, which is a technical communication file, and IP information is collected through cookies to track users' patterns of accessing and using the services provided on the Site.

Data that is irreversibly anonymized as per Articles 3 and 7 of the Law on Protection of Personal Data is not "personal data" according to the aforementioned Law and processing of such data will not be subject to the provisions of this Website Privacy Policy.

## **For What Purposes is Data Used?**

The Company may process personal data provided by the Data Subject so that membership procedures can be carried out, to allow members to place orders, to display member-specific Paro Card and activity data, to offer promotions exclusive to members, to perform statistical reporting, and to log online transactions (as per the Law 5651) as well as to improve and enhance the services, notify the Data Subject of the same and perform its obligations arising from the nature of the services offered.

Personal data may be used to contact the Data Subject or enhance the Data Subject's experience with the Site (such as by improving available services, creating new services and offering customized services), and also in connection with the Company's reporting and business development activities, and to perform various statistical evaluations without disclosing the Data Subject's identity, create databases and carry out market research. Personal data may be processed, stored and transmitted to third parties by the Company and its collaborators for direct marketing purposes, and used to contact the Data Subject to send notifications in connection with promotion of various applications, products and services, as well as maintenance and support activities.

The Company may also process and share with third parties personal data without obtaining further consent of the Data Subject under the circumstances described in Articles 5 and 8 of the Law on Protection of Personal Data and/or exceptions in the applicable legislation. Such circumstances may include:

- It is specifically designated by laws,
- It is mandatory in order to protect the life or physical integrity of others or the Data Subject whose consent cannot be obtained due to physical impossibilities or whose consent would not legally be valid,
- It is necessary to process the personal data provided that such processing is directly related to the execution or performance of a contract between the Data Subject and the Company,
- It is mandatory for the fulfillment of legal obligations,
- The data has been made public by the Data Subject,
- Data processing is necessary for the establishment, exercise or protection of a right,
- It is mandatory for the Company's legitimate interest, on the condition that it does not prejudice the Data Subject's fundamental rights and freedoms.

As stated above, the Company may use Cookies and process data and transmit such data to third parties in connection with analysis services provided by third parties only to the extent required by such analysis services. The mentioned technical communication files are small text files sent to the Data Subject's browser by the Site for storage in primary memory. Technical communication files

store the status and preferences settings related to a website, and make it easier to use the Internet. Technical communication files are designed and used to collect statistical information about how many people use a certain website over a certain period of time, for what purpose and how many times a user visits that website and for how long he/she stays online, and to help generate advertisements and content dynamically from pages designed specifically for users. Technical communication files are not designed to acquire any other personal data from primary memory. Many browsers are designed to accept technical communication; however, the users may always change the browser settings not to receive the technical communication file or to get a warning when the technical communication file is sent. The Company also has the right to associate the Data Subject's activities on the site to a cookie stored in browser for the purposes of online behavioral advertising and marketing, and to build remarketing lists based on metrics such as the number of pages viewed, duration of visit and number of targets achieved. Then, targeted advertisements may be displayed to the Data Subject based on his/her interests on the Site or other sites in the visual advertising network.

### **Who Can Access Data?**

The Company may transfer personal data of the Data Subject and data the Company derives from such personal data to third parties from which the Company acquires services to fulfill its commitments to the Data Subject only for the provision of the relevant services.

The Company may share personal data with third parties such as outsourcing service providers, hosting service providers, law offices, research companies and call centers, including those using SMS communications, to enhance the Data Subject's experience (including improvement and customization), ensure the Data Subject's security, detect fraudulent or unauthorized use, conduct operational assessment, correct defects in services provided on the Site or by the Company, and fulfill the purposes outlined in this Website Privacy Policy.

The Data Subject accepts in advance that such third parties may store the Data Subject's personal data in their servers located anywhere in the world only for the purposes mentioned above.

### **The Right to Access Data and Correction Requests**

The Data Subject has the right to make the following requests of the Company:

- Ask for confirmation of whether personal data of the Data Subject is being processed,
- Request information on how personal data is being processed,
- Request information about the purpose of processing of personal data and whether the use of such data conforms to this purpose,

- Request a list of third parties at home or abroad to whom personal data is transferred,
- Request correction of inaccurate or incomplete personal data which is subject to processing,
- Request deletion or destruction of personal data subject to conditions set forth in the applicable legislation,
- Request that third parties to whom personal data is transferred be notified of such correction, deletion or destruction in accordance with applicable legislation,
- Object to conclusions drawn against the Data Subject merely by automated analysis of the processed data,
- Request indemnification of any loss the Data Subject incurs as a result of unlawful processing of personal data.

The Data Subject may make such requests in writing as described in the "Aygaz A.Ş. Personal Data Protection and Processing Policy", which is available on the Site, to the address provided therein. The Company may provide its reasoned positive/negative reply to such requests in writing or in a digital format. Generally, no fee can be charged for the necessary operations related to such requests. Nevertheless, if such operations entail costs, fees may be charged at the rates set by the Board of Protection of Personal Data as per Article 13 of the Law on Protection of Personal Data.

The Data Subject pledges that his/her data subject to this Website Privacy Policy is complete, accurate and up-to-date, and that he/she will update it as necessary when changes occur. The Company assumes no liability as if the Data Subject's data is not current.

The Data Subject acknowledges that he/she may not take full advantage of the services promised by the Company in the event that he/she makes a request that requires the Company not to use his/her personal data, and represents that he/she assumes any liability that may result from such request.

### **Personal Data Retention Period**

The Company may retain personal data provided by the Data Subject to meet its liabilities arising from the nature of the services offered for as long as the Data Subject continues to use our services.

However, in the event of a conflict between the Company and the Subject, the Company may retain the personal data only for the purpose of establishing its defense in connection with such conflict for the limitation periods set forth in the applicable legislation.

## **Measures and Commitments Related to Data Security**

The Company pledges to take the necessary technical and administrative measures and perform necessary inspections to maintain a proper level of security subject to the conditions set forth in the applicable legislation or this Website Privacy Policy in order to

- prevent unlawful processing of personal data,
- avoid unauthorized access to personal data and
- protect personal data.

The Company may not disclose personal data it holds about the Data Subject to others in breach of the provisions of this Website Privacy Policy and the Law on Protection of Personal Data.

In the event that the Site provides links to other applications, the Company assumes no responsibility with respect to the privacy policies and contents of such applications.

## **Changes to the Website Privacy Policy**

The Company may change the provisions of this Website Privacy Policy at any time. The Updated Website Privacy Policy takes effect upon notification of the Data Subject by any means.