

CLARIFICATION TEXT ON THE PROTECTION OF PERSONAL DATA

Pursuant to the Law No. 6698 on the Protection of Personal Data ("LPPD") and other relevant legislation, this information text has been prepared by **ODAK İNŞAAT İNŞAAT MÜHENDİSLİK MADENCİLİK SANAYİ VE TİCARET ANONİM ŞİRKETİ**, which is located at Kozyatağı Mahallesi Şehit Mehmet Fatih Öngül Sokak No: 5/8 Kadıköy İstanbul, in its capacity as Data Controller, in accordance with Article 10 titled "Obligation of the Data Controller to Clarify" and Article 11 titled "Rights of the Relevant Person" in the PDPL, to whom and for what purpose your personal data may be transferred, the method and legal reason for the collection of your personal data, and your other rights listed in Article 11 of the PDPL, and to obtain your consent on the following issues.

Accordingly, your personal data will be recorded, stored, updated in accordance with the law and good faith, disclosed to third parties when permitted by the legislation and/or when applicable for the purpose for which they are processed, classified and processed in the ways listed in the PDPL within the framework described below.

Data Controller

Trade Name: **ODAK İNŞAAT MÜHENDİSLİK MADENCİLİK SANAYİ VE TİCARET ANONİM ŞİRKETİ**

Address: Kozyatağı Mahallesi Şehit Mehmet Fatih Öngül Sokak No: 5/8 Kadıköy İstanbul

1. PURPOSES OF PROCESSING YOUR PERSONAL DATA

Odak İnşaat Mühendislik Madencilik Sanayi Ve Ticaret Anonim Şirketi olarak, Veri Sorumlusu sıfatıyla, başta 6698 sayılı KVKK, 6102 sayılı Türk Ticaret Kanunu, 6502 sayılı Tüketicinin Korunması Hakkında Kanun, 6585 sayılı Perakende Ticareti Korunma Hakkında Kanun ve ilgili ikincil mevzuat ile bunlarla sınırlı olmaksızın diğer sair mevzuat kapsamında vermekte olduğumuz hizmetler, ilgili kişilere ait kişisel ve/veya özel nitelikli kişisel verilerin işlenmesini gerektirmektedir. Müşterilerimizin hizmetlerimizden faydalanabilmesi amacıyla toplanan mezkur kişisel veriler KVKK' nın ilgili maddesi çerçevesinde işlenmektedir.

2. TO WHOM AND FOR WHAT PURPOSE YOUR PROCESSED PERSONAL DATA MAY BE TRANSFERRED

As Odak İnşaat Mühendislik Madencilik Sanayi Ve Ticaret Anonim Şirketi, as Data Controller, the services we provide within the scope of PDPL No. 6698, Turkish Commercial Code No. 6102, Law No. 6502 on the Protection of Consumers, Law No. 6585 on the Protection of Retail Trade and the relevant secondary legislation and other legislation, including but not limited to, require the processing of personal and/or special categories of personal data of the relevant persons. The aforementioned personal data collected in order for our customers to benefit from our services are processed within the framework of the relevant article of the PDPL.

3. METHOD AND LEGAL REASON FOR COLLECTING YOUR PERSONAL DATA

Your personal data may be collected verbally, in writing or electronically by automatic or non-automatic methods, through the Company's affiliated units, website, social media channels, call center, mobile applications and similar means. Your personal data may be processed by creating and updating as long as your relationship with the Company continues and may be kept in both digital and physical environment..

In this direction, upon the collection of explicit consent statements, personal data and / or sensitive personal data obtained through our website will be processed, stored for legal periods in line with the purposes of our services and transferred to third parties if deemed necessary. In this context, You accept and declare that you are aware that your personal information that you have submitted to our Company will be processed in order for you to benefit from products, advantages or campaigns, etc. in line with your needs, to provide general information and to provide all kinds of communication with you, and in this direction, your personal information will be used by our Company to send you information, promotional and marketing messages containing data, audio and video content to be transmitted directly or via SMS, pictures, animations, short messages, MMS containing multimedia objects, telephone, fax, automatic dialing machines, e-mail and similar communication channels, you have the right to refuse to send data, audio, video and all other kinds of messages at any time, completely or on a product and channel basis..

Cookies are small text files that are moved to your hard disk by the web server and then stored on your computer. Cookies help us better understand customer/user behavior during your visit to our website and use of our internet application; it provides information about usage and visit data. Accordingly, your personal or sensitive personal data is not stored in cookies and is not shared with other applications or persons. Finally, in order to fulfill our legal obligations, including our obligations under Labor Law No. 4857, Turkish Code of Obligations No. 6098, Social Security and General Health Insurance Law No. 5510 and Occupational Health Legislation, as well as our obligations under other relevant legislation for security measures, our branches are monitored by closed circuit video system for security reasons. The relevant records are kept within the legal periods in line with the purposes of the related services and, when necessary, are shared with the judicial authorities upon request due to the legal interest of our Company arising from the title of data controller and in cases stipulated by law.

4. DATA PROCESSING PERIOD AND RETENTION PERIOD

Your personal data, limited to the purposes specified in this Clarification Text; It will be processed by complying with the data processing and statute of limitations periods in all relevant laws and other legal legislation to which our Company and the centers and units affiliated to our Company are subject. In case of changes in the laws regarding data processing periods, the new periods determined will be taken as basis.

As a requirement of the principle of purpose limitation, your personal data is processed limited to the fulfillment of the purposes described in this Clarification Text and in any case limited to the period required to be processed in accordance with the legal periods, company practices and customs of commercial life, and after the expiration of the periods, it is deleted, destroyed or anonymized. If you want to get detailed information about the storage periods of your personal data, you can contact us via the addresses in the rights section of the relevant person.

5. RIGHTS OF THE DATA SUBJECT UNDER THE PDPL

Pursuant to Article 11 of the PDPL, you have the following rights regarding your personal data by applying to us;

- Find out if it is being processed,
- Request information if processed,

- Learn the purpose of processing and whether it is used for its intended purpose,
- Knowing the 3rd parties to whom it is transferred domestically / abroad,
- Request correction if incomplete / incorrectly processed, request deletion / destruction within the framework of the conditions stipulated in Article 7 of the KVKK,
- Request notification of the transactions made in accordance with the above-mentioned subparagraphs to the third parties to whom it is transferred,
- Object to the occurrence of a result to your detriment due to analysis exclusively by automated systems,
- Demand compensation for damages in case you suffer damage due to unlawful processing.

As a data subject, you will be able to exercise your rights under Article 11 of the Law regulating the rights of the data subject by submitting your requests in writing to the address "Kozyatağı Mahallesi Şehit Mehmet Fatih Öngül Sokak No: 5/8 Kadıköy İstanbul" or electronically to the e-mail address **info@odakgroup.com.tr** in accordance with the "Communiqué on the Procedures and Principles of Application to the Data Controller.

Your requests in your application will be finalized free of charge as soon as possible and within 30 days at the latest in accordance with Article 13 of the PDPL, depending on the nature of the request. However, if the transaction causes an additional cost for our Company, the fee in the tariff to be determined by the Personal Data Protection Board may be requested.