

CLARIFICATION TEXT OF THE LAW ON THE PROTECTION OF PERSONAL DATA

1. PURPOSE AND SCOPE

As TSRA Training and Consultancy Company (hereinafter referred to as TSRA), we attach importance to the security of your personal data. With this awareness, we show great sensitivity to the preservation of all kinds of personal data belonging to you in the best possible way and with care. With the awareness of this responsibility, we process your personal data within the framework stated below in the capacity of Data Controller within the scope of the Personal Data Protection Law No. 6698 (hereinafter referred to as the Law) and the relevant legislation.

Within the scope of the law, data processing refers to all kinds of operations performed on data such as obtaining, recording, storing, updating, classifying, sharing or transferring your personal data to third parties permitted by the legislation, provided that it is fully or partially automatic or non-automatic, provided that it is a part of any data recording system.

2. COLLECTION, PROCESSING AND PROCESSING PURPOSES OF PERSONAL DATA

In order to provide you with high standards of service, your personal data, depending on the nature of the service provided, within the scope of the purpose stated below;

- To be able to provide the services we offer by the company within the determined legal framework,
- Our company's ability to fulfill its contractual and legal responsibilities completely and accurately,
- Carrying out the necessary work by our business units in order to benefit you from the services offered by our company, customizing our services according to your tastes, usage habits and needs and recommending them to you,
- Ensuring the legal and commercial security of persons who have a business relationship with our company,
- Administrative operations for communication carried out by our company,
- Your evaluation/complaint management processes, reputation research processes, event management, legal compliance process, audit, financial affairs,
- Determining and implementing our company's commercial and business strategies and ensuring the execution of our company's human resources policies,
- In order to continue the training activities of our company

Within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the KVK Law, we obtain your personal data verbally, in writing, visually, or electronically within the scope of the contract or through physical spaces and similar channels. In this context, the main general and special personal data obtained within the framework of the activities carried out by our company and for the above-mentioned purpose are listed below;

- Your identity data such as your name, surname, TR identity number, passport number or temporary Turkish identity number if you are not a Turkish citizen,
- Your contact data such as your address, telephone number, e-mail address,
- Your financial data such as your bank account number, IBAN number,
- Your responses and comments you share while using our services,
- Your training data that you share upon your request in order to benefit from our services effectively,
- Navigation information, IP address, browser information and location data that you voluntarily transmit during the use of our website.

Your personal data listed above and your sensitive personal data may be processed within the scope of the personal data processing conditions specified in Articles 5 and 6 of the KVK Law and for the following purposes:

- To confirm the identity information of those who purchase services through the website/mobile applications,
- To record the information necessary for communication,
- To communicate with our customers about the conditions, current status and updates of the contracts we have concluded under the relevant articles of the Distance Service Agreement and the Law on Consumer Protection, and to provide the necessary information,
- To arrange all records and documents that will be the basis of sales and after-sales support services in electronic environment,
- To fulfill the obligations undertaken in accordance with the contracts we have concluded under the distance service contract and the relevant articles of the Law on Consumer Protection,
- To be able to provide information to public officials on matters related to public security upon request and in accordance with the legislation,
- To provide a better service experience to our customers,
- To improve the quality of our education,
- To increase customer satisfaction,
- To be able to offer suggestions to our customers by our contracted institutions and solution partners, to inform our customers about our services,
- To be able to evaluate customer complaints and suggestions about our services,
- To be able to fulfill our legal obligations and to exercise our rights arising from the current legislation,

The above-mentioned "Personal and Sensitive Personal Data" may be stored in physical and electronic archives within the body of TSRA and external service providers with great care and in accordance with the provisions of the legislation.

3. TRANSFER OF PERSONAL DATA

The sharing of personal data of our customers with third parties takes place within the framework of the consent of the customers and as a rule, personal data is not transferred to third parties without the consent of our customers. However, due to and limited to our legal obligations, personal data is shared with courts and other public institutions. In addition, personal data is transferred to contracted third parties in order to provide the services we undertake and to control the quality of the services provided. Necessary technical and legal measures are taken to prevent violations of rights during data transfer to third parties. However, TSRA is not responsible for violations that occur in the risk area under the responsibility of the third party and due to the data protection policies of the third party receiving personal data. Your personal data, within the framework of the provisions of the Personal Data Protection Law No. 6698, other legislation and for the purposes described above, to our business partners, suppliers, Company officials, shareholders, legally authorized public institutions and private persons, and the following

- General Directorate of Security and other law enforcement agencies,
- Judicial authorities,
- Your legal representatives whom you have authorized,
- Third parties we consult, including lawyers, tax consultants and auditors we work with,
- Regulatory and supervisory institutions and official authorities,

- It can be shared with our suppliers, support service providers, archive service providers and business partners (you can get information by applying to our company in writing for more detailed information) within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the KVK Law.

4. PROTECTION OF PERSONAL DATA

Personal data shared with TSRA is under TSRA's supervision and control. In accordance with the provisions of the relevant legislation in force, TSRA has undertaken the responsibility as data controller to establish the necessary organization and to take and adapt technical measures in order to protect the confidentiality, integrity and accessibility of information. Being aware of our obligation in this regard, penetration tests are carried out periodically in accordance with international and national technical standards on data privacy, and in this context, we always update our data processing policies.

5. METHOD AND LEGAL REASON FOR COLLECTING PERSONAL DATA

Your personal data is collected and processed in all kinds of verbal, written, visual or electronic media in order to carry out all kinds of business within the legal framework for the above-mentioned purposes and the field of activity of TSRA, and in this context, for TSRA to fully and properly fulfill its contractual and legal obligations. The legal reason for the collection of your data is the provisions of other legislation, especially the Law on the Protection of Personal Data No. 6698. You can access our company's Personal Data Protection and Processing Policy, Personal Data Retention and Destruction Policy and Clarification Text on our corporate website.

6. YOUR RIGHTS REGARDING THE PROTECTION OF PERSONAL DATA

In accordance with the law and relevant legislation;

- To learn whether personal data is processed or not,
- If personal data has been processed, requesting information about it,
- Accessing and requesting personal health data,
- To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- To know the third parties to whom personal data is transferred in the country or abroad,
- Requesting correction of personal data in case of incomplete or incorrect processing,
- Requesting the deletion or destruction of personal data,
- In case of incomplete or incorrect processing of personal data, requesting the correction of personal data and/or the deletion or destruction of personal data to be notified to third parties to whom personal data has been transferred,
- Objecting to the occurrence of a result against the person himself by analyzing the processed data exclusively through automated systems,
- In the event that personal data is damaged due to unlawful processing, you have the right to demand the compensation of the damage.

7. DATA SECURITY AND RIGHT OF APPLICATION

Your personal data is meticulously protected within the scope of technical and administrative possibilities, and the necessary security measures are provided at a level appropriate to possible risks, taking into account technological possibilities. Pursuant to paragraph 1 of Article 13 of the KVK Law, you can submit your request to exercise your above-mentioned rights to our Company in writing or by other methods determined by the Personal Data Protection Board. In order to exercise your above-mentioned rights, you can submit your request, which includes the necessary information identifying your identity and your explanations regarding your right that you want to exercise from the rights specified in Article 11 of the

KVK Law, by filling out the "Application Form in Accordance with the Personal Data Protection Law" on our website; contact address.