

ATA HOLDİNG ANONİM ŞİRKETİ
INFORMATION NOTICE

1. Data Controller

In accordance with the Turkish Personal Data Protection Law No.6698 ("**the Law**"), your personal data is processed by Ata Holding Anonim Şirketi ("**Ata Holding**" or the "**Company**") as data controller.

2. Methods of Collecting Your Personal Data, Purposes of Processing, Legal Basis, and Transfers

IF YOU CONTACT US BY PHONE			
Phone Call Processes			
Personal Data	Purpose of Processing	Legal Basis	Method of Collection
Identity Information (Name, Surname) Contact Information (Phone number, e-mail address) Audio Records (Voice Recordings)	<ul style="list-style-type: none">- Evaluation, resolution, and finalization of your requests, complaints, and suggestions- Conducting satisfaction processes- Managing internal company processes regarding sustainability reports	Processing of data is necessary for the legitimate interests pursued by the data controller	Collected partially through automated means via phone call recordings
The personal data processed in this process may be transferred to our group companies, affiliated companies managed by the same individuals, and legal advisors from whom we receive services, based on the purpose of legal proceedings and the condition of "necessity for the legitimate interests of the data controller." Additionally, if subject to a legal dispute and/or requested by public institutions and organizations in accordance with the law, such data may be transferred to authorized public institutions and organizations based on the legal basis of "necessity for compliance with a legal obligation."			
VISITORS			
Visitor Registration Processes			
Personal Data	Purpose of Processing	Legal Basis	Method of Collection
Identity Information (Name, Surname) Contact Information (Phone number) Physical Security (Visit Information)	<ul style="list-style-type: none">- Ensuring physical space security- Maintaining visitor records	Processing of data is necessary for the legitimate interests pursued by the data controller	Collected partially through automated means via visitor logbook
The personal data processed in this process may be transferred, based on the same purposes and legal basis, to our suppliers from whom we receive services in this regard; to our group companies, affiliated companies managed by the same individuals, and legal advisors from whom we receive services, for the purpose of pursuing and conducting legal affairs and based on the legal basis of " Processing of data is necessary for the legitimate interests pursued by the data controller ."Additionally, the relevant data may be transferred to authorized public institutions and organizations in the event that they			

become the subject of a legal dispute and/or are lawfully requested by public authorities, on the legal basis of “necessity for compliance with a legal obligation.”

Security Camera Recordings

Personal Data	Purpose of Processing	Legal Basis	Method of Collection
Physical Security (CCTV Recordings)	Ensuring physical space security	Processing of data is necessary for the legitimate interests pursued by the data controller	Collected partially or fully via automated means through security cameras at the company

The personal data processed in this process may be transferred, based on the same purposes and legal basis, to our suppliers from whom we receive services in this regard; to our group companies, affiliated companies managed by the same individuals, and legal advisors from whom we receive services, for the purpose of pursuing and conducting legal affairs and based on the legal basis of “Processing of data is necessary for the legitimate interests pursued by the data controller .” Additionally, the relevant data may be transferred to authorized public institutions and organizations in the event that they become the subject of a legal dispute and/or are lawfully requested by public authorities, on the legal basis of “necessity for compliance with a legal obligation.”

ONLINE USERS

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BUSINESS PARTNER / SUPPLIER REPRESENTATIVES AND EMPLOYEES

Contract Processes

Personal Data	Purpose of Processing	Legal Basis	Method of Collection
Identity Information <i>(Name, Signature, ID Number, Info on ID, Signature Circular, Tax Number)</i> Contact Information <i>(Phone, Address, Email address, Fax number)</i> Financial Information <i>(Balance Sheet, Financial Performance Information)</i> Personnel Information <i>(Title, Position, and Employer Corporation)</i>	<ul style="list-style-type: none"> - Managing contract processes - Establishment and review of contract - Providing legal opinions when necessary 	Processing personal data of the parties of a contract is necessary	Provided by you during business relations with our company (partially automated or manual)

In the event that your personal data processed during this process becomes the subject of a legal dispute and/or is lawfully requested by public institutions and organizations, it may be transferred: (i) to authorized public institutions and organizations based on the following condition “Necessity for compliance with a legal obligation.” and (ii) to our group companies, affiliated companies managed by the same individuals, and legal advisors from whom we receive services, for the purpose of pursuing and conducting legal affairs, based on the legal basis of “necessity for compliance with a legal obligation.”

Finance-Accounting Processes			
Personal Data	Purpose of Processing	Legal Basis	Method of Collection
Identity Information <i>(Name, Surname, Signature, ID Number, Tax Number)</i> Financial Information <i>(Bank Account, IBAN, Bond Info, Letter of Guarantee, Check Info, Invoice Info, Reconciliation Data, Tax Plate, Trade Registry Info, Activity Certificate)</i> Contact Information <i>(Phone, Address, Email address, Fax number)</i>	<ul style="list-style-type: none"> - Processing payments - Reconciliation of current accounts - Billing and tracking receivables/payables - Fulfilling legal obligations - Managing accounting and financial processes - E-archive and e-invoice processes 	<ul style="list-style-type: none"> - Expressly provided for by the laws. - It is necessary for compliance with a legal obligation to which the data controller is subject. 	Provided during business relations with our company (partially automated or manual)
The personal data processed in this process may be transferred based on the legal basis of “being necessary for the legitimate interests of the data controller” to: (i) the banks we receive services from, for the purpose of processing payments, (ii) the accounting, finance, and tax consultants we work with, for the purpose of managing accounting and financial affairs, and (iii) our group companies, affiliated companies managed by the same individuals, and legal advisors from whom we receive services, for the purpose of pursuing and conducting legal affairs. In addition, your personal data will be transferred to public institutions and organizations for the purpose of fulfilling our legal obligations and based on the relevant legal basis.			
Communication Processes			
Personal Data	Purpose of Processing	Legal Basis	Method of Collection
Identity Information <i>(Name, Surname, Signature)</i> Contact Information <i>(Phone, Address, Email address)</i> Personnel Information <i>(Role, Title, Position, and Employer Corporation)</i>	<ul style="list-style-type: none"> - Business and communication management - Planning and execution of corporate communication activities 	<ul style="list-style-type: none"> - Processing of data is necessary for the legitimate interests pursued by the data controller - Processing of personal data of the parties of a contract is necessary 	Provided during business relations with our company (partially automated or manual)
The personal data processed in this process may be transferred, for the same purposes, to our group companies and affiliated companies managed by the same individuals, based on the legal basis of “being necessary for the legitimate interests of the data controller.			

Business and Project Processes			
Personal Data	Purpose of Processing	Legal Basis	Method of Collection
Identity Information <i>(Name, Surname,)</i> Contact Information <i>(E-mail address)</i> Personnel Information <i>(Role, Title, Position, and Employer Corporation)</i> Transaction Security Information <i>(Username, records of actions performed on the application, log records)</i> Other <i>(Project-specific Info and Activities)</i>	<ul style="list-style-type: none"> - Executing necessary projects and operations within the scope of business processes - Monitoring, managing, and executing sustainability projects 	<ul style="list-style-type: none"> - Processing of data is necessary for the legitimate interests pursued by the data controller - Processing of personal data of the parties of a contract is necessary 	Provided during business relations with our company (partially automated or manual)
The personal data processed in this process may be transferred, for the same purposes, to our group companies and affiliated companies managed by the same individuals, based on the legal basis of "being necessary for the legitimate interests of the data controller.			
Legal and Audit Processes			
Personal Data	Purpose of Processing	Legal Basis	Method of Collection
Identity Information <i>(Name, Signature, ID Number, Info on ID, Signature Circular, Tax Number)</i> Contact Information <i>(Phone, Address, Email address, Fax number)</i> Financial Information <i>(Balance Sheet, Financial Performance, Bank Info, IBAN, Bonds, Guarantees, Checks, Invoices, Reconciliation, Tax Info, Trade Registry, Activity Certificate)</i> Personnel Information <i>(Role, Title, Position, and Employer Corporation)</i> Transaction Security Information <i>(Username, Activity Log records)</i>	<ul style="list-style-type: none"> - Fulfilling legal obligations arising from legislation - Establishment/termination/cancellation of contractual relationships - Meeting obligations towards authorized institutions - Exercising legal rights in case of disputes - Managing negotiation and resolution of disputes - Retaining documents required under legal regulations - Providing requested information - Conducting reporting and audit activities 	<ul style="list-style-type: none"> - It is necessary for compliance with a legal obligation to which the data controller is subject. - Data processing is necessary for the establishment, exercise or protection of any right. - Processing of personal data of the parties of a contract is necessary - Processing of data is necessary for the legitimate interests pursued by the data controller 	Provided during business relations with our company (partially automated or manual)

Legal Transaction Info <i>(Correspondence with Judicial Authorities, Case Details, Signature, Signature Circular)</i> <i>Diğer</i> Contract Information: <i>(Party details that may be included in contracts, full name, signature, Turkish ID number, information on the identity document, signature circular details, tax number)</i>			
- The personal data processed in this process may be transferred, based on the legal basis of “Processing of data is necessary for the legitimate interests pursued by the data controller”; (i) to the tax consultants from whom we receive services for the purpose of carrying out tax processes, and (ii) to our group companies, affiliated companies managed by the same real persons, and legal consultants from whom we receive services for the purpose of conducting and following up legal affairs. In addition, your personal data may also be transferred to public institutions and organizations based on the purpose and legal basis of fulfilling our legal obligations.			
COMPANY SHAREHOLDER / COMPANY SHAREHOLDER REPRESENTATIVES / MEMBERS OF THE BOARD OF DIRECTORS			
Corporate Governance Processes			
Personal Data	Purpose of Processing	Legal Basis	Method of Collection
Identity Information <i>(Name-surname, gender, mother's name, father's name, Turkish ID number, nationality, other identity information)</i> Contact Information <i>(Email address, residential address, mobile phone number, (if any) Registered Electronic Mail (REM) address)</i> Visual Records <i>(Photograph)</i> Personnel Information <i>(Title, position)</i> Legal Transaction Information <i>(Power of attorney information, manner,</i>	- Issuance of power of attorney and signature circulars for individuals to whom power of attorney or signing authority will be granted by the company - Conducting the preparation of signature circulars - Conducting and supervision of business activities - Monitoring and management of legal affairs	- Processing of data is necessary for the legitimate interests pursued by the data controller - Data processing is necessary for the establishment, exercise or protection of any right.	Through verbal communication or email from you, and through the use of existing data in company systems (partially automated and non-automated means)

<i>form, and duration of granted authority)</i>			
The personal data processed in this process may be transferred, based on the legal basis of “Processing of data is necessary for the legitimate interests pursued by the data controller,” to: (i) tax consultants from whom we receive services for the purpose of executing tax processes, (ii) our group companies, affiliated companies managed by the same real persons, and legal consultants from whom we receive services for the purpose of conducting and following up legal affairs. In addition, such personal data may be transferred to public institutions and organizations based on the purpose and legal basis of fulfilling our legal obligations.			
Board of Directors and General Assembly Meetings Processes			
Personal Data	Purpose of Processing	Legal Basis	Method of Collection
Identity Information <i>(Name-surname, gender, mother's name, father's name, Turkish ID number, nationality, other identity information)</i> Contact Information <i>(Email address, residential address, mobile phone number, (if any) REM address)</i> Visual Records <i>(Photograph)</i> Personnel Information <i>(Title, position)</i> Legal Transaction Information <i>(Power of attorney information, manner, form, and duration of granted authority)</i>	- Preparation of board and general assembly resolutions, - Execution of signature processes - Execution of registration processes before trade registry offices - Conducting activities in accordance with legislation - Monitoring and management of legal affairs	- It is necessary for compliance with a legal obligation to which the data controller is subject. - Data processing is necessary for the establishment, exercise or protection of any right.	Via your submission and/or directly from you within the scope of Board of Directors and General Assembly meetings (partially automated and non-automated means)
The personal data processed in this process may be transferred, based on the legal basis of “Processing of data is necessary for the legitimate interests pursued by the data controller” to: (i) tax consultants from whom we receive services for the purpose of executing tax processes, (ii) our group companies, affiliated companies managed by the same real persons, and legal consultants from whom we receive services for the purpose of conducting and following up legal affairs, and (iii) independent audit firms from whom we receive services for the purpose of conducting audit processes. In addition, such personal data may be transferred to public institutions and organizations based on the purpose and legal basis of fulfilling our legal obligations.			

3. Your Rights Regarding Your Personal Data

We would like to remind you that under Article 11 of the Law on the Protection of Personal Data (KVKK), you have the following rights:

- To learn whether his/her personal data are processed or not,
- To demand information as to if his/her personal data have been processed,

- to learn the purpose of the processing of his/her personal data and whether these personal data are used in compliance with the purpose,
- to know the third parties to whom his personal data are transferred in country or abroad,
- to request the rectification of the incomplete or inaccurate data, if any,
- to request the erasure or destruction of his/her personal data under the conditions referred in the Law.
- To request that the correction, deletion, or destruction operations made in accordance with the relevant legislation be notified to third parties to whom your personal data has been transferred,
- To object to the occurrence of a result against you by analyzing your processed personal data exclusively through automated systems,
- To demand the compensation of the damage in case you suffer damage due to unlawful processing of your personal data.

You can submit your requests regarding the above-mentioned rights to our Company by filling out the [Data Subject Application Form](#), which can be accessed at www.ataholding.com.tr, or by sending an email to kvkk@ataholding.com.tr, in accordance with the Communiqué On The Principles And Procedures For The Request To Data Controller. Your application will be concluded free of charge as soon as possible and within thirty days at the latest, depending on the nature of your request. If the process requires an additional cost, you may be charged a fee according to the tariff determined by the Personal Data Protection Board.