

1. Introduction

Pursuant to Article 20 of the Constitution of the Republic of Turkey, everyone has the right to demand the protection of personal data concerning him/her. This right includes the right to be informed about personal data related to oneself, to access such data, to request their correction or deletion, and to learn whether they are used for their intended purposes.

Law No. 6698 on the Protection of Personal Data ("**KVK Law**") regulates the protection of fundamental rights and freedoms of individuals in the processing of personal data and the obligations of real and legal persons who process personal data and the procedures and principles to be followed. The purpose of this Policy prepared in this direction is to ensure compliance with the obligations regarding the PDP Law regulations.

The protection of personal data of Employee Candidates, Customers, Prospective (Potential) Customers, Company Shareholders, Company Officials, Visitors, Employees, Shareholders and Authorities of the Institutions we are in cooperation with and Third Parties is managed by the Policy.

The protection of personal data of our employees is managed under the Derindere Employees Personal Data Protection and Processing Policy, which is written in parallel with the principles in this Policy.

In case of any conflict between the KVK Law and other relevant legislation and Derindere Personal Data Protection and Processing Policy, the legislation in force shall apply.

2. Purpose

Derindere Turizm Otomotiv Sanayi ve Ticaret A.Ş. ("**Derindere**") Personal Data Protection and Processing Policy ("**Policy**") has been prepared in order to protect the fundamental rights and freedoms of individuals, especially the privacy of private life, and to regulate the obligations of real and legal persons who process personal data and the procedures and principles to be followed.

With the Policy, it has been adopted to maintain and develop the activities carried out by Derindere in accordance with the principles set out in the KVK Law.

3. Scope

Data subjects whose personal data are processed within the scope of this Policy are categorized as follows:

Employee Candidates	Natural persons who make their CV and related information accessible to Derindere by applying for a job or by any other means
Former Employees	Former employees whose employment with Derindere ended
Customers	Real persons whose personal data are obtained due to business relations within the scope of the activities carried out by Derindere, regardless of whether there is any contractual relationship

Prospective Client	Natural persons who apply to Derindere and request an offer, request offer revisions and alternative brand and model prices, and share personal data with Derindere only for the purpose of obtaining an offer without a contractual relationship
Visitors	Natural persons who have entered Derindere's physical facilities for various purposes or visited the websites
Third Parties	Other natural persons, including but not limited to guarantors, family members, etc., whose personal data are processed within the framework of this Policy, although not defined in the Policy

4. Definitions

The definitions used in this Policy are given below:

Explicit consent	Consent on a specific subject, based on information and expressed with free will
Anonymization	Making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even by matching with other data
Employee	All natural persons who are dependent on Derindere for a definite or indefinite period of time
Employee candidate	Real persons who make their CV and reference information accessible to Derindere by applying for a job or by any other means
Employee Data Subject Application Form	The application form to be used by Derindere employees while using their applications regarding their rights described in Article 11 of the KVK Law as personal data owners
Personal health data	Any health information relating to an identified or identifiable natural person
Personal data	Any information relating to an identified or identifiable natural person

Processing of personal data	Any kind of processing performed on personal data such as obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or by non-automatic means provided that it is part of any data recording system
KVK Law	Law No. 6698 on the Protection of Personal Data
KVK Board	Personal Data Protection Board
KVK Authority	Personal Data Protection Authority
Sensitive personal data	Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data
TCK	Turkish Penal Code No. 5237
Data processor	A natural or legal person who processes personal data on behalf of the data controller based on the authorization granted by the data controller
Personal data subject	The real person whose personal data is processed, who is considered as "data subject" in the KVK Law
Data Subject Application Form	The application form to be used by personal data owners whose personal data are processed within Derindere while using their applications regarding their rights described in Article 11 of the KVK Law
Data Controller	The natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system
Data Controllers Registry	Registry of data controllers kept by the Personal Data Protection Board
Data Inventory	The inventory that Derindere creates and details the personal data processing activities that Derindere carries out depending on its

	business processes by associating them with the personal data processing purposes, the recipient group to which personal data is transferred and the relevant personal data owner group
--	---

5. General Principles Regarding the Processing of Personal Data

Pursuant to Article 3 of the KVK Law, all kinds of operations performed on personal data such as obtaining, recording, storing, retaining, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or by non-automatic means provided that they are part of any data recording system fall within the scope of processing personal data.

The following principles must be complied with in the processing of personal data:

Compliance with the law and good faith

Our Company carries out its personal data processing activities in accordance with the law and honesty rules in accordance with the PDP Law and the relevant legislation, especially the Constitution.

Being accurate and up-to-date when necessary

All kinds of administrative and technical measures are taken by our Company to ensure the accuracy and timeliness of personal data while carrying out the processing of personal data.

Processing for specific, explicit and legitimate purposes

Our Company clearly and precisely determines its legitimate purpose for processing personal data before starting the processing of personal data.

Being relevant, limited and proportionate to the purpose for which they are processed

Personal data are processed by our Company as long as necessary to fulfill the specified purposes. Data processing activities are not carried out with the assumption that they can be used later.

Retention for the period stipulated in the relevant legislation or required for the purpose for which they are processed

Our Company stores personal data limited to the period stipulated in the KVK Law and the relevant legislation or as required by the purposes of the data processing activity.

6. Terms of Processing Personal Data

Our Company may process personal data and sensitive personal data with the explicit consent of the personal data owner or without explicit consent in cases stipulated in Articles 5 and 6 of the KVK Law.

6.1. Processing of Personal Data

As a rule, our Company processes your personal data based on your explicit consent. However, it carries out its personal data processing activities in accordance with the data processing conditions set forth in Article 5 of the KVK Law without seeking your explicit consent:

- It is explicitly stipulated in the laws.

- It is mandatory for the protection of the life or physical integrity of the person himself/herself or of another person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid.
- Provided that it is directly related to the establishment or performance of a contract, it is necessary to process personal data belonging to the parties to the contract.
- It is mandatory for our company to fulfill its legal obligation.
- It has been made public by the personal data owner himself/herself.
- Data processing is mandatory for the establishment, exercise or protection of a right.
- Data processing is mandatory for the legitimate interests of our Company, provided that it does not harm the fundamental rights and freedoms of the personal data owner.

6.2. Processing of Special Categories of Personal Data:

Our Company carries out the processing of personal data of special nature, which carries the risk of discrimination when processed unlawfully, in accordance with the data processing conditions set forth in Article 6 of the KVK Law. In addition, it is also essential to take adequate measures determined by the PDP Board in the processing of special categories of personal data. It is prohibited to process sensitive personal data without the explicit consent of the personal data owner. However, in the following cases, special categories of personal data may be processed without the explicit consent of the personal data owner:

Processing of Personal Health Data:

Personal health data may be processed in the presence of one of the conditions listed below, provided that (i) taking adequate measures to be stipulated by the Ministry of Health, (ii) acting in accordance with general principles, (iii) being under the obligation of confidentiality:

- Written explicit consent of the personal data subject
- Protection of public health
- Preventive medicine
- Carrying out medical diagnosis, treatment and care services,
- Planning and management of health services and financing

Processing of Sensitive Personal Data Other Than Health and Sexual Life

Data within this scope will be possible with the explicit consent of the personal data owner or in cases stipulated by law.

6.3. Categorization of Personal Data Processed by Our Company

Categories of Personal Data Processed by Derindere

Personal Data Category	Description	Category of Data Subject to Which the Relevant Personal Data Relates
Identity Information	All information contained in documents such as driver's license, identity card, residence, including but not limited to name-surname, Turkish ID number, nationality, parents' name, place of birth, date of birth, gender and Social Security number	Third Parties, Customers, Prospective Customers, Potential Customers Requesting Offers via the Website, Suppliers, Visitors, Employee Candidates
Contact Information	Information such as phone number, address, e-mail, fax number	Customers, Employee Candidates, Visitors, Suppliers, Prospective Customers, Potential Customers Requesting Proposals via the Website
Customer Information	Information obtained and produced about the relevant person as a result of our commercial activities and the operations carried out by our business units within this framework	Customers
Customer Transaction Information	Records regarding the use of our products and services and information such as the customer's instructions and requests required for the use of products and services	Customers
Transaction Security Information	Personal data processed to ensure technical, administrative, legal and commercial security during the execution of Derindere's commercial activities	Customers, Visitors, Suppliers, Prospective Customers, Potential Customers Requesting Proposals via Website
Risk Management Knowledge	Personal data processed through methods used in accordance with generally accepted legal, commercial practices and good faith in these areas	Customers, Visitors, Suppliers, Prospective Employees, Prospective Customers

	in order to manage our commercial, technical and administrative risks	
Financial Information	Personal data processed regarding information, documents and records showing all kinds of financial results created according to the type of legal relationship established with the personal data owner	Customers, Prospects, Suppliers
Employee Candidate Information	Personal data processed about individuals who have applied to become an employee of Derindere or who have been evaluated as an employee candidate in line with the human resources needs of our company in accordance with the commercial custom and honesty rules or who are in a working relationship with Derindere.	Employee Candidates
Legal Procedure and Compliance Knowledge	Personal data processed within the scope of determination and follow-up of our legal receivables and rights and performance of our debts	Customers, Employee Candidates, Suppliers, Third Parties
Audit, Inspection and Compliance Information	Personal data processed within the scope of Derindere's legal obligations and compliance with company policies	Customers, Prospective Employees, Visitors, Suppliers
Sensitive Personal Data	As stated in Article 6 of the KVK Law; data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data, Blood group, health information, religion	Customers, Derindere Employees, Employee Candidates, Third Parties
Marketing Knowledge	Personal data processed for the marketing of our products and services by customizing them in line with the	Customers, Prospects

	usage habits, tastes and needs of the personal data owner, and the reports and evaluations created as a result of these processing results	
Request / Complaint Management Information	Personal data regarding the receipt and evaluation of any request or complaint addressed to Derindere.	Customers, Prospective Customers, Prospective Employees, Visitors, Third Parties

7. Ensuring the Security and Confidentiality of Personal Data

In accordance with Article 12 of the KVK Law, our Company takes all necessary technical and administrative measures to prevent unlawful processing and access to the personal data it processes and to ensure the appropriate level of security to ensure the protection of personal data.

7.1. Technical Measures Taken to Ensure Lawful Processing of Personal Data and Prevent Unlawful Access

- Taking technical measures as far as technology allows
- Employment of experts in technical fields
- Auditing the implementation of the measures taken at regular intervals
- Establishing the necessary software and infrastructure to ensure security
- Restricting access to the data being processed within the Company
- Use of a backup program in accordance with the law to ensure that personal data is stored securely
- Use of software that includes virus protection systems

Derindere has taken all kinds of technical and technological security measures to protect your personal data and has taken your personal data under protection against possible risks.

7.2. Administrative Measures Taken to Ensure Lawful Processing of Personal Data and Prevent Unlawful Access

- Training and raising awareness of company employees regarding the PDP Law,
- In cases where personal data transfer is in question, ensuring that a record is added to the contracts concluded with the persons to whom personal data is transferred that the party to whom personal data is transferred will fulfill data security,
- Determining the requirements to be fulfilled for compliance with the PDP Law and preparing internal policies for their implementation,

7.3. Measures to be Taken in Case of Unlawful Disclosure of Personal Data

In the event that the processed personal data is obtained by others illegally despite the necessary security measures taken, our Company will notify the relevant data owner and the PDP Board as soon as possible.

8. Purposes of Processing Personal Data and Retention Periods

8.1. Purposes of Processing Personal Data

Personal data are processed by our Company for the purposes listed below:

- Sale and rental of new and used vehicles,
- Fulfillment of after-sales services such as but not limited to maintenance, repair, damage follow-up, road assistance,
- Provision of spare/replacement vehicles,
- Provision of insurance and financing services, financial background checks, including the determination of your credit rating, making offers and other actions necessary for the performance of the contract and the performance of the business,
- If you request a loan, providing the necessary information for the loan in cooperation with the banks,
- Performing the necessary procedures for the collection of our receivables, including but not limited to mail order,
- Issuing invoices for our services and sending e-archive invoices to the e-mail addresses you have sent to us,
- Obtaining technological services on issues that are not directly provided by us and are not in our field of expertise,
- Financial reconciliation with our business partners and/or third parties regarding our products and services,
- Provision of call center service,
- Execution of processes regarding employee candidates,
- Execution/follow-up of financial reporting and risk management processes,
- Execution/follow-up of legal affairs and transactions,
- Realization of company and partnership law transactions,
- Planning and execution of the necessary audit activities to ensure that the activities are carried out in accordance with the Company's procedures and relevant legislation,
- Providing information to authorized institutions and organizations due to legislation,
- Planning and execution of corporate sustainability activities,
- Carrying out activities to protect the reputation of our company,
- Management of request (including leads' request for proposal) and complaint processes,
- Planning and execution of corporate governance and communication activities,
- Creation and follow-up of visitor records.

8.2. Retention Periods of Personal Data

Our Company determines whether a period of time is stipulated in the relevant legislation for the storage of personal data. If a period is stipulated in the relevant legislation, it complies with this period; If a period is not stipulated, it retains personal data for the period required for the purpose for which they are processed. If the purpose of processing personal data has expired and the retention periods determined by the relevant legislation and / or our Company have expired, it can only be stored in order to constitute evidence in possible legal disputes, to assert the relevant right related to personal data or to establish a defense. Personal data are not stored by our Company based on the possibility of future use.

9. Deletion, Destruction and Anonymization of Personal Data

Pursuant to Article 7 of the KVK Law, although personal data has been processed in accordance with the relevant legislation, personal data shall be deleted, destroyed or anonymized by our Company ex officio or upon the request of the personal data owner if the reasons requiring its processing disappear.

The procedures and principles regarding this matter will be fulfilled in accordance with the KVK Law and the secondary legislation that will form the basis of this Law.

9.1. Techniques for Deletion and Destruction of Personal Data

For example: physical destruction, secure deletion from software, secure deletion by an expert...

9.2. Techniques for Anonymization of Personal Data

It refers to making personal data in such a way that it cannot be associated with an identified or identifiable natural person under any circumstances, even by matching it with other data.

Example: masking, data derivation, pseudonymization, aggregation, data hashing...

10. Third Parties to whom Personal Data is Transferred and Purposes of Transfer

The procedures and principles to be applied in personal data transfers are regulated in Articles 8 and 9 of the KVK Law, and the personal data and sensitive personal data of the personal data owner can be transferred to third parties in Turkey and abroad. In order to fulfill its services, your personal data may be transferred to third parties in Turkey and abroad in accordance with the Law and other legislation (including but not limited to the Identity Notification Law No. 1774, Highway Traffic Law No. 2918, Insurance Law No. 5684, Consumer Protection Law No. 6502 and other regulations related to these laws, regulations of supervisory and regulatory institutions and organizations, and cases required by public authorities), Personal data may be processed by Derindere and may be shared with Derindere's group companies, Derindere's infrastructure providers, third parties from whom Derindere receives services, DRD dealers, insurance companies, banks/financing companies, services and contracted institutions for the realization of after-sales services, organizations providing road assistance services, collection receivable companies for the collection of receivables, real and legal persons with whom we have a proxy relationship, our business partners and other third parties. However, in any case, except in exceptional cases, personal data cannot be transferred without the explicit consent of the personal data owner.

10.1. Domestic Transfer of Personal Data

In accordance with Article 8 of the KVK Law, the transfer of personal data domestically will be possible provided that one of the conditions specified in section 6 of this Policy titled "Conditions for Processing Personal Data" is met.

10.2. Transfer of Personal Data Abroad

In accordance with Article 9 of the KVK Law, in case personal data is transferred abroad, in addition to the fulfillment of the conditions regarding domestic transfers, the existence of one of the following issues is sought:

- The country to which the transfer will be made is counted among the countries with adequate protection announced by the PDP Board
- If there is no adequate protection in the country of transfer, the data controllers in Turkey and the relevant foreign country undertake in writing to provide adequate protection and the permission of the PDP Board is obtained

10.3. Groups of Persons to whom Personal Data are Transferred by our Company

Our Company may transfer the personal data of personal data owners who are within the scope of this Policy in accordance with Articles 8 and 9 of the KVK Law and within the scope of the purposes specified in Article 10 to the following groups of persons:

Personal data may be transferred by our Company to our Companies, Company officials, subsidiaries, affiliates, business partners, suppliers, shareholders, legally authorized public institutions and organizations and private institutions for the purposes stated above in Article 10.

11. Our Company's Disclosure Obligation

In accordance with Article 10 of the KVK Law, personal data owners must be informed during the collection of personal data. In this context, our Company fulfills its disclosure obligation on the following issues:

- Title of our Company as the data controller
- The purpose for which personal data will be processed
- To whom and for what purpose the processed personal data can be transferred
- The method and legal grounds for collecting personal data,
- The rights of the personal data owner specified in section 12.1 of this Policy titled "Right to Apply"

12. Rights of Personal Data Subjects and Exercise of These Rights

In accordance with Article 13 of the KVK Law, the evaluation of the rights of personal data owners and the necessary information to personal data owners are carried out through [Derindere Data Owner Application Form](#) as well as this Policy. Personal data owners may submit their complaints or requests regarding the processing of their personal data to us within the framework of the principles specified in the relevant form.

12.1. Right to Apply

Pursuant to Article 11 of the KVK Law, anyone whose personal data is processed may apply to our Company and make requests regarding the following issues related to him/her:

- Learn whether their personal data is being processed,

- Request information if their personal data has been processed,
- To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- To learn the third parties to whom personal data are transferred domestically or abroad,
- To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- To request the deletion, destruction or anonymization of personal data in the event that the reasons requiring the processing of personal data disappear and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- To object to the occurrence of a result to the detriment of the data subject by analyzing the processed data exclusively through automated systems,
- In case of damage due to unlawful processing of personal data, to demand compensation for the damage.

12.2. Situations Excluded from the Scope of the Right to Apply

Pursuant to Article 28 of the KVK Law, it will not be possible for personal data owners to assert their rights in the following cases:

- Processing of personal data by natural persons within the scope of activities related to themselves or their family members living in the same residence, provided that their personal data is not disclosed to third parties and the obligations regarding data security are complied with
- Processing of personal data for purposes such as research, planning and statistics by anonymizing them with official statistics.
- Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public security, public safety, public order, economic security, privacy of private life or personal rights or does not constitute a crime.
- Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public security, public order or economic security.
- Processing of personal data by judicial authorities or execution authorities in relation to investigation, prosecution, trial or execution procedures.

Pursuant to paragraph 2 of Article 28 of the KVK Law, data owners will not be able to assert the rights of personal data owners, except for the right to demand compensation for the damage:

- Processing of personal data is necessary for the prevention of crime or criminal investigation.
- Processing of personal data made public by the data subject himself/herself.
- Processing of personal data is necessary for the execution of supervisory or regulatory duties or disciplinary investigation or prosecution by authorized public institutions and organizations and

professional organizations in the nature of public institutions based on the authority granted by law.

- Personal data processing is necessary for the protection of the economic and financial interests of the State in relation to budget, tax and financial matters.

12.3. Response Procedure

In accordance with Article 13 of the KVK Law, our Company will finalize the application requests made by the personal data owner free of charge as soon as possible and within 30 (thirty) days at the latest, depending on the nature of the request. In accordance with Article 13 of the KVK Law, your application must be submitted to our Company in writing or by other methods determined by the KVK Board.

The application of the personal data subject may be rejected in the following cases

- Preventing the rights and freedoms of other persons
- Requires disproportionate effort
- The information is publicly available
- Compromise the privacy of others
- Existence of one of the situations excluded from the scope pursuant to the KVK Law

13. Personal Data Processing Activities Conducted within the Company and Data Processing Activities Conducted on the Website

13.1. Camera Surveillance Inside the Company

Camera surveillance is carried out within our Company in order to protect the interests of our Company and other persons regarding ensuring the security of our Company and other persons.

In line with the regulations in the KVK Law, this Policy is published on our website regarding the camera surveillance activity by our Company.

There is no monitoring in areas that may result in interference with the privacy of the person. Security camera recordings can only be accessed by a limited number of our Company employees and, if necessary, employees of the security company that acts as a supplier. The persons who have access to the records declare that they will protect the confidentiality of the data they access with the confidentiality undertaking they have signed.

13.2. Entry and Exit of Customers Visiting the Company

Personal data processing activities are carried out to track the entry and exit of our guests who visit our company. While obtaining the name and surname information of the persons who come to our company, the data in question are processed only for this purpose and the relevant personal data are recorded in the recording system in physical environment.

13.3. Website Visitors

Internet movements within the site are recorded (by technical means, for example, cookies) in order to show customized content and to carry out online advertising activities in accordance with the

purpose of the visit of the people who visit the website of our company. Detailed explanations regarding these activities of our company are included in the Privacy Policies texts on our website. You can access Derindere Cookie Policy [here](#).

14. Dates of Importance in terms of KVK Law

April 7, 2016	Unless otherwise stated, the provisions of the KVK Law enter into force on April 7, 2016, the date of publication.
October 7, 2016	The following titled provisions of the PDP Law enter into force on October 7, 2016: 1. Provisions on the transfer of personal data to third parties and abroad 2. Provisions on the rights of the personal data subject 3. Regulations regarding the complaint of the personal data owner to the PDP Board 4. Provisions regarding crimes and misdemeanors arising from the KVK Law
April 7, 2017	Until April 7, 2017, personal data processed in accordance with the law before April 7, 2016 shall be deemed to be in accordance with the KVK Law, unless the personal data owners make a contrary declaration until April 7, 2017.
April 7, 2018	Personal data processed before April 7, 2016 shall be brought into compliance with the KVK Law until April 7, 2018.

This Policy may be revised by Derindere when deemed necessary. In case of revision, the most up-to-date version of the Policy will be available on the Company's website.