

Çelebi Hava Servisi Anonim Şirketi

Cookie Usage Clarification Policy within the Scope of the Personal Data Protection Law

This Cookie Usage Clarification Policy has been prepared by Çelebi Hava Servisi Anonim Şirketi (**‘Company’**) as the data controller within the scope of Article 10 of the Personal Data Protection Law No. 6698 (**“PDPL”**) and the Communiqué on the Procedures and Principles to be Followed in Fulfilment of the Clarification Obligation.

The purpose of this policy is to inform you about the processing of your personal data obtained automatically through the placement of cookies used on our website _____ on your device, for what purposes, what types of cookies we use and how you can manage these cookies.

For cookies other than mandatory cookies that we use on our website, your explicit consent is obtained and you are given the opportunity to change your consent at any time. Through the Cookie Management Panel, you can see the types of cookies used on our website and you can set your preferences with the ‘on/accept’ or ‘off/reject’ options for all cookies other than mandatory cookies. You can always change your preferences through this panel.

1. What is a Cookie?

Cookies are small text files that are temporarily saved on your computer or mobile device through your browser when you visit a site. Cookies do not contain personal information about you and are not used to identify individual users. Cookies usually have a unique identifier, which is an anonymous number stored on your device. Some cookies expire when your website session ends, while others remain on your computer for a long time.

2. Types of Cookies

Cookies are divided into two types: **‘persistent cookies’** and **‘temporary cookies’**.

Persistent cookies are created when you first visit the website; they remain on your device for the ‘lifetime’ of the cookie, i.e. the validity period, or until they are deleted by you. They are reactivated each time you visit the website on your device.

Temporary cookies are known as **‘session cookies’**. Temporary cookies are valid during a ‘browser session’. The browser session starts the moment you open your internet browser window and ends when you close your browser window. All temporary cookies are deleted when you close your browser.

Cookies may also be **‘first party cookies’** or **‘third party cookies’**.

First party cookies are cookies designed and used directly by our Company.

Third party cookies are cookies belonging to and managed by our Company's business partners, service providers, etc.

Cookies are divided into four main groups according to their functions; '**mandatory cookies**', '**performance and analysis cookies**', '**functionality cookies**' and '**advertising/targeting cookies**' .

Mandatory cookies are cookies that are mandatory for our website to function correctly. For example; authentication. Authentication is one of the mandatory cookies used to prevent the loss of information about your current session. These cookies are used for purposes such as security and verification and are not used for any marketing purposes.

Performance and analysis cookies collect anonymous data for statistical purposes to determine how users use our website, and are used to improve your user experience during your visit to our website. Without these cookies, we cannot check whether our website is working properly, learn how it performs and make the necessary corrections to provide you with a better user experience.

Functionality cookies allow our website to be tailored to your needs and preferences and to remember the preferences you have made. These cookies are used to provide user information, language, location preferences and other personal services. The information collected by these cookies does not enable the tracking of your activities on other websites. Without these cookies, the website cannot remember your previous preferences and cannot provide you a personalised experience.

Advertising/marketing cookies collect information about your browsing habits, remember that you have visited a website and share this information with other institutions and organisations. In this way, it ensures that adverts of your interest reach you. Although these cookies can track your visits to other websites, they usually cannot identify who you really are, as there is no connection between the data collected and your profile. Without these cookies, you will encounter less content that interests you. Advertising and marketing cookies are not used on our company's website.

3. Purposes and Legal Grounds for Processing Personal Data

Your personal data collected through cookies may be processed in order to maximise your user experience during your visit to our website, to create a website that you can access easily, to monitor our own performance, to ensure your security and confidentiality during your visit to our website and to store your username and password information in case you become a member in online transactions you will make on our website ('**Purposes**'), for the legal reasons stated below and within the personal data processing conditions specified in Article 5 of the PDPL.

Cookies are used for different purposes on our website. Depending on the type of the relevant cookie used, the data processing purposes and the data processing conditions within the scope of the PDPL that we rely on when using the relevant cookie may vary.

Mandatory cookies (Always active): For the data processing activities we carry out during the use of these cookies, we rely on the data processing conditions 'It is necessary to process personal data belonging to the parties to the contract, provided that it is directly related to the conclusion or performance of a contract' and 'It is mandatory to process data for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject' within the scope of Article 5 of the PDPL.

Performance and analysis cookies (optional): For the data processing activities we carry out during the use of cookies, which are in question in cases where you explicitly request our relevant online service, and first-party analytical cookies, which are statistical measurement tools used for purposes that do not significantly affect the privacy of users, such as obtaining general - statistical information, we rely on the data processing conditions of 'It is necessary to process personal data belonging to the parties to the contract, provided that it is directly related to the conclusion or performance of a contract' and 'It is necessary to process data for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject' within the scope of Article 5 of the PDPL.

We rely on **your 'explicit consent'** within the scope of Article 5 of the PDPL for the data processing activities we carry out during the use of cookies and third-party analytical cookies in cases where you have not explicitly requested our relevant online service.

Functionality cookies (Optional): For the data processing activities we carry out during the use of these cookies, we rely on **your 'explicit consent'** within the scope of Article 5 of the PDPL.

4. Which Cookies Do We Use?

Information on the types of cookies used on our website is given below. _____ is used on our website.

Name of the Cookie	Cookie Provider	Purpose of the Cookie	Type of the Cookie	Cookie retention time in the browser

5. To whom and for what purpose the processed personal data can be transferred

Your personal data collected in line with the fulfilment of the above-mentioned Purposes may be transferred to consultants and information technology infrastructure and service providers providing technical services related to cookies within the scope of our legitimate interest, to legally authorised public institutions and legally authorised private institutions within the scope of the data processing conditions regulated in Article 5 of the PDPL and in accordance with the rules regarding the transfer of personal data specified in Article 8 of the PDPL within the scope of clearly stipulated in the laws and the fulfilment of our legal obligations. Your data is not transferred abroad by our company, but if the data is located in the cloud environment or on servers originating abroad, data transfer to abroad may occur instantaneously.

6. Method of Personal Data Collection

Your personal data are collected electronically through cookies on our website within the scope of fulfilling the above-mentioned Purposes.

7. Cookie Management and Disabling Cookies

Generally, internet browsers are set so that the use of cookies is automatically permitted. You can limit, block, delete cookies through the settings of your internet browser or set your device to receive a warning when cookies are sent to your device. For different internet browsers, different methods may need to be used, you can find detailed information about this in the 'Help' section of your internet browser.

If you access our Company's website through different devices, you need to make sure that the 'Cookie Settings' of your internet browser for each device are adjusted in accordance with your preferences. If you block one or more categories of cookies, we may continue to collect information with existing cookies, but the use of blocked cookies will be terminated immediately.

In any case, if in the future you wish to remove cookies stored on your computer that require your consent, you can do so by using the tools provided by the web browser for this purpose. In this context, you can find additional information you may need from the links below:

Google Chrome: <https://support.google.com/chrome/?hl=tr#topic=3227046>

Mozilla Firefox: <https://support.mozilla.org/tr/>

Microsoft Edge: <https://support.microsoft.com/tr-tr/microsoft-edge>

Safari: <https://support.apple.com/tr-tr/HT201265>

8. Controlling the Use of Cookies

If you access our website via different devices, you can adjust the cookie usage

settings on each device and browser you access via the links below in accordance with your preferences.

Google Adwords	https://support.google.com/ads/answer/2662922?hl=en
Google Analytics	https://tools.google.com/dlpage/gaoptout
Google Chrome	http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647
Microsoft Edge	https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies
Mozilla Firefox	http://support.mozilla.com/en-US/kb/Cookies/
Opera	http://www.opera.com/browser/tutorials/security/privacy/
Safari	https://support.apple.com/kb/ph19214?locale=tr_TR

Changing your cookie settings does not prevent the use of our website and does not restrict your access to the content.

9. Your Rights as a Personal Data Subject and Ways to Apply to Our Company

Pursuant to Article 11 of the PDPL, you may exercise the following rights you have by applying to our Company:

- a) To learn whether personal data is processed or not,
- b) Request information if personal data has been processed,
- c) To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- d) To know the third parties to whom personal data are transferred domestically or abroad,
- e) To request correction of personal data in case of incomplete or incorrect processing,
- f) To request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear, although it has been processed in accordance with the provisions of the PDPL and other relevant laws,
- g) To request notification of the transactions made pursuant to subparagraphs (e) and (f) to third parties to whom personal data are transferred,
- h) To object to the emergence of a result to the detriment of the person himself/herself by analysing the processed data exclusively through automated systems,
- i) In case of damage due to unlawful processing of personal data, to demand compensation for the damage.

You can submit your applications regarding your rights listed above by filling out the **'Relevant Person Application Form'** on our website _____; **i.** by sending an electronic mail by using secure electronic signature, mobile signature or (if any) the electronic mail address previously notified to our Company by you and registered in our systems, **ii.** by sending an electronic mail to our registered e-mail address **celebihavaservisi@hs01.kep.tr** or **iii.** by coming to our Company's headquarters at Tayakadın Mah. Nuri Demirag Cad. No: 39 Arnavutkoy / Istanbul in person or by making a notification through a notary public.

Depending on the nature of your request, your applications will be finalised free of charge as soon as possible and within thirty days at the latest; however, if the transaction requires an additional cost, you may be charged a fee according to the tariff to be determined by the Personal Data Protection Board.

As the data controller, we may accept your request or reject it by explaining the reason and notify our response in writing or electronically. If your request in your application is accepted, our Company will fulfil the requirement. If your application is caused by an error of our Company as the data controller and if a fee has been charged for your application, it will be refunded to you.