

ÇELEBİ HAVA SERVİSİ ANONİM ŞİRKETİ

PERSONAL DATA PROCESSING, PROTECTION AND PRIVACY POLICY,

As Çelebi Hava Servisi Anonim Şirketi (**‘Company’** or **‘Çelebi’**), we attach great importance to the protection of the privacy of the personal data of our customers and visitors.

The purposes of this Personal Data Processing, Protection and Privacy Policy (**‘Policy’**) are to inform you about the personal data we collect in accordance with the Personal Data Protection Law No. 6698 (**“PDPL”**), how and why we collect them, how we process them, with whom we share them, how we take the necessary technical and organisational measures to ensure data security and your rights regarding your personal data within the scope of the services we offer through Çelebi **Platinum** and our activities in connection therewith.

1. Definitions

Data Subject	: Real person whose data is processed within the scope of the PDPL.
Personal Data	: All kinds of information related to the identified/identifiable real person.
Special Categories of Personal Data	: Any information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs; trade union membership, genetic data, biometric data processed solely to identify a person; health-related data, data on a person's sex life or sexual orientation.
Data Controller	: Any organisation, person or body that determines the purposes and means of processing personal data, controls the data and is solely or jointly responsible. Data controller within the scope of this Policy: Çelebi Hava Servisi Anonim Şirketi Mersis No: 0234003987500012 Tayakadın Mah. Nuri Demirağ Cad. No: 39 Arnavutköy / İstanbul
Data Processor	: A real or legal person, public authority, institution or other body that processes personal data on behalf of the data controller.
Processing	: Any operation performed on personal data, such as the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, deletion or destruction of personal data.

Third Party	: Any real or legal person, public authority, agency or other body other than the data subject, controller, processor and persons authorised to process the data under the direct authority of the controller or processor.
Transfer	: Intentionally sending personal data to another party or making the data accessible, where the sender or recipient is not the data subject.

2. Which Personal Data Do We Collect? How Do We Collect Personal Data?

Your personal data can be collected by our Company through our Company's websites, corporate social media accounts, whatsapp account, dealers, sales points, printed forms, telephone, call centre, electronic mail, correspondence via notary public and/or postal mail, customer interviews, interviews during the contract signing phase, procedural methods carried out through verbal, written or electronic media and physical channels, by automatic or non-automatic means.

3. Information Provided by You

When you create your account, you share your e-mail address, password and telephone number with us, and your order address and billing information within the scope of your orders.

If you contact us regarding our products, services and/or help requests, we may request your e-mail address and contact information.

3.1 Automatically Collected Information

As with most websites and mobile applications, certain data is automatically collected when you visit a website or use a service application. Data collected automatically are service metadata, log data, device information, last used service, session data, navigation data, IP addresses and third party data and cookie information.

3.2 Cookie Information

When you access the Website or mobile application, we collect certain data from your browser using cookies. The cookies used include both first-party and third-party

cookies. First-party cookies allow us to collect analytics data, remember your settings, learn the page you last visited and the service you last used, and perform other useful functions that help simplify your user experience. Third party cookies are used by third parties for advertising, retargeting, analytics, marketing and tracking.

Cookies vary in nature and purpose. For example, a 'session cookie' exists only in your device's temporary memory, i.e. while your session or visit to a Website is in progress, and is usually deleted when your web browser is closed. On the other hand, a 'persistent cookie' has a longer lifespan: it remains on your device until you delete it (i.e., until you instruct your browser to do so) or until it expires. A 'secure cookie' can only be sent over a 'secure' (encrypted) connection, making it difficult for others to intercept the information. A 'first party cookie' indicates that the cookie belongs to us and a 'third party cookie' indicates that the cookie belongs to someone other than Çelebi.

We use Google Analytics and Facebook cookies, which are web analytics tools that help us understand how users interact with the Website. Like many services, Google Analytics and Facebook cookies use first-party cookies to collect information about how users use our site and to track user interactions. This information is used to compile reports and help us improve our Website. The reports describe website trends without identifying individual visitors. You can disable Google Analytics and Facebook cookies without affecting how you visit our Site.

Please note that we do not change our practices in response to the 'Do Not Track' signal in the HTTP header from a browser or mobile application, but most browsers allow you to control cookies, including whether to accept them and how to remove them. You can set most browsers to notify you when you receive a cookie or to block or remove cookies altogether.

Third party cookies can usually be managed by tools provided by those parties. Some of such tools are as follows:

<https://tools.google.com/dlpage/gaoptout> (Google Analytics opt-out);
<https://yandex.com/support/metrika/general/opt-out.html> (Yandex Metrika opt-out); <https://www.facebook.com/policies/cookies> (Facebook cookie policy and opt-out); <http://optout.networkadvertising.org> (Network Advertising Initiative opt-out page); <http://optout.aboutads.info> (Digital Advertising Alliance opt-out page).

More information about cookies and how to manage them can be found at <http://www.allaboutcookies.org>.

In addition, it will be useful for you to read the **Cookie Usage Clarification Policy** on our website regarding the subject.

3.3 Other Information

We may receive from you information that you provide to us when you complete forms (e.g. applications or surveys) that are/may be available on our website or participate in our related campaigns or programmes, sign up to receive notifications, newsletters or other electronic media from us, request support, interact with our social media accounts or correspond or communicate with us in any other way. If you send us emails, letters or messages, we may keep a record of such communication, including your name, email address or telephone number (if applicable, as included in the messages/emails), the content of your communication and our response. We may supplement this data with other information.

4. How and Why Do We Process Your Personal Data?

We may collect or receive personal data from you in various ways. You provide us with personal information directly when you contact us or when you select cookies. The table below sets out the legitimate purpose we rely on when processing your personal data for the different contexts in which we engage with you.

The legal bases for the processing of personal data under the PDPL are as follows:

Consent: Where you have freely given a specific, informed and explicit agreement.

Contract: Where the processing is necessary for a contract you have entered into with us or where certain steps need to be taken before entering into a contract.

Legal obligation: If the processing is necessary for us to comply with the law.

Vital Importance: If the processing is necessary to protect someone's life.

Public Duty: Where the processing is necessary for us to fulfil a duty in the public interest or for our official functions and the duty or function has a clear basis in law.

Legitimate Interest: Where the processing is necessary for our legitimate business interests or the legitimate interests of a third party and as long as it does not prejudice the protection of your personal data.

How Your Personal Information is Collected	Types of Personal Data Collected	How We Process Your Personal Data	Legal Basis for Processing Your Personal Data
Online browsing	IP address, browser information, device information, duration of your visit, clicks, referring/exit pages	We use special cookies on our website to ensure the proper functioning of our website, interface personalisation such as language or any user interface customisation, to improve the user experience and our website, to ensure that our website is safe and secure, to run statistics.	Your consent to cookies and our legitimate interest in improving our services, communicating with visitors and customers and ensuring security.
Social Media Platforms and Store Reviews	Any comments mentioned in your post or direct messaging to our social media accounts and stores.	To monitor and improve our website and/or perform analyses or collect statistics.	Our legitimate interest in improving our products and services and communicating with visitors and customers.
Creating a User Account	Your name, surname, e-mail address, telephone number, password, address, Turkish ID number, gender, nationality, country of	Your profile is a unique structure that distinguishes you from other players and data about it is used for player customisation purposes.	Your consent when creating your account.

	residence		
--	-----------	--	--

5. Special Categories of Personal Data

As Çelebi, **we do not collect and process sensitive personal data** such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data processed solely to identify a person, health-related data, data relating to a person's sex life or sexual orientation.

6. Transfer of Personal Data

We may transfer your personal data in accordance with the PDPL and on a legal basis. We do not sell, trade or otherwise transfer your personally identifiable information to third parties. Your personal data may also be disclosed to third parties other than suppliers if we have an obligation to disclose or share your personal data to comply with a legal obligation, and in other cases, we may only transfer your personal data if we have your consent or if permitted by law.

7. Storage and Destruction of Personal Data

For detailed information on the storage and destruction of personal data, please review our **Personal Data Storage and Destruction Policy**.

8. Data Security

This Policy applies only to the data provided by Çelebi during the session and/or by you.

Çelebi has implemented administrative and technical measures that it believes to be appropriate to protect the confidentiality, integrity and availability of your personal data. Despite our efforts, we cannot guarantee that your personal data will be absolutely secure against unauthorised or unlawful processing or accidental loss, alteration or destruction during transmission over the internet or while stored in our systems or in the systems of our service providers or otherwise under our supervision, or that it will always or shortly after any event remain truly intact and confidential. Also note that we cannot control and are not responsible for the actions of other parties with whom you share (or instruct us to share) your personal data.

9. Personal Data Protection Rights within the Scope of the PDPL

Pursuant to the PDPL, you have rights that we must protect and prioritise through our data practices. These rights are listed below:

Right to information: You have the right to ask what kind of information is processed and why we need it.

Right of access: You have the right to request copies of your personal data. We may charge you a fee for this service.

Right to rectification: You have the right to request that we correct any information that you believe is inaccurate. You also have the right to request that we complete information that you believe is incomplete.

Right to be forgotten: You have the right to request that we delete your personal data under certain circumstances.

Right to restrict processing: You have the right to request that we restrict the processing of your personal data under certain circumstances.

Right to data portability: You have the right to request that we transfer the data we collect to another organisation or directly to you under certain conditions.

Right to object: You have the right to object to our processing of your personal data under certain conditions.

Right to avoid automated decision-making: You have the right not to be subject to a decision based solely on automated processing, including profiling, which has legal effects concerning you or similarly affects you.

10. Changes in Policy

We may revise and amend this Policy from time to time to reflect changes in our products and services, applicable laws, regulations or standards, or other changes that may occur in our business. We will post the revised Policy (or, as the case may be, our new privacy policy) on the same web page where we post this Policy or on another web page that we may habitually use to post materials such as the Policy in the future. We may also use other means to notify you of changes to the Policy. The revised Policy (or a new one as appropriate) will be effective as soon as it is published as described, unless the document itself specifies a later time for it to take effect.

11. Contact

If you have any questions about this Policy or our data processing practices, or if you wish to exercise any of your ‘data subject’ rights in relation to the personal data we store about you, do not hesitate to contact us at our addresses below.

Address: Tayakadın Mahallesi Nuri Demirag Caddesi No: 39 Arnavutkoy / Istanbul

