

ÇELEBİ HAVA SERVİSİ ANONİM ŞİRKETİ

CUSTOMER CLARIFICATION TEXT ON PROCESSING OF PERSONAL DATA

This Clarification Text has been prepared by **Çelebi Hava Servisi Anonim Şirketi** ('**Company**') in its capacity as the data controller, based on the obligation to inform within the scope of Article 10 of the Personal Data Protection Law No. 6698 ("PDPL") and the relevant legal legislation. Our Company may process your personal data in accordance with the provisions of the PDPL and within the scope specified in this Clarification Text.

Detailed information on the protection, storage and destruction of your personal data by our Company is provided in the **Personal Data Processing, Protection and Privacy Policy** and **Personal Data Storage and Destruction Policy** on _____.

1. Identity of the Data Controller

The identity and contact information of our Company, which has the title of data controller in accordance with the PDPL, is as follows:

Title Çelebi Hava Servisi Anonim Şirketi

Mersis No: 0234003987500012

Address Tayakadın Mah. Nuri Demirag Cad. No: 39 Arnavutkoy / Istanbul

E-mail: info.tr@celebiaviation.com

2. Categories of Personal Data Processed

The categories of personal data that may be processed by our Company within the scope of the purposes and legal reasons specified in this Clarification Text in accordance with the PDPL and the relevant legal legislation are as follows:

Identity Information (name, surname, Turkish ID number, date of birth, gender, nationality and country of residence)

Contact Information (contact address, telephone number (mobile phone), e-mail address)

Customer Transaction Information (service request information, shopping information, call centre records)

Financial Information (credit card information and/or bank account information in case of refund)

Visual and Audio Recordings (in case of shooting for our customers for the purpose of carrying out promotional and advertising activities in media such as social media, websites, news sites, etc., our customer will be informed and his/her explicit consent will be obtained. After obtaining the explicit consent of our customer based on the clarification, such image or video shooting records may be published on our Company's social media, website and/or news sites for the purpose of advertising and

promotion of our Company and our brands).

Physical Space Security (indoor and outdoor camera recordings of the visits of customers and visitors)

Transaction Security (IP address information, website login and exit information)

Risk Management (if a sole proprietorship; information processed for the management of commercial, technical, administrative risks)

Other Information (all kinds of contracts, protocols that regulate the legal relationship between our Company and our customer such as sales contract, order form, order request, order confirmation)

3. Purposes of Processing Your Personal Data

Your personal data may be processed in accordance with the principles stipulated in the PDPL and within the personal data processing conditions specified in Articles 5 and 6 of the PDPL, for the purposes of selling, offering and/or tracking services, carrying out commercial and/or operational activities carried out by our Company and carrying out related business processes, receiving and evaluating suggestions for the improvement of our business processes, carrying out product and/or service sales processes, carrying out communication activities, carrying out informative and promotional activities about our products and services, creating membership registrations and operating membership accounts in accordance with your request, evaluating requests and complaints, carrying out payment processes, carrying out accounting and finance transactions, event and/or organisation management, planning and/or execution of campaign, promotion and/or publicity processes, receiving campaign participation requests, planning and execution of customer relationship management processes, planning and execution of customer satisfaction activities, carrying out activities for customer satisfaction and experience, carrying out advertising and/or promotion and marketing activities in digital and other media, carrying out sales activities related to other services offered by our Company, carrying out marketing processes of products and services, planning the processes of creating and / or increasing loyalty to the products and / or services offered by our Company, carrying out raffle / survey activities and sending commercial electronic messages (text messages / SMS) to your preferred contact information for advertisements, promotions, campaigns and similar purposes related to the brands of our Company, carrying out information security processes, carrying out audit and reporting activities, carrying out audit and ethical activities, providing information/documents to authorised persons or institutions in accordance with legal obligations and

conducting all kinds of official correspondence, managing and executing contract processes, following up and conducting legal affairs, using them as evidence in possible disputes, ensuring compliance with the storage obligations arising from the legislation, performing verification and controls, responding to relevant person applications in accordance with the legislation, ensuring that the data is kept accurate and up-to-date, keeping personal data during the general statute of limitations, ensuring physical space security (**'Purposes'**).

4. Method and Legal Reason for Collecting Your Personal Data

Your personal data may 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 made through notary public and/or postal mail, customer interviews, interviews during the contract signing phase, verbal, written or electronic media and physical channels, by automatic or non-automatic means.

Your personal data in question can be processed without seeking your explicit consent, based on the legal reasons stated in Article 5 of the PDPL, which are 'in cases clearly stipulated in the law', 'it is mandatory for the data controller to fulfil its legal obligation' 'provided that it is directly related to the conclusion or performance of a contract, it is necessary to process personal data belonging to the parties to the contract', "data processing is mandatory for the establishment, exercise or protection of a right" and 'data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject'. Your personal data in question may be transferred to judicial authorities or relevant official authorities upon request to resolve legal disputes or in accordance with the relevant legislation.

In addition, your sensitive personal data may be processed without seeking your explicit consent based on the legal reasons stated in Article 6 of the PDPL such as 'the explicit consent of the person concerned', 'explicitly stipulated by law', 'it is mandatory for the protection of the life or physical integrity of the person who is unable to disclose his consent due to actual impossibility or whose consent is not legally valid, himself or someone else' "it is related to the personal data made public by the data subject and is in accordance with the will of the data subject to make it public", "it is mandatory for the establishment, exercise or protection of a right", "it is necessary for the protection of public health, preventive medicine, medical diagnosis,

treatment and care services and the planning, management and financing of health services by persons under the obligation of confidentiality or authorized institutions and organizations”, “it is mandatory for the fulfilment of legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance” ‘foundations, associations and other non-profit organisations or formations established for political, philosophical, religious or trade union purposes are intended for current or former members or persons who are in regular contact with these organisations and formations, provided that they comply with the legislation to which they are subject and their purposes, are limited to their fields of activity and are not disclosed to third parties’. Your personal data in question may be transferred to judicial authorities or relevant official authorities upon request to resolve legal disputes or in accordance with the relevant legislation and in accordance with Article 8 of the PDPL, in the second paragraph of Article 5 of the PDPL, provided that adequate measures are taken, in the presence of one of the conditions specified in the third paragraph of Article 6 of the PDPL, without seeking your explicit consent, and may also be transferred in accordance with the provisions of other legislation regarding the transfer of your personal data.

In case you give explicit consent; i. your identity, contact, customer transaction information data may be processed **based on the legal reason of explicit consent** for the purposes of promoting our company's products, services and brands, planning and/or execution of advertising and/or promotion and/or marketing activities in digital and/or other media, planning and / or execution of activities for customer satisfaction and / or experience, planning and / or execution of marketing processes of products and / or services, planning and / or execution of promotional activities, planning and / or execution of the processes of creating and / or increasing loyalty to the products and / or services offered by our Company, presenting general and special offers to you, informing you about advertisements and campaigns and planning and / or execution of raffle / survey activities, **ii. your identity and contact data** may be processed **based on the legal reason of explicit consent** for the purposes of sending commercial electronic messages (text messages/sms) to your preferred contact information for the purposes of promotion, advertisement, publicity, campaign, survey, raffle, gift, greeting and similar reasons related to all other brands of our Company.

5. Parties to whom Your Personal Data are Transferred and Purposes of Transfer

.Your personal data collected may be transferred to our dealers located in the country, branches, business partners, suppliers, Çelebi Group companies, domestic consultants who process personal data on behalf of our Company and service providers providing technical services related to information technology infrastructure and cookies, our lawyers and consultants within the framework of confidentiality obligation in order to

follow legal processes, and legally authorised public/private institutions and organisations to carry out the necessary work by our business units and to carry out the relevant business processes in order to make our customers benefit from the products and services offered by our Company, including the sales and marketing activities of our products and services, based on legitimate interest, in line with the fulfilment of the above-mentioned Purposes and within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the PDPL. Your personal data is not transferred abroad by our Company, but if the data is located in the cloud or servers of foreign origin, data transfer to abroad may occur instantaneously.

Any personal data transfer other than the above-mentioned Purposes will not be carried out without your explicit consent.

6. Your Rights as a Personal Data Subject and How to Apply to Our Company

The rights you have on your personal data that you have shared with our company in accordance with Article 11 of the PDPL are as follows:

- a. To learn whether personal data is being processed,
- b. Requesting 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 e-mail

to info.tr@celebiaviation.com by using secure electronic signature, mobile signature or (if any) the e-mail address previously notified by you to our Company and registered in our systems, **ii.** by sending an e-mail to our registered e-mail address **celebihavaservisi@hs01.kep.tr** or **iii.** You may notify our Company by coming to our Company headquarters at Tayakadın Mah. Nuri Demirağ 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 a fee has been charged for your application, it will be refunded to you.