

Privacy and Personal Data Processing and Protection Policy

OCCATECH BİLİŞİM HİZMETLERİ AŞ - JEWELLERY ANTALYA APPLICATION

PERSONAL DATA PROCESSING INFORMATION TEXT

1. INTRODUCTION

The protection and security of your personal data is one of our priorities at OCCATECH BİLİŞİM HİZMETLERİ AŞ ("Company/Our Company"). In this regard, we attach great importance to the processing and preservation of all personal data belonging to individuals related to our company, including users of our products and services, in accordance with the Personal Data Protection Law No. 6698 ("PDP Law"). In this context, in accordance with the definitions in the PDP Law, as the "Data Controller" and in compliance with the Communiqué on the Procedures and Principles to be followed in the Implementation of the Notification Obligation published in the Official Gazette dated 10 March 2018 and numbered 30356 ("Communiqué"), we provide this information regarding the identity of our company, the purposes for which personal data will be processed, to whom and for what purposes the processed personal data may be transferred, the method of collecting personal data, and the legal basis for the processing of personal data, as well as the rights of personal data owners in accordance with Article 11 of the PDP Law.

In this Information Text, unless otherwise explicitly stated, expressions such as "we" and "our" are used to refer to OCCATECH BİLİŞİM HİZMETLERİ AŞ - JEWELLERY ANTALYA APPLICATION.

2. PERSONAL DATA

2.1. Definition of Personal Data

In accordance with Article 3/I (d) of the PDP Law, "personal data" refers to any information relating to an identified or identifiable real person. In this context,

personal data refers to any information relating to an identified or identifiable real person. For example, your name, surname, TC identity number, address, telephone number, email address, date of birth, country of origin, distance from the Occatech Collectors at the fair area, times of entry and exit to the fair area, IP number you accessed, information about the transactions you made, etc. are your personal data. In addition, according to the PDP Law, data such as race, ethnic origin, political opinion, philosophical belief, religion, sect, or other beliefs, appearance and clothing, membership in associations, foundations, unions, etc., health, sexual life, conviction and security measures, biometric and genetic data, etc. are special categories of personal data. In this context, anonymous information, information anonymized and other data that cannot be associated with a specific person are not considered personal data according to our Company's Policy on this matter.

2.2. Concept of Processing of Personal Data

In accordance with Article 3/1 (e) of the PDP Law, the processing of personal data refers to any operation performed on personal data, including the collection, recording, storage, preservation, modification, reorganization, disclosure, transfer, inheritance, making available, classification, or prevention of the use of personal data, either completely or partially, by automatic or non-automatic means as part of any data recording system.

3. SCOPE OF INFORMATION

3.1. Identity of the Data Controller

According to the KVK Law, "Data Controller" refers to the natural or legal person who determines the purposes and means of processing personal data, and is responsible for establishing and managing the data record system. Therefore, according to the KVK Law, the "Data Controller" is OCCATECH BILISIM HIZMETLERI AS, and its Corporate Identity Information is as follows:

Trade Registry No: 238266-5

Tax Office: KOCASINAN

Tax Number: 6330930191

Headquarters Address: SIRINEVLER MAHALLESİ ADNAN KAHVECİ BLV. NO:
178/12 BAĞÇELİEVLER/İSTANBUL

Website: occatech.com

Email Address: info@occatech.com

3.2. Scope of Responsibility of the Data Controller

After the collected data is processed, it will be transferred to the JEWELRY EXPORTERS UNION and the copies on OCCATECH's side will be deleted on March 1, 2023. All requests for viewing and deleting data after March 1, 2023 will be handled by the JEWELRY EXPORTERS UNION, and will not be the responsibility of OCCATECH.

3.3. Collection, Processing and Processing Purposes of Personal Data

Your personal data may vary depending on the service, product or commercial activity provided by our company; and can be collected orally, in writing or electronically through office, branches, dealers, call centers, websites, social media channels, mobile applications and similar means through automated or non-automated methods.

In accordance with Article 5.2 and Article 6.3 of the KVK Law, your personal data can be processed without your explicit consent for the purposes of fulfilling our legal obligations, entering into or performing a contract, fulfilling our legal obligations, establishing, exercising or protecting a right, and protecting our legitimate interests without violating your fundamental rights and freedoms. Your personal data can also be processed with your explicit consent for the purposes specified in this Information Text within the scope of

Article 5.1 and Article 6.2 of the KVK Law. All collected and processed data will be shared by OCCATECH with the JEWELRY EXPORTERS UNION and will not be shared with any other third party or individual. You also explicitly consent to the processing of your personal data in exceptional cases.

The personal data collected from you will be processed within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the KVK Law, in accordance with the relevant legal regulations, for the purposes of enabling the necessary work of our business units to benefit from the products and services offered by our company, customizing the products and services offered by our company according to your preferences, usage habits and needs, providing legal and commercial security of individuals using our application in business relationship with our company (administrative operations related to communication carried out by our company, ensuring physical security and control of our company's locations, evaluating process of our partners/customers/suppliers (authorized or employees), legal compliance process, financial affairs, etc.), determining and implementing our company's commercial and business strategies, and providing the implementation of our company's human resources policies.

3.4. To Whom and for What Purposes the Processed Personal Data Can Be Transferred

Your personal data collected for the purposes of enabling the necessary work of our business units to benefit from the products and services offered by our company, customizing the products and services offered by our company according to your preferences, usage habits and needs, providing legal and commercial security of individuals using our application in business relationship with our company (administrative operations related to communication carried out by our company, ensuring physical security and control of our company's locations, evaluating process of our partners/customers/suppliers (authorized or employees), legal compliance process, financial affairs, etc.), determining and implementing our company's commercial and business strategies, and providing the implementation of our company's human resources policies, can be transferred to the following recipients in accordance with Articles 8 and 9 of the KVK Law and other relevant legal regulations:

- Administrative and official authorities that are legally required to be transferred,
- Relevant individuals and institutions in order to fulfill legal obligations,
- Independent auditing companies within the framework of legal restrictions, tax consultants and lawyers,
- Partners, shareholders (domestic and foreign) who have been or will be provided services, business partners,
- Authorized public institutions and private individuals within the scope of the legal regulations.

3.5. Method of Collecting Personal Data and Legal Basis

When users download the app and enter their ticket information, the data mentioned above associated with the ticket is transferred from the ticket company to OCCATECH. As long as the user is in the event area of Kaya Palazzo Belek Hotel and uses the app, the app communicates with the transmitters placed in the event area to calculate the user's locations within the event area. These calculations are performed on OCCATECH's servers. This data flow and location calculation is only carried out within the event area using special transmitters placed in the event area, and no data flow occurs outside the event area. The app does not collect location data from users outside the event area and time of the event, and these location services cannot technically and theoretically work without transmitters placed in the event area.

Your personal data is collected through various channels such as our audit and consulting services, written/digital applications to our company employees, our website, calls to our phone numbers, social media, SMS channels, and other oral, written or electronic means of communication that our company uses or may use in the future, in order to carry out our activities and fulfill our contractual and legal obligations to you. The personal data collected is stored within the legal periods specified by the relevant legislation.

3.6. Collection of Personal Data

The collection of personal data will take place in the event area of Kaya Palazzo Belek Hotel, between the dates of 05.01.2023 and 09.01.2023, between the hours of 09:30 and 17:30. Users are not required to use the app during the event. Those who prefer can use physically printed entry cards instead of the app to enter the event area. Entry cards will be provided by the event organizer. There will be no restrictions on accessing the event if the user does not use the app.

Users can download the app from the App Store or Google Play, or they can have it installed on their phones by giving their phones to an authorized person at the event entrance or by downloading it directly via a link.

3.7. Rights of the Data Subject under Article 11 of the PDPL

As personal data owners, you can submit your requests regarding your rights to our company through the methods outlined in this notification text. Our company will respond to the request free of charge within thirty days, depending on the nature of the request. However, if a fee is prescribed by the Personal Data Protection Board, our company will charge the fee specified in the tariff. In this context, personal data owners can exercise the rights granted by Article 11 of the PDPL as follows:

To learn whether your Personal Data is processed, to request information about it if it has been processed, to learn the purpose of processing your Personal Data and whether they are used in accordance with its purpose, to request correction of personal data if it is incomplete or incorrectly processed, to process personal data to be evaluated within the principles of purpose, duration and legitimacy. In case the reasons disappear, the User has the opportunity to contact the MÜCEVHER İHRACATÇILARI BİRLİĞİ to request the deletion or destruction of the data collected about him or to get information about how they are used. They have the right to have their Personal Data

corrected, to object to this result in case a result occurs against them if the processed personal data is analyzed exclusively through automated systems, and to demand that the damage be remedied in case their Personal Data is processed unlawfully and they suffer damage due to this reason.

Pursuant to paragraph 1 of Article 13 of the KVK Law, you may submit your request regarding the exercise of your above-mentioned rights to our Company in writing or by other methods determined by the Personal Data Protection Board. Since the Personal Data Protection Board has not determined any method at this stage, you must submit your application to our Company in writing in accordance with the KVK Law. In this context, the channels and procedures through which you will submit your application in writing to our Company within the scope of Article 11 of the KVK Law are explained below.