

PRIVACY STATEMENT ABOUT PROTECTION OF YOUR PERSONAL DATA ACCORDING TO THE PROCEDURES AND PRINCIPLES OF LAW NUMBERED 6698 ON PROTECTION OF PERSONAL DATA (“KVKK”)

PRIVACY NOTE FOR CUSTOMERS / MEMBERS

We hereby inform you that SteelOrbis Elektronik Pazaryeri A.Ş. (“the Company”) incorporated in Turkey might process your personal data as the data controller for the following reasons and purposes:

- Within the framework of our legal relationships,
- Within the framework of a purpose requiring such processing activity and in a manner associated with, limited to and to extent of such purpose,
- Accuracy and currency of the personal data you presented to us or we have obtained shall be protected,
- Such personal data will be saved, stored, kept and re-edited; such data will be shared with the organizations that have the legal right to demand such information and such data will be transferred, made available to the domestic third parties as well as being classified as described by the Law on Protection of Personal Data and such data might be processed in various forms listed in the Law on Protection of Personal Data.

TYPES OF PERSONAL DATA WE PROCESS

The personal data that we collect if you share with us or use our platform and that might processed, if necessary, is as follows:

| | |
|---------------------------|---|
| ID Details | Name, surname, Turkish ID Number |
| Contact Details | Phone number, e-mail, address |
| Financial Data | Bank account details, credit card information (including CVV number) |
| Employment data | Employer company, department, title, profession, signature |
| Visual and Audio Data | Photo, video recording, voice recording of a natural person (for conferences) |
| Data about Use of Website | Date of filling out the application form, offers received or not received, date of membership, date of obtaining paid membership, frequency / times of logging into the website, date of last login, IP address, user membership password, information surfing in the website |

LEGAL REASONS OF PROCESSING PERSONAL DATA AND METHODS OF COLLECTING

Your personal data is processed automatically or via non-automatic methods provided that these methods are parts of our data recording system and this processing shall be based on the following legal reasons as explained in Article 5 and 6 of the Law numbered 6698. If:

- It is clearly provided for by the laws,
- It is mandatory for fulfilling our legal obligations,
- The processing of such data is directly linked with concluding or performing a contract (Membership Agreement, Terms of Use and performance of a contract based on them, establishment and protection of rights)
- The processing of such data is mandatory for protecting legitimate interests (collecting data required for providing the services related to the portal, particularly for preventing fraud)
- Such data is made available to the public by the data subject,

- Processing such data mandatory for establishing, using or protecting a right,
- You have given explicit consent.

We request your personal data for fulfilling our legal obligations, performing our service contract or because of regulatory reasons and for protecting the legitimate interests of the company and such data is collected if you provide them verbally, in person or via e-mail.

PURPOSES OF PROCESSING PERSONAL DATA

The Company may process your personal data for the purposes and reasons including but not limited to the following purposes and legal reasons.

For managing the member/customer service relationship we are going to have with you and particularly for:

- Establishing a member-customer relationship and monitoring this relationship in our services,
- Providing assistance about your membership, if required, and solving technical problems,
- Sending your invoices and other legal documents to you,
- Renewing your membership when expired,
- Providing information about your debt status and other membership information,
- Completing collection procedures,
- Including the names of participants in the announcements related to our conferences and in the lists of participants released on our website,
- Fulfilling your demands.

For offering better services, improving our company and completing marketing and research activities;

- Managing complaints,
- Predicting our members/customers' product trends,
- Following up your satisfaction about our services,
- Sending mass e-mails and push notifications for promoting our other products if you agree to receive them,
- Organizing campaigns and deals for you

For managing the company, running its activities and implementing the Company policies and particularly for:

- Quality controls in the company,
- Issuing and archiving membership documents,
- Performing reception and information desk procedures,
- Fulfilling our financial and fiscal obligations,
- Making researches to offer better services.

Your personal data might be also processed for exercising our right of defense or for fulfilling our legal obligations if such data is duly requested during a judicial process.

Your personal data shall be kept for the maximum specified in the related regulation or required for the purpose of processing and, in any case, such data shall be kept as long as the legal statute of limitation.

TRANSFER OF YOUR PERSONAL DATA TO DOMESTIC THIRD PARTIES

Your personal data might be transferred to expert companies or to servers of applications we use from time to time for performing certain activities. For example:

- Your data might be transferred to the courier companies and delivery companies for sending invoices, contracts and newsletters / magazines.
- If you are on our mass e-mail list, your data might be transferred to mass e-mailing companies only for completing the specified activity.

- If you need technical support, the consulting companies that assist us might need to have access to our systems from time to time and therefore your personal data in our related systems might be accessed by these companies. However, we take necessary actions to prevent use of your personal data by these companies.
- Your personal data might be transferred to the companies we cooperate from time to time for offering promotions, if you consent to such transfers.
- Your data might be also transferred to the banks for making collections.
- Your personal data might be transferred to gift companies for sending gifts to you on special occasions.
- Your data might be transferred to the third party companies working with us for marketing and promotional activities however this transfer is limited to such activities.,
- We might share your data with our lawyers for exercising our right of defense and with related organizations for fulfilling our obligation to meet legal demands such as court orders or evidences requested provided that such requests are made legally and duly.

TRANSFER OF YOUR PERSONAL DATA TO FOREIGN THIRD PARTIES

In some cases, your personal data might be transferred to the following receiving groups on abroad for the following purposes.

- You might work with foreign third party companies to send mass e-mails for informing you about the latest developments, promotions and innovations. Your personal data might be shared with these companies solely for this purpose.
- Your personal data might be transferred to the foreign servers of customer satisfaction analysis companies for finding out your satisfaction about our services and discovering ways of satisfying you and other customers more.
- Your personal data might be transferred to the foreign servers of applications and databases that are used to save information, documents, files and such other records issued, received and obtained within the framework of our activities.
- The servers of our e-mail service provider are on abroad and therefore your personal data included in our e-mails are considered as transferred to abroad when sending internal and external e-mails.
- If the servers of the third party companies we use for marketing and advertising activities are located on abroad, your personal data might be transferred to abroad.

YOUR RIGHTS

According to Article 11 of the Law on the Protection of Personal Data, you have the following rights regarding your personal data provided that you verify your ID;

- To learn whether the company has processed your personal data or not and to request information related to such processing, if your personal data has been processed,
- To learn the purpose of processing your personal data and whether such data has been used for intended purposes or not,
- To learn if your personal data has been transferred domestically or to abroad, and to learn the ID of the receiving parties of such transfers.

Furthermore, you have the right to ask the Company to correct your false and incomplete data and also to notify the receiving parties that received or that might have received the data.

You might ask the Company to destruct (to erase, destruct or anonymize) your personal data within the framework of Article 7 of the Law on the Protection of Personal Data. Also, you have the right to ask the Company to notify the third parties that received or that might have received your personal data about your demand of data destruction. However, your request of data destruction will be assessed by us and we are going to review the optimum method of destruction depending on the conditions of each specific case. Accordingly, you might always ask us to provide information about the reasons of selecting a method of destruction.

You might object to the results of personal data analysis made exclusively with an automated system if such results are against your interests.

If you suffer any losses because of illegal processing of your personal data, you might claim compensation for such losses.

The demands you make in your application shall be concluded within maximum thirty days depending on the nature of the demand and free of charge. However if the action in question brings any extra costs to the Company, the price set by the Personal Data Protection Board in accordance with the Communiqué on Procedures and Principles of Applying to the Data Controller may be collected.

According to the first paragraph under Article 3 of the Law on the Protection of Personal Data, the data subject must lodge an application to the data controller, i.e. to our company, about these rights in writing or via other methods specified by the Personal Data Protection Board (“the Board”).

Accordingly, the applications to be made to our Company can be:

- Made in person by the applicant,
- Signed by the applicant with secure electronic signature verified as defined by the Electronic Signature Law numbered 5070 and then sent to our Company’s following registered electronic mail address: steelorbis@hs01.kep.tr,
- E-mailed to our Company by the Applicant using an electronic address previously submitted to our Company and registered in our Company’s system.

| Method of Application | Address for Application | Informed to be Specified in the Application |
|---|--|---|
| Application in person (Application made by the Applicant in person by presenting a document to verify his/her ID) | 19 Mayıs Mahallesi, Atatürk Caddesi Yamaç Sokak Şeref Yazgan İş Merkezi, No:1, Kat: 7, D: 18Kozyatağı – 34736 İstanbul | The following phrase must be on the envelope: “ <i>Kişisel Verilerin Korunması Kanunu Bilgi Talebi</i> ” (Information Requested Under Law on Protection of Personal Data) |
| Signed with “Secure Electronic Signature” and sent via Registered Electronic Mail (KEP) | steelorbis@hs01.kep.tr | Subject line of the e-mail must be “ <i>Kişisel Verilerin Korunması Kanunu Bilgi Talebi</i> ” (Information Requested Under Law on Protection of Personal Data) |
| E-mail sent to our Company by the Applicant using an electronic address previously submitted to our Company and registered in our Company’s system. | info@steelorbis.com | Subject line of the e-mail must be “ <i>Kişisel Verilerin Korunması Kanunu Bilgi Talebi</i> ” (Information Requested Under Law on Protection of Personal Data) |

You must submit your application about matters related to processing of your personal data to our Company in writing or via a registered electronic mail (KEP) address, secure electronic signature, mobile signature or your electronic mail address previously notified to and recorded by us. Depending on the scope of your request and method of application, the Company might require additional methods of verification (sending a text to your registered phone number, phone call etc.) for confirming that your application is actually made by you and for protecting your rights. For example, if you make an application using your e-mail address recorded in the Company’s system, the Company might contact you using another contact detail recorded in its system and verify your application.

CONTACT DETAILS

SteelOrbis Elektronik Pazaryeri A.Ş.

MERSIS (Central Registration) No: 0470048178400014

Contact us: info@steelorbis.com

Address: 19 Mayıs Mahallesi, Atatürk Caddesi Yamaç Sokak

Şeref Yazgan İş Merkezi, No:1, Kat: 7, D: 18

Kozyatağı – 34736 İstanbul, Turkey