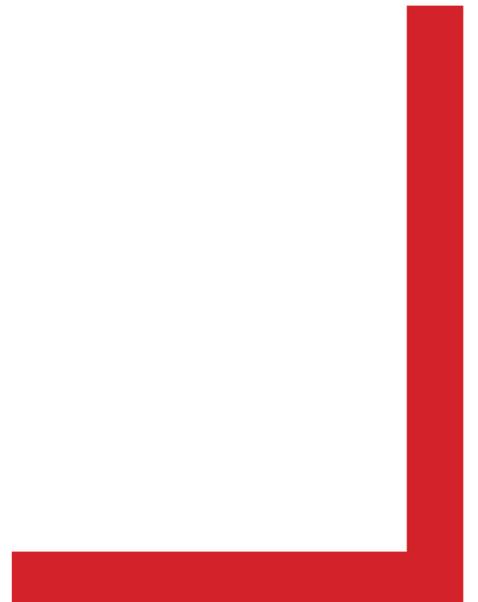




MallMark Real Estate

Protection and Processing of Personal Data

**General Policy
Clarification Text
Application Form**





OUR GENERAL POLICY ON LAW ON PROTECTION OF THE PERSONAL DATA

MallMark respects your privacy and cares about your data security. In this context, this text has been prepared in order to inform and enlighten you within the scope of the Law on Protection of Personal Data No. 6698 (“KVKK”) and other relevant legislation.

The "Law on the Protection of Personal Data" No. 6698 was adopted on March 24, 2016 and entered into force after being published in the Official Gazette on April 7, 2016. In addition, according to Article 32 of this law, Article 8, 9, 11, 13, 14, 15, 16, 17 and 18 came into force as of 7 October 2016.

The said law was adopted in order to protect the fundamental rights and freedoms of individuals, especially the privacy of private life, and to regulate the obligations of natural and legal persons who process personal data and the procedures and principles to be followed in the processing of personal data. With this text, MallMark informs and enlightens its visitors, and also presents the "Personal Data Protection and Personal Data Sharing Permission" for the information and examination of the visitors.

As MallMark, we accept, declare and undertake that we will not sell, rent or otherwise use your name, e-mail address, work and home address, telephone number and other personal data that you provide to us through the forms on this site.

This clarification text has been prepared by MallMark Gayrimenkul Kiralama ve Yönetim Anonim Şirketi as the data controller within the scope of Article 10 of the Personal Data Protection Law No. Our aim; to inform you about the methods of obtaining your personal data, the purposes of processing, the transfer to third parties, the legal reasons for our personal data processing and your rights.

MallMark respects your privacy and attaches importance to your data security. In this context, this text has been prepared in order to inform and enlighten you within the scope of the Personal Data Protection Law No. 6698 and other relevant legislation.

INFORMATION TEXT

The Law on Protection of Personal Data No. 6698 was adopted on March 24, 2016, and entered into force after being published in the Official Gazette on April 7, 2016. However, according to Article 32 of the Law; Articles 8, 9, 11, 13, 14, 15, 16, 17 and 18 came into force as of 7 October 2016.

It has been adopted in the law in order to protect the fundamental rights and freedoms of individuals, especially the privacy of private life, and to regulate the obligations of natural and legal persons who process personal data and the procedures and principles to be followed by these persons regarding the processing of personal data. With this text, MALLMARK not only informs and enlightens its visitors, but also presents the "Permission for Protection of Personal Data and Personal Data Sharing" for the information and examination of the visitors.



MALLMARK accepts, declares and undertakes that it will not sell, rent or make use of your name, e-mail address, work and home addresses, telephone number and other personal data provided by the visitors through the forms on this site to third parties.

Processing of Your Personal Data

Here, the processing of your personal data and all kinds of operations performed on the data such as the acquisition, recording, storage, preservation, modification, rearrangement, disclosure, transfer, takeover, classification or classification of your personal data completely or partially automatically or by non-automatic means provided that it is a part of any data recording system are meant.

Data Controller and Representative

In accordance with the law, personal data may be processed by MALLMARK as the data controller within the scope described in this text. MALLMARK is responsible for the establishment and management of the data recording system by determining the purposes and means of processing the personal data registered in the database. When the Data Controllers Registry is opened, it is declared that the data controller will be registered and it will be registered as a data controller.

Why Do We Process Your Data?

Your personal data is processed in accordance with the 5th and 6th articles of the said law in order to carry out the necessary operational activities within the company to ensure that the services offered by our company can be provided to you; to ensure the rights of real persons by providing human resources management by our company; for the necessary steps to be taken by our company in the making, implementation and realization of commercial decisions and to ensure the legal safety of the real persons with whom we have business relations and our company arising from these relations.

Your personal data may be processed by MallMark as a "data controller" without your explicit consent in the following cases:

- a) If persons who are unable to express their consent due to actual impossibilities or whose consent is not given legal validity have to protect their own or someone else's life or physical integrity
- b) If it is necessary to process the personal data of the parties to the contract, provided that it is directly related to the performance of the contract.
- c) If it is necessary to fulfill our legal obligations as a data controller.
- d) If it has been made public by the person concerned
- e) If data processing is necessary for the establishment, exercise or protection of a right



Provided that it does not harm the fundamental rights and freedoms of the data subject, the fact that data processing is mandatory for the legitimate interests of the data controller can be used for the following purposes, based on any of the conditions:

Your personal data may be processed for the following purposes;

- a) To communicate with you and others as part of the job
- b) To send you important information about changes to our terms of service, changes to our electronic services, and other administrative information
- c) To provide quality, training and safety improvements (for example, regarding recorded or monitored phone calls made to our contact numbers)
- d) To resolve complaints and process data access or correction requests
- e) To prevent, detect and investigate crime, including fraud and money laundering, and to analyze and manage other business risks
- f) Comply with applicable laws and regulatory obligations (including those outside your country of residence), including anti-money laundering and anti-terrorism laws; to comply with legal processes and respond to requests from government authorities (including those outside your country of residence)
- g) To manage our infrastructure and business operations and to comply with internal policies and procedures, including those linked to auditing, finance and accounting, billing and collections, computing systems, data and website hosting, business continuity and records, document and print management
- h) To establish and defend legal rights; to protect our operations or the activities of our business partners, our rights, privacy, security or property and/or your or others' such assets, and to take available remedies or limit our damage.
- i) To conduct market research and analysis, including satisfaction surveys
- j) To facilitate the social media sharing function

To Whom The Processed Personal Data Can Be Transferred And For What Purpose?

Your collected personal data can be transferred within the framework of the processing conditions and purposes specified in Articles 8 and 9 of Law on the Protection of Personal Data to ensure the legal and commercial security of our company and those who have a business relationship with our company; To our business partners, suppliers, shareholders, legally authorized public institutions and private individuals, in order for our business units to carry out the necessary work for you to benefit from the products and services offered by our company, for the determination and implementation of our company's commercial strategies and business strategies, and for the execution of our company's human resources policies.

Method and Legal Reason for Personal Data Collection

Your personal data is collected by our company in order to carry out our commercial activities through different channels and based on different legal reasons. Your personal data collected for these legal reasons can also be processed and transferred for the purposes specified in articles (b) and (c) of this text within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the Law on the Protection of Personal Data.

Rights of Personal Data Owners Listed in Article 11 of the Law on the Protection of Personal Data

As personal data owners, if you submit your requests regarding your rights to our Company through the methods set out in this clarification text and which we will see below, our company will conclude the request free of charge within thirty days at the latest, depending on the nature of this request. However, if a fee is foreseen by the Turkish Data Protection Authority, the fee in the determined tariff will be collected by our company. In this context, personal data owners;

The right to learn whether their personal data is processed,

If his personal data has been processed, the right to request information about it,

The right to learn the purpose of processing personal data and whether they are used in accordance with its purpose,

The right to know the third parties to whom personal data is transferred in the country or abroad,

The right to request correction of personal data in case of incomplete or incorrect processing and to notify the third parties to whom the personal data has been transferred,

Despite the fact that the personal data has been processed in accordance with the Law on the Protection of Personal Data and other relevant provisions of the law, in the event that the reasons requiring its processing disappear, to request the deletion or destruction of personal data and to request the notification of the transaction made within this scope to the third parties to whom the personal data has been transferred,

The person has the right to object to the emergence of a result against himself by analyzing the processed data exclusively through automated systems.

and has the right to demand the compensation of the damage in case of loss due to the unlawful processing of personal data.

APPLICATION FORM



In accordance with paragraph 1 of Article 13 of the Law on the Protection of Personal Data, you can send your request to our company to exercise your above-mentioned rights in writing or by other methods determined by the Personal Data Protection Board.

Since the Turkish Data Protection Authority has not determined any method at this stage, you must submit your application to our company in writing in accordance with the Law on the Protection of Personal Data.

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 Law on the Protection of Personal Data are explained below.

In order to exercise your rights stated above, your request, which includes the necessary information to identify you and your explanations about your right that you request to exercise from the rights specified in Article 11 of the Law on the Protection of Personal Data, must be sent to Mallmark Headquarters, Asmadalı Sk. No:3, 34718 Kadıköy/Istanbul, with documents identifying your identity by hand. Please send it via a notary public or other methods specified in the Law on the Protection of Personal Data, or send the relevant form to info@mallmark.com with secure electronic signature.