

COOKIE POLICY WITHIN THE SCOPE OF KVKK

Imperial Tobacco Turkey (“Company”), owns small data files that allow users to save and collect certain data to their computers, mobile phones, tablets or other devices used during the access to the websites, electronic platforms, applications or e-mail messages or advertisements sent by the Company. These data files placed on computers and other devices may be cookies, pixel tags, flash cookies and web beacons, as well as other similar technologies for data storage. “Cookie” term is used to refer to cookies and similar technologies that may be used by the Company in this Policy. Although it is possible to collect personal data through cookies, any data collected through cookies may not be personal data. For this reason, it should be taken into consideration that the data obtained through cookies will only be considered within the scope of this Law and the Protection of Personal Data Act (KVKK) to the extent that they constitute personal data under Turkish law.

1- Types of Cookies

Cookies can be classified by time or by the domain name they belong to, Cookies are divided into session cookies and permanent cookies if they are classified in time. Session cookies are cookies that are deleted when the user closes the browser, while persistent cookies are cookies left on the user's computer / device for a predetermined period of time. In the event that cookies are classified according to the domain they belong to, they are divided into related party cookie and third party cookie. Cookies are placed by the visited area are called related party cookies, while cookies are placed by a different area visited are referred to as third party cookies. A third party cookie is available if people outside the visited area place cookies on the user's device over the visited area.

2- Usage Purpose of Cookies

The Company may use the cookies in its websites, platforms, applications, advertisements and messages for the purposes stated below.

- a- **Usage of Operational Purpose:** We may use cookies that we deem necessary for the administration and security of the Company's website, platforms, applications and services. Examples of cookies used for operational purposes include technologies that enable the use of the functions on the website, applications and platforms, and cookies used to detect irregular behavior in these channels.
- b- **Usage for Functionality:** The Company may use cookies to facilitate the use of its website, platforms, applications and services and to customize it for users. Examples of technologies that enable us to remember user information and preferences are cookies that use functionality.
- c- **Performance oriented Usage:** The Company may use cookies in order to increase and measure the performance of the Company's website, applications, platforms and services. Examples of cookies used for this purpose include technologies that enable

us to understand how users use the Company's website, applications, platforms, and services, and to understand whether they are interacting with the messages we send with cookies that allow us to analyze user behavior.

- d- **Usage for Advertising purposes:** We may use party cookies and third party cookies related to the Company or any third party's web site, platform and applications to transmit ads and similar content to the interests of the users. Examples of advertising purposes include cookies that measure the effectiveness of ads, and cookies showing whether a particular ad was clicked or the number of times the ad was displayed.

3- Rejecting and Deleting Cookies

While most browsers allow the use of cookies, users can change or delete cookies at any time by changing their browser settings. The method of changing the settings depends on the browser used, and how the cookies can be disabled should be learned from the service provider for the used browser.

In the event that cookies are disabled, some features of the Company website, applications, platforms and services may not be utilized.

4- Authorized Service Providers

We may obtain assistance from some service providers that we authorize to conduct and promote the Company's website, platforms and applications and services. These service providers will be able to place cookies and similar technologies (third party cookies) on the user's computer / device and collect information such as the IP address, unique identifier and device identifier to identify the user device.

5- Third Party Site, Products and Services

Company websites, platforms and applications may contain links to third party websites, products and services. These links are subject to the privacy policies of third parties and should be aware that the third party and third party sites are independent of the Company and that the Company is not responsible for the privacy practices of third parties. In case of visiting the linked websites, we recommend reading the privacy policies of these sites.