

INFORMATION TEXT ABOUT PROTECTION OF PERSONAL DATA

Pursuant to the Law on Protection of Personal Data no. 6698 (“KVKK”), we, the undersigned, as Imperial Tobacco Turkey acting as *Data Responsible* for the purposes hereof, hereby declare that your personal data and information will be recorded, kept, and, and may be disclosed/**transferred** to third parties, or be classified, and be processed as otherwise as specified in (KVKK), if and to the extent permitted by the applicable laws, and within the frame described here below.

This information text consists of;

- **Personal Data:** Any information relating to a specific or identifiable natural person,
- **Law on Protection of Personal Data (“KVKK”):** Law No. 6698 on the Protection of Personal Data published in the Official newspaper of Turkish Republic on the date of 07.04.2016
- **Data responsible:** The natural or legal entity who determines the purposes and means of processing the personal data and who is problematic from the establishment and management of the data recording system,
- **Data Processor:** Expresses the natural or legal entity who process the Personal data on his behalf based on the authority granted by the Data responsible.

Data responsible:

According to KVKK, addressee, supplier, customer, employee, trainee, visitor etc. Your personal data that you share with the additives is determined by Imperial Tobacco Turkey will be evaluated by the legal entity within the scope specified below.

1. Collection, Processing and Business Purposes of Personal Data

Your personal data may vary depending on the relationship between you and our Company; Our Company may collect through oral, written or electronic means by means of automated or non-automated methods, units, website, social media channels, mobile applications and written, oral or electronic ways with similar means. Your personal data will be created and updated as long as your relationship with our Company continues.

Your personal data are collected by the relevant business units, the legal and commercial security of the Company and our business relations with the Company, the determination and implementation of our Company's strategies and the execution of the human resources policies of our Company. In accordance with the KVKK Article No. 5. and 6. personal data processing requirements and purposes,

- In accordance with the rules of law and integrity,
- Accurate and up-to-date,
- For specific, clear and legitimate purposes,
- Linked to the purpose of the process, limited and measured

- to be kept for the period stipulated in the relevant legislation or for the purpose for which they were processed

It will be processed in accordance with the rules mentioned above .

2. To whom and to what purpose the personal data would be processed:

Your personal data collected; In order to ensure the legal and commercial security of the Company and the business relations of the Company and the business and business strategies of our Company and your Company, we shall provide our business partners, suppliers, legally authorized public institutions and private individuals in accordance with the personal data processing requirements and objectives specified in Articles No. 8 and 9 of the KVKK.

3. Method and the legal reason of collecting personal data:

Your personal data, all kinds of verbal, written or electronic media/environment, in accordance with the above mentioned purposes to offer our services within the scope of our company's contract and the liability of the law fully and accurately acquired in order to be fulfilled. Your personal data collected for this legal reason may be processed and transferred for the purposes specified in articles (1) and (2) of this text in accordance with the personal data processing requirements and purposes set out in Articles 5 and 6 of the ("KVKK") Law.

4. Your rights arising out of article 11 of KVKK:

As personal data holders, if you submit your requests for your rights to our Company by the methods set out below, our Company will finalize it free of charge within 30 days at the latest. However, if a fee is stipulated by the Personal Data Protection Board, the fee set by our Company will be charged. In this context,

You have the right to apply to our Company and

- a) to learn whether your personal data and information are processed or not, and
- b) if processed, to request information in connection therewith, and
- c) to learn the purpose of processing and whether such data are used for the intended purposes or not, and
- d) to learn the identity of third parties who received such data at home or at abroad, and
- e) if your data are under processed or misprocessed, to demand correction of them, and
- f) to demand deletion/destruction of such data under the conditions specified in Article 7 of KVKK, and
- g) to request notification of transactions effected pursuant to subparagraphs (f) and (e) hereinabove to persons to whom the data are transferred, and
- h) to object against a result obtained in disfavor of you due to analysis of such data solely via automatic systems, and
- i) if you incur damages due to processing of your data in violation of the laws, to demand indemnification of your damages. Your rights arising out of this Article will enter into force

Pursuant to Article 13 (1) of the Law, you may submit your request for using your rights mentioned above, in written or personal data, through other methods determined by the Protection Board. Since the Personal Data Protection Board does not specify any method at this stage, you must submit your application in writing to our Company in accordance with the CMLP. In this context, the channels and procedures in which you will submit your application in writing to our Company within the scope of Article 11 of the KVKK are described below.

Your request, including your right to use your rights and the information required to identify your identity and use the rights specified in Article 11 of the KVKK, in a clear and comprehensible manner, including the identification and documentation of the identification and address information. You must send it to kvkk@tr.imptob.com or **Keçiliköy OSB Mahallesi Ahmet Tütüncüođlu Caddesi No:11 MOSB 3.Kısım Yunusemre / Manisa** by mail or notary, written and wet signed by hand,.

Kind regards,

Imperial Tobacco Turkey