

**ZEREN GROUP YATIRIM HOLDİNG ANONİM ŐİRKETİ  
PERSONAL DATA PROTECTION AND PROCESSING POLICY**

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## **1. ARTICLE 1 - INTRODUCTION**

### **1.1. INTRODUCTION**

Protection of personal data is one of the most important priorities of Zeren Group Yatırım Holding Anonim Şirketi ("the Company"), and our Company shows maximum effort to comply with all applicable legislation in this regard. The most important component of this issue is this Zeren Group Yatırım Holding Anonim Şirketi Personal Data Protection and Processing Policy ("Policy").

The principles adopted in the execution of the personal data processing activities carried out by our Company within the framework of this Policy and the basic principles adopted in terms of the compliance of our Company's data processing activities with the Law No. 6698 on the Protection of Personal Data ("Law") are explained and thus it provides the necessary transparency by informing the personal data subjects. It provides. The personal data of yours is processed and protected under this Policy with full awareness of our responsibility in this context

### **1.2. SCOPE**

This Policy pertains to all personal data of people other than employees of our Company, which are processed automatically or non-automatically, provided that they are part of any data recording system.

It is possible to reach detailed information about the personal data subjects from the Annex-1 ("Annex 1- Personal Data Subjects") document of this Policy.

The activities of our Company regarding the personal data protection of our employees are managed under The Personal Data Protection and Processing Policy of Zeren Group Group Employees, which are written in line with the principles in this Policy.

## **2. ARTICLE 2 - TERMS RELATED TO THE PROCESSING OF PERSONAL DATA**

### **2.1 Processing of Personal Data in accordance with the Principles set forth in the Legislation**

#### **2.1.1. Processing in accordance with The Law and Rules of Bona Fides**

Personal data are processed in accordance with the general trust and bona fides rule, without damaging the fundamental rights and freedoms of individuals. Within this

framework, personal data are processed to the extent required by our Company's business activities and to a limited extent.

### **2.1.2. Providing Personal Data Accuracy and Up-to-dateness When Required**

Our company takes the necessary precautions to keep the personal data accurate and up to date during the processing and establishes the necessary mechanisms to ensure the accuracy and currency of the personal data for certain periods.

### **2.1.3. Processing for Specific, Explicit and Legitimate Purposes**

Our company clearly reveals the purposes of processing personal data and operates in line with the business activities within the scope of purposes related this activities.

### **2.1.4. Being Relevant with, Limited to and Proportionate to The Purposes for which They are Processed**

Our company collects personal data only in the quality and proportion required by business activities and processes it for the determinated limited purposes.

### **2.1.5. Being retained for the period of time stipulated by relevant Legislation or the purpose for which they are processed**

Our company retains personal data for the time required for the purpose for which they are processed and for the minimum period stipulated in the relevant legal legislation. In this context, our Company firstly determines whether a period is stipulated for the storage of personal data in the relevant legislation, and if it has been determined for a while, it acts accordingly. If a legal period is not stated, personal data is maintained for the time required for the purpose for which they were processed. Personal data are destroyed at the end of the specified retention periods in accordance with the periodic destruction periods or the data subject's application and with the specified destruction methods (erasure and / or destruction and / or anonymization).

## **2.2 PROCESSING OF PERSONAL DATA**

The explicit consent of the personal data subject is only one of the legal bases that makes it possible to process personal data in accordance with the law, and in the presence of one of the conditions below, the personal data is processed by our Company without the explicit consent of the data subject.

Apart from explicit consent, the basis of the personal data processing activity can be only one of the following conditions, and multiple conditions can be the basis of the same personal data processing activity. In the event that the processed data is of special nature, the conditions in the 2.3 title of this Policy ("*Processing of Personal Data of Special Nature*") will be applied.

### **2.2.1 Explicitly Provided by Laws**

If it is explicitly stipulated by the law, in case there is an explicit provision regarding the processing of personal data in other words, the personal data of the data subject can be processed by our Company within the framework stipulated in the legislation.

#### **2.2.2 Failure to Obtain Explicit Consent of the Concern Due to Actual Impossibility**

Personal data of the data subject can be processed if it is mandatory for the protection of life or physical integrity of the person or of any other person who is bodily incapable of giving his consent due to actual impossibility or whose consent is not deemed legally valid.

#### **2.2.3 Directly Relation to Establishment of the Contract or Its Execution**

Provided that the data subject is directly related to the establishment or performance of a contract to which it is a party, this condition may be deemed to have been fulfilled if it is necessary to process the personal data.

#### **2.2.4 Fulfillment of the Company's Legal Obligation**

If data processing is mandatory for our company to fulfill its legal obligations, personal data of the data subject can be processed.

#### **2.2.5 Personal Data Subject to Publicize His Personal Data**

If the data subject has publicized his personal data, the relevant personal data may be processed limitedly for the purpose of publicizing.

#### **2.2.6 Data Processing is Mandatory to Establish or Protect a Right**

If data processing is mandatory for the establishment, exercise or protection of a right, the personal data of the data subject can be processed.

#### **2.2.7 Data Processing is Mandatory for the Legitimate Interest of our Company**

If the data processing is mandatory for our Company's legitimate interests, the personal data of the data subject can be processed, provided that it does not harm the fundamental rights and freedoms of the personal data subject.

### **2.3 Processing of Personal Data of Special Nature**

Special attention has been attributed to the personal data that are sensitive under the law, because of the risk of causing victimization or discrimination of individuals when it is illegally processed. These "Special Nature" of personal data; These are data on race, ethnic origin, political thought, philosophical belief, religion, sect or other beliefs, disguise and dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data.

Personal data of Special Nature are processed by our Company in accordance with the principles set forth in this Policy and by taking all necessary administrative and technical

measures, including the methods to be determined by the Board, and in the presence of the following conditions:

- i)** Personal data of Special Nature other than health and sexual life can be processed without explicit consent of the data subject in the event that it is stipulated by The Laws in other words there is an explicit provision in the law related to the processing of personal data. Otherwise, the explicit consent of the data subject will be obtained.
- (ii)** Personal personal data related to health and sexual life, for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, health services and planning and management of financing, by persons who are under the obligation to keep secrets or authorized institutions and organizations can be processed without seeking explicit consent. Otherwise, the explicit consent of the data subject will be obtained.

#### **2.4 Personal Data Categories Processed and Purposes of Processing**

It is possible to access the personal data categories and detailed information about these categories processed in accordance with the Law and other relevant legislative provisions within the framework of the purposes and conditions set forth in this Policy from Annex-2 ("Personal Data Categories") document of this Policy.

The personal data processing purposes of our Company are as follows within the scope of the processing conditions of personal data and personal data of special nature detailed in this Policy in accordance with the Law and other relevant legislation:

- 1.** Planning and / or enforcing our company's human resources policies and processes,
- 2.** Planning and / or execution of the activities of the legal and technical security of our company and the persons who have a business relationship with our Company,
- 3.** Planning and / or execution of the activities required for the suggestion and promotion of the products and services offered by our company and / or on behalf of our Company to the relevant people by customizing them according to their likes, usage habits and needs,
- 4.** Carrying out the necessary studies and carrying out the relevant business processes for the relevant individuals to benefit the products and / or services offered by our Company and / or on behalf of our Company,
- 5.** Carrying out the necessary works by our relevant business units and carrying out business processes to provide the commercial and / or operational activities managed by our company,
- 6.** Planning and / or execution of our company's commercial and / or business strategies.

It is possible to reach detailed information about the mentioned personal data processing purposes from the **Annex-3 ("Annex 3- Personal Data Processing Purposes")** document of this Policy.

### **3. ARTICLE 3 – TERMS RELATED TO THE TRANSFER OF PERSONAL DATA**

Our company may transfer the personal data and personal data of special nature belonging to the personal data subject to third parties by taking the necessary security precautions in line with the purposes of personal data processing in accordance with the Law. In this direction, our company acts in accordance with the regulations stipulated in the 8th and 9th articles of the Law. Detailed information on this matter can be found in Annex 4 of this Policy (**"ANNEX 4- Third Parties which Personal Data is Transferred by Our Company and Transfer Purposes"**).

### **3.1 Transfer of Personal Data**

Even if the personal data subject does not give explicit consent, personal data may be transferred to third parties by taking necessary care by our Company and taking all necessary security measures, including methods prescribed by the Board, if one or more of the following conditions exist.

- Explicitly stipulating the relevant activities regarding the transfer of personal data in the Laws,
- The transfer of personal data by the Company is directly related with and mandatory for the
- establishment or fulfillment of a contract,
- The transfer of personal data must be mandatory for our Company to fulfill its legal obligations,
- Transfer of personal data by our Company for the limited purpose of publicization, provided that it is publicized by the data subject,
- The transfer of personal data by the Company is mandatory for the establishment, exercise or protection of the rights of the Company or data subject or third parties,
- It is mandatory to carry out personal data transfer activities for the legitimate interests of the Company, provided that it does not harm the fundamental rights and freedoms of the data subject,
- • It is mandatory for the protection of life or physical integrity of the person or of any other person who is bodily incapable of disclosing his consent due to actual impossibility or whose consent is not deemed legally valid.

If Personal data is transferred abroad ,in addition to the conditions set out above, the data shall be transferred by our company to Foreign countries where have been announced having sufficient level of protection by The Board ( **"Sufficient Protection with Foreign Countries"**) or in case of the absence of adequate protection, The Foreign countries where The Data Controllers in Turkey and in The related Foreign Countries gurantees the sufficient protection in a written form and where the permission of the Board exists (**"Foreign Country where the Data Controllers Undertaking the Sufficient Protection is Provided"**)

### **3.2 Transfer of Personal Data of Special Nature**

Personal data of Special Nature are transferred by our Company in accordance with the principles set forth in this Policy and by taking all necessary administrative and technical

measures, including the methods to be determined by the Board, and in the presence of the following conditions:

- i) **Personal data of Special Nature other than health and sexual life** can be transferred without explicit consent of the data subject in the event that it is stipulated by The Laws in other words there is an explicit provision in the law related to the processing of personal data. Otherwise, the explicit consent of the data subject will be obtained.
- ii) **Personal personal data related to health and sexual life**, for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, health services and planning and management of financing, by persons who are under the obligation to keep secrets or authorized institutions and organizations can be transferred without seeking explicit consent. Otherwise, the explicit consent of the data subject will be obtained.

If personal data of special nature is transferred abroad, in addition to the above conditions, special personal data shall be transferred to Foreign Countries which have Sufficient Protection Level or to Foreign Countries where Undertaking Sufficient Protection is provided by the data controller.

#### **4. ARTICLE 4 – CLARIFICATION OF THE PERSONAL DATA SUBJECT**

In accordance with Article 10 of the Law and secondary legislation, our company informs personal data subjects regarding who are processed as data controller for their personal data, for what purposes, with whom for which purposes it is shared, with which methods, and the legal reason and the rights of the data subjects within the scope of the processing of their personal data.

#### **5. ARTICLE 5- RETAINING AND DESTRUCTION OF PERSONAL DATA**

Our company maintains personal data for the time required for the purpose for which they are processed and for the minimum period stipulated in the relevant legal legislation. In this context, our Company firstly determines whether a period is stipulated for the maintaining of personal data in the relevant legislation, and if it is determined for a period of time, our company acts accordingly. If a legal period is not stated, personal data is retained for the time required for the purpose for which they were processed. Personal data are destroyed at the end of the specified retention periods in accordance with the periodic destruction periods or the data subject's application and with the specified destruction methods (erasure and / or destruction and / or anonymization).

#### **6. ARTICLE 6- TERMS REGARDING PERSONAL DATA PROTECTION**

In accordance with article 12 of the Law, our company takes necessary measures according to the nature of the data to be protected in order to prevent the disclosure, access, transfer or other security deficiencies that may occur in other ways. In this context, our Company takes administrative measures, makes audits or has it made audits in order to provide the necessary level of security in accordance with the guides published by the Personal Data Protection Board ("**Board**").

In this context, the technical and administrative measures taken by our Company for the protection of personal data are carefully implemented in terms of personal data of special nature and necessary controls are provided within our Company.

### **6.1 Raising Awareness of Business Units on the Protection and Processing of Personal Data and The Audit**

Our company provides the necessary training for business units to raise awareness to prevent personal data from being processed unlawfully, to prevent illegal access to the data and to provide the data protection.

Our company establishes the necessary systems for the personal data protection awareness of its current employees and new employees participating in the company structure and works with consultants if there is necessity regarding the subject. In this regard, our Company evaluates the participation in relevant trainings, seminars and information sessions and organizes new trainings in parallel with the update of the relevant legislation.

## **7. ARTICLE 7 - RIGHTS OF PERSONAL DATA SUBJECTS AND EXERCISE OF THESE RIGHTS**

### **7.1 RIGHTS OF THE PERSONAL DATA SUBJECT**

Personal data subjects have the rights below:

- 1) To learn whether personal data is processed or not,
- 2) If the personal data are processed, to request information about it,
- 3) To learn the purpose of his data processing and whether this data is used for intended purposes,
- 4) To know the third parties to whom personal data are transferred domestically or abroad,
- 5) To request rectification of personal data in case of incomplete or incorrect processing, and requesting notification of the transaction performed within this scope to third parties to whom personal data has been transferred,
- 6) Despite the fact that it has been processed in accordance with the provisions of the Law and other relevant Laws, to request the erasure or destruction of personal data in case the purpose requiring its processing does not exist and to request informing the third parties to whom the personal data has been transferred,
- 7) To object to the processing, exclusively by automatic means, of his personal data, which leads to an unfavourable consequence for the data subject,
- 8) To request the compensation of the damage raising from the unlawfull processing of his personal data.

**7.2 EXERCISE OF PERSONAL DATA SUBJECT RIGHTS**

Personal data subjects will be able to submit their requests regarding their rights listed in section 7.1 ("Rights of the Personal Data Subjects") to our Company by the methods determined by the Board. Accordingly, they will be able to utilize the "Data Subject Application Form", which can be accessed at the address of <https://www.zerengroup.com/>

**7.3 OUR COMPANY'S REPLY TO APPLICATIONS**

Our company takes the necessary administrative and technical measures to finalize applications made by the personal data subjects in accordance with the Law and secondary legislation.

In the event that the personal data subjects submits the request regarding the rights in section 7.1 ("**Personal Data Subject Rights**") to our Company in accordance with the procedure, our Company shall conclude the related request free of charge as soon as possible and within 30 (thirty) days at the latest. However, if the transaction requires a separate cost, a fee may be charged in accordance with the schedule set by the Board.

**ANNEX-1 PERSONAL DATA SUBJECTS**

CATEGORY OF DATA SUBJECT	DEFINEMENT
<b>Employee/Intern Candidate</b>	: It is a real person who has applied for a job position in our company by any means or has shared his/her CV and related information with our Company for review.
<b>Former Employee</b>	: It is a real person whose employment contract with our company has been terminated due to any reasons such as withdrawal, dismissal, retirement.
<b>Customer</b>	: It is a real person who uses, has used or applies for the usage of the products or services provided by our company, or whose application is in the process of evaluating or who is an employee or representative or shareholder of real persons or a legal entities.
<b>Potential Customer</b>	: It is a real person who is an employee, representative or shareholder of real or legal persons who have not requested or interested in using our products or services and who have been evaluated in accordance with the commercial customs and Bona Fides Rules that he/she might have this interest.
<b>Event Participant</b>	: It is a real person who participates in events, organizations and similar activities organized by our company.
<b>Opinion/ Complaint/ Suggestion Request Holders</b>	: It is a real person who conveys his/her opinions / suggestions or information and other requests to our Company whether or not they have utilized our Company's Products and Services.
<b>Visitor</b>	: It is a real person who visits our company's premises, websites or has joined the guest internet network of our Company.
<b>Campaign/ Contest Participant</b>	: It is a real person who participate the campaigns and the contests that our Company has organized.
<b>Relatives of Data Subjects</b>	: Those who are family members or relatives of our employees or the persons utilizes the products and/or the services of our Company.
<b>Supplier Employee / Authority / Shareholder</b>	: It is a real person who is the shareholders, representatives or employees of the companies that provides goods and/or services to our Company based on the current and/or the future agreements to be conducted with our Company.

<b>Employee / Representative / Shareholder of Business Partner</b>	:	These are real persons who are shareholders, representatives, or employees of companies with whom we have partnered for purposes such as sales, promotion and marketing of our Company's products and services after-sales support and execution of joint customer loyalty programs while conducting commercial activities of our Company.
<b>Other Third Parties</b>	:	They are the real persons and the third Parties who are included within This Policy and not covered by The Personal Data Protection and Processing Policy of Zeren Group Group Employees.

## ANNEX-2 DATA PROTECTION CATEGORIES

DATA PROTECTION CATEGORIES		DEFINEMENT
<b>Identify Information</b>	:	It refers to the data that contains information about the person's identity. (Documents contains Name-Surname, T.R. identification number, nationality information, mother name-father name, birthplace, date of birth, gender, such as driver's license, identity card and passport, and tax number etc.)
<b>Contact Information</b>	:	Phone number, address, e-mail, IP address and similar contact information.
<b>Financial Information</b>	:	These are personal data processed regarding the information, documents and records that show all kinds of financial results created according to the type of legal relationship established with the personal data subject of our company and data such as bank account number, IBAN number, credit card information, financial profile, assets data, income information.
<b>Client Information</b>	:	These are the data regarding the taxpayers who benefit from our consultancy services during the operation of our Financial Consultancy activities.
<b>Customer Transaction Information</b>	:	It means information regarding records of products and service usage as well as the instructions and requests of our customers regarding the use of our products and services.
<b>Transaction Security Information</b>	:	These are personal data (Log records, passwords and codes, etc.) processed in order to ensure our technical, administrative, legal and commercial security while conducting our commercial activities.
<b>Legal Actions and Compliance Information</b>	:	These are personal data processed within the scope of determination and follow-up of legal receivables and rights, performance of our debts, our legal obligations and compliance with our Company's policies.
<b>Request/ Complaint Management Information</b>	:	It means personal data regarding the receipt and evaluation of any requests and / or complaints addressed to our company.
<b>Visual and Auditory Data</b>	:	It is data which has visual or auditory quality such as photographs, camera / sound recordings.
<b>Physical Place Security Information</b>	:	These are personal data such as camera records, visitor records related to documents such as fingerprints taken during the stay in the physical place, at the entrance to the physical place.
<b>Audit and Supervision Information</b>	:	Personal data processed during internal or external audit activities within the scope of our company's legal obligations and compliance with company policies
<b>Employee Candidate Information</b>	:	It is the personal data of those who have applied for a job position in our company in any way, or the candidates of employees and / or trainees, such as CVs and interview notes.
<b>Vehicle Information</b>	:	These are data such as license plates related to the vehicles associated with the data subject.
<b>Location Data</b>	:	It is personal data such as GPS location, travel data, which determines the location of our employees and employees of the institutions we cooperate while using our Company's vehicles.
<b>Family Members and Relatives Information</b>	:	These are personal data about the family members (spouse, mother, father, child), their relatives and other persons who can be reached in case of

	emergency, in order to protect the legal and other interests of our company and data subject within the framework of the operations carried out by the business units of our company.
<b>Marketing Information</b> :	It means the personal data processed for the customization and marketing of our products or services in accordance with the usage habits, tastes and needs of the personal data subject, and the reports and evaluations created as a result of these processing results.
<b>Personal Data of Special Nature</b> :	These are the data specified in Article 6 of the Law (health data, biometric data, religion, associations, etc.).

### ANNEX-3 PURPOSES OF PERSONAL DATA PROCESSING

MAIN PURPOSES (PRIMARY)	SUB-PURPOSES (SECONDARY)
<b>Planning and / or enforcing our company's human resources policies and processes.</b>	Planning and / or executing employee performance / talent assessment processes.
	Planning and / or carrying out the application, selection and evaluation processes of employee candidates.
	Follow-up and/or supervision the business activities of the employees.
	The planning and/or exercising of side benefits and rights related to the employees.
	Creating of personal records of employees of subcontractors, planning and / or execution of audit and / or follow-up activities
	Planning and / or execution of necessary operational activities related to discipline / ethical processes
	Planning and / or execution of internal / external training activities
<b>Planning and / or execution of the activities of the legal and technical security of our company and the persons who have a business relationship with our Company</b>	Planning and / or execution of operational activities required to ensure that company activities are carried out in accordance with Company procedures and / or applicable legislation.
	Planning and / or execution of company and partnership law operations
	Follow-up of Legal Actions
	Planning and / or execution of activities to provide and record information or documents and requests coming from official institutions and / or organizations.
	Planning and / or execution of emergency and / or incident management processes
	Planning and / or execution of legal and commercial risk detection activities
	Ensuring the security of company operations.
	Planning, auditing and / or execution of information security processes.
	Establishment and / or management of information technologies infrastructure.
	Planning and / or execution of our company's internal / external audit, inspection, investigation and / or control activities
	Follow-up of contract processes and / or legal requests
	Ensuring the security of company fixtures and / or resources.
	Ensuring the security of company premises and / or facilities
Creation and / or follow-up of visitor records.	

<p><b>Planning and / or execution of the activities required for the suggestion and promotion of the products and services provided by the Company and / or on behalf of our Company to the relevant people by customizing them according to their likes, usage habits and needs.</b></p>	<p>Planning and / or execution of market research activities for the sales and / or marketing of products and services.</p>
<p><b>Carrying out the necessary studies and conducting required business processes, for related individuals to utilize the products and / or services provided by our company and / or on behalf of our Company.</b></p>	<p>Creating and / or follow-up of the application and / or sales processes to products and / or services</p> <p>Planning and / or executing activities for customer satisfaction and / or experience</p> <p>Evaluation of customer requests and / or complaints collected in digital and / or by other means.</p> <p>Planning and / or execution of activities related to the return / renewal / repair of products</p> <p>Planning and / or execution of activities to take security measures related to products and services</p>
<p><b>Carrying out required studies by our relevant business units and related business processes in order to perform the commercial and / or operational activities undertaken by our company,.</b></p>	<p>Planning and / or execution of events and / or organizations for product / service promotion purposes.</p> <p>Follow-up of financial and / or accounting transactions.</p> <p>Planning and / or execution of the operations in terms of the activity / efficiency and / or on-site analysis of business activities.</p> <p>Planning and / or execution of corporate management activities</p> <p>Planning and / or execution of business continuity activities</p> <p>Planning and / or execution of stock and / or shipment processes of our company's products</p> <p>Planning and / or execution of purchasing processes</p> <p>Planning and / or execution of corporate communication activities</p> <p>Planning and / or execution of supply chain management processes</p> <p>Planning and / or execution of business activities</p> <p>Planning and / or execution of sponsorship activities</p> <p>Planning and / or execution of social responsibility and / or civil society activities</p> <p>Planning and / or execution of operations and / or efficiency processes</p> <p>Definition and / or audit of our employees' and the persons' outside of the company access to information.</p> <p>Planning and / or execution of internal / external reporting activities.</p>
<p><b>Planning and / or execution of our company's commercial and / or business strategies</b></p>	<p>Management of relations with business partners and / or suppliers.</p> <p>Budget works and / or execution</p> <p>Planning and / or execution of the company's financial risk processes</p> <p>Planning and / or execution of risk assessment activities and / or feasibility studies for potential partner / supplier / subcontractor selection</p>

## ANNEX- 4 THIRD PERSONS TO WHOM PERSONAL DATA WAS TRANSFERED AND TRANSFER PURPOSES

Data Transfer Persons	Definiton	Purpose of the Data Transfer
<b>Suppliers</b>	<p>Within the scope of conducting the commercial activities of our company, it means the parties providing services to our Company in accordance with the data processing purposes and instructions of our Company.</p> <ul style="list-style-type: none"> <li>• In this context, Zeren Group Yatırım Holding Anonim Şirketi provides services to our Company within the scope of human resources, establishment and security of information systems, and monitoring of legal presedures, and personal data is shared with Zeren Group Holding Anonim Şirketi for limited purposes.</li> <li>• As part of the implementation of payment by banks or other financial institutions in the Banks Association of Turkey, the personal data is shared.</li> </ul>	<p>Limited personal data are transferred in order to ensure that it is provided outsourced services to our Company, which are outsourced by the supplier and necessary.</p>
<b>Business Partners</b>	<p>During carrying out the commercial activities of our company, it means the parties that our company cooperates with for purposes such as sales, promotion and marketing of its products or services, after sales support, and execution of joint customer loyalty programs.</p>	<p>Personal data are transferred in a limited way to ensure the purpose of establishing the business partnerships.</p>
<b>Group Companies</b>	<p>Those means group companies that are affiliated with Zeren Group Anonim Şirketi.</p> <p>You can reach the group companies affiliated to Zeren Group Yatırım Holding Anonim Şirketi from the list takes place at the address of <a href="https://www.zerengroup.com/">https://www.zerengroup.com/</a></p>	<p>Within the scope of employee candidate evaluations, personal data are transferred to Zeren Group Yatırım Holding Anonim Şirketi directly or indirectly to the group companies that are affiliated with the consent of the employee candidate.</p>
<b>Shareholders</b>	<p>It means shareholder of Zeren Group Holding Anonim Şirketi, which is authorized to design the strategies and audit activities of our Company's commercial activities in accordance with the relevant legislation provisions.</p>	<p>As per the relevant legislative provisions, personal data are transferred limited to the design of the strategies regarding the commercial activities of our Company and for audit purposes.</p>
<b>Legally Authorized Public Institutions and Organizations</b>	<p>It means the public institutions and organizations authorized to receive information and documents from our Company in accordance with the relevant legislation provisions.</p>	<p>Personal data are transferred in a limited way for the purpose requested by the relevant public institutions and</p>

	<ul style="list-style-type: none"> <li>Courts, security agencies, tax offices, etc.</li> </ul>	organizations within the legal authority.
<b>Legally Authorized Private Institutions and Organizations</b>	It means the institutions or organizations that have been established in accordance with certain conditions determined considering with the provisions of the relevant legislation and that continue their activities within the framework determined by the law.	Within the scope of the activities carried out by the relevant private institutions and organizations, personal data is transferred for the purpose of providing rights and side benefits.