

CLARIFICATION TEXT

1. DATA CONTROLLER AND PERSONAL DATA PROTECTION

We, Alyat Teknoloji Yatırımları Holding A.Ş. (“Alyat”), attribute utmost importance to the protection of your personal data with the awareness of our status as a data controller pursuant to the Personal Data Protection Law no. 6698. For this reason, as Alyat, we take necessary precautions to protect the privacy and ensure safety of personal data of the entire individuals whose data are processed by our company.

Your personal data are processed pursuant to the relevant legislation within the framework of the Personal Data Protection Policies implemented by Alyat.

2. PERSONAL DATA PROCESSING ACTIVITIES OF OUR COMPANY

The information covered within this present clarification text contains those issues that may be implemented through the processing activities of our company, and when needed, the clarification texts specific to relevant persons or circumstances will be delivered to related persons.

2.1. General Processing Activities

Our company processes personal data with a view to conducting the activities fundamentally required by our business processes and commercial activities, protecting our rights and interests, fulfilling our legal obligations, and following up and concluding the procedures related with the applications submitted at our company.

In line with these purposes, personal data can from time to time be shared with our business partners, suppliers, Alarko Group of Companies, shareholders, authorized institutions and agencies.

Personal data can be obtained in physical and electronic media and via automated and non-automated methods.

The legal basis for collecting personal data may vary from one processing activity to the other, but can be at least one of those legal bases defined by the relevant legislation (Articles 5 and 6 of Personal Data Protection Law).

2.2. Processing Activities Peculiar to Data Subjects

2.2.1. Candidate Employees

Personal data of the candidate employees are processed in order to evaluate the job applications and manage the human resources processes.

Establishment of a contract within the scope of the application, Alyat’s legitimate interests, and in some cases explicit consent constitute the legal basis for collecting personal data

The third persons to whom personal data can be transferred and the purposes of the transfer to third persons are mentioned below:

Group of Recipients	The Purpose of Transfer
Alarko Group Companies	Based on your preference, the evaluation of your job application by relevant group companies
Test Service Providers	Implementing the relevant test within the scope of personality inventory

2.2.2. Suppliers and Consultants

Personal data of our suppliers and consultants as well as their employees and authorized representatives are processed with a view to defining the suppliers within the scope of business processes, communicating the suppliers, making the payments, conducting the proposal processes,

conducting the investments processes, fulfilling tax obligations, registering the commercial activities, planning the services and trainings, reaching an agreement on financial transactions, and establishing and performing the contracts.

Alyat's legitimate interests, establishment or performance of contract, the use of Alyat's legal obligations and rights constitute legal bases for collecting personal data.

The third persons to which personal data may be transferred and the purposes of transferring data to these third persons are given below:

Group of Recipients	The Purpose of Transfer
Banks	Payments and the implementation of other financial transactions
Alarko Group Companies, sub-contractor security company and their employees	Establishment and performance of the contract, organizational planning, and accessing Alarko's central campus
Revenue Administration, independent auditing firms, and legally authorized institutions and agencies	Fulfilling legal obligations

2.2.3. Commercial Customers and Business Partners

Personal data of our commercial customers and business partners as well as their employees and authorized representatives are processed with a view to defining the commercial customers within the scope of business processes, communicating the commercial customers, making the payments, conducting the proposal processes, conducting the investments processes, fulfilling tax obligations, registering the commercial activities, planning the services and trainings, reaching an agreement on financial transactions, and establishing and performing the contracts.

Alyat's legitimate interests, establishment or performance of contract, the use of Alyat's legal obligations and rights constitute legal bases for collecting personal data.

The third persons to which personal data may be transferred and the purposes of transferring data to these third persons are given below:

Group of Recipients	The Purpose of Transfer
Alarko Group Companies, sub-contractor security company and their employees	Establishment and performance of the contract, organizational planning, and accessing Alarko's central campus
Revenue Administration, independent auditing firms, and legally authorized institutions and agencies	Fulfilling legal obligations

2.2.4. Website Visitors

2.2.4.1. General Remarks

Personal data of the visitors of our website www.alarkoventures.com are processed with a view to providing better, rapid, and secure experience and/or new properties via our website, collecting statistical data on the use of our website, and improving our website.

Personal data are collected via automated methods during the visit to our website and Alyat's legitimate interests constitute the relevant legal basis.

The third persons to whom personal data may be transferred and the purposes of this transfer are given below:

Group of Recipients	The Purpose of Transfer
Service providers and business partners from whom we procure services like accommodation and analytics	Accessing the website, obtaining statistical data, developing the website user's experience

2.2.4.2. Use of Cookies

Cookies are the small text files recorded into your device in order for the websites to recall your preferences and some of your information during your future visits. When you visit a website for the first time a cookie is recorded into your device via your browser. If you visit the same website with the same device your browser checks whether any cookie is found in your device which was recorded in the name of the website, and conveys the data kept inside the record to the website that you are visiting. This will help the website to recall that you previously visited that website and may take certain steps to improve your experience (It may for example recall your selected language)

The cookies on our website cannot share information with a third person and these are necessary cookies that will help us to access our website and utilize from the functions of our website. The only exception is the analytical cookies. The information obtained within the framework of analytical cookies is bulk data (for example the fact that certain number of people visited a certain webpage). Therefore, these cookies do not contain any information regarding the individuals. We use Google Analytics to retain the relevant statistical data.

2.2.4.3. Blocking the Use of Cookies

To change your preference regarding the use of cookies, block or delete cookies all you have to do is changing the settings of your internet browser. This will prevent our website's recording cookie files by into your device or you can delete the previously-recorded cookies. However, your blocking or deleting the cookies may require you to reset your preferences (for example it may require you to change the selected language), and thus it may not be possible for you to utilize from certain properties of our website.

To turn off the cookies, you can find necessary information in the help pages of your internet browser. You can visit the following pages for frequently used browsers:

- Chrome: To enable or disable cookies
- Internet Explorer: To delete and manage cookies
- Mozilla Firefox: Turn on and off the cookies used by websites to monitor your preferences

2.3. Other Processing Activities and Sending e-Mails

In addition to the above-mentioned issues, some of your personal data will be processed depending on the circumstances. For example, first and last name, phone number and other personal data within e-mail content of the third persons that intend to contact us, that may be used in their correspondences with our company will be kept in our company's e-mail server in the course of the duration defined by our Personal Data Storage and Destruction Policy. Likewise, various applications, complaints, demands and requests conveyed to our company via mail or e-mail may also be processed by our company.

The goal of the processing activities falling under this scope is to contact the other side, fulfill the goal of the relevant correspondence, protect our rights, and conclude the processed applications, complaints,

demands and requests. As a rule, personal data covered within this context may be shared with the Alarko Group companies with a view to fulfilling the requirements and completing the related planning. However, based on the characteristics of the situation, such data may also be shared with third persons including our shareholders, consultants, and public institutes and agencies.

3. YOUR RIGHTS REGARDING YOUR PERSONAL DATA

You can submit an application to our company and make a request regarding the below-cited issues:

- Learning whether your personal data were processed, if these data were processed you can demand relevant information,
- Learning the purpose of the processing of your personal data and whether these data were appropriately used or not,
- Learning about the third persons to whom your personal data were transmitted domestically or internationally,
- Asking the correction of any incompletely or falsely processed personal data, and requesting the notification of this correction procedure to the third persons to whom your personal data were transferred,
- Requesting the deletion, destruction or anonymization of your personal data in case where the reasons requiring the processing of these data are no longer valid; and requesting the notification of this particular procedure to the third persons to whom your personal data were transferred,
- Raising an objection to any results obtained against you as a result of analyzing your processed data via exclusively automated systems,
- Demanding the indemnification of losses in cases where you incur losses due to the unlawful processing of your personal data.

You can use your rights regarding personal data through the below-mentioned methods, and convey your requests to our company.

Method	Address
Submitting the application to our company in written form (the applicant personally comes to our company address and submits his/her application with documents authenticating his/her identity or applicant notifying the application via notary public)	Muallim Naci Cad. No: 69/A, 34347 Ortaköy İstanbul
Sending the application to our registered e-mail address (REM)	alyat@hs01.kep.tr
Sending the application to our company by using your previously notified or registered e-mail address	contact@alarkovc.com
Sending the application to our company by using secure signature or mobile signature.	contact@alarkovc.com

You are kindly requested to write "This Application is Submitted within the Scope of Personal Data Protection Law" to the envelope or e-mail subject, in order to expedite the responding procedures to your application.