

**TEKFEN HOLDING CO., INC.**  
**GENERAL DISCLOSURE STATEMENT FOR PROCESSING PERSONAL DATA**

We, Tekfen Holding and Facility Management Co., Inc. (“Tekfen Holding” or “The Company”), would like to inform and disclose to you about our personal data processing activities under article 10 of the Law of Protection of Personal Data No. 6698 (“KVKK”).

**1. Data Manager and Representative**

Under KVKK, we, Tekfen Holding, shall, with the capacity of a data manager, be entitled to process, record, save, classify, update and disclose/convey to 3<sup>rd</sup> parties when allowed by the legislation and/or limited to the purpose of their processing your personal data for the below set forth purposes and in accordance with the law and integrity rules.

**2. Purpose of Processing Your Personal Data**

Your aforementioned personal data is, in accordance with the basic principles set forth in the KVKK, being processed and saved safely in physical or electronic environment for a period appropriate to the purpose of processing for purposes such as CONDUCTING OUR Company’s operational activity processes, business relations and human resources processes, meeting requests of concerned parties and continuity of technical processes, ensuring commercial security of the Company and conducting our operations. Tekfen Holding acts in compliance with the obligations set forth in the entire legislation, in particular the KVKK.

For detailed information on the purpose of processing your personal data by our Company, you can review the Tekfen Holding Personal Data Protection and Privacy Policy at the address [www.tekfen.com.tr](http://www.tekfen.com.tr)

**3. Conveyance of Your Personal Data**

Your personal data processed for the aforementioned purposes may be conveyed by Tekfen Holding to our business partners, shareholders, competent public bodies and organizations, private persons, firms we receive support services in order to perform our activities and independent auditing companies under statutory requirements and legal limitations in accordance with the basic principles set forth in the KVKK and under and for the personal data processing conditions and purposes as set forth in articles 8 and 9 of the KVKK with the limitation of the aforementioned purposes.

**4. Data Conveyance to Abroad**

Tekfen Holding may convey your personal data by obtaining your express consent pursuant to the principles set forth in article 4(2) of the KVKK or without obtaining express consent in existence of circumstances set forth in articles 5(2) and 6(3), and to persons and entities only residing in those countries after such foreign countries with adequate protection to be determined by the Personal Data Protection Board (“the Board”) under the rules included in article 9 of the

Law and for countries where it is determined and announced that there is no adequate protection, with the limitation of the circumstances where the data managers in Turkey and the concerned foreign country undertake an adequate protection in writing and the Board's permit can be obtained for the concerned conveyance.

## **5. Method and Legal Reason for Collecting Your Personal Data**

Your personal data is being collected by Tekfen Holding for the purpose of conducting our activities through different channels and based on the above stated legal reasons in order to improve the services we provide and conduct our business activities. Within this framework, your personal data can be processed and conveyed by obtaining your express consent pursuant to the principles set forth in article 4(2) of the KVKK or without obtaining express consent in existence of circumstances set forth in articles 5(2) and 6(3).

## **6. Your Rights as Concerned Person Under Article 11 of KVKK**

You, personal data owners, may communicate your claims for your rights to Kltr Mah Tekfen Sitesi Budak Sokak A Blok No:7 Ulus / Beşiktař 34340 Istanbul by completing and signing the form at the address [www.tekfen.com.tr](http://www.tekfen.com.tr) Tekfen Holding shall bring any claim to conclusion as soon as possible and within *thirty (30)* days at latest free of charge according to the nature of the claim. But, if such process requires a separate cost, we will charge the fee in the tariff determined by the Board.

Your rights under article 11 of KVKK are as follows:

- Learn whether or not personal data is being processed,
- If personal data is processed, request information on this,
- Learn the purpose of processing personal data and whether or not it is used for the proper purpose,
- Know the third parties to which personal data is conveyed at home or abroad,
- Request correction of personal data if it is processed incompletely or wrongly,
- Request deletion or destruction of personal data under the conditions set forth in article 7,
- Request communication of the procedures performed under paragraphs (d) and (e) to third parties to whom personal data is conveyed,
- Object to emergence of a consequence against the person him/herself as a result of analyzing the processed data exclusively through automated systems,
- Claim remedy of any damages in case of any damage due to unlawful processing of personal data.

\* This Disclosure Statement ("the Statement") is prepared on 30/11/2017. In case of any change in the text of this statement, the effective date and content of this Statement shall be updated.