
TURKISH MAARIF FOUNDATION PRIVACY POLICY

PREFACE

We, as TURKISH MAARIF FOUNDATION, attach utmost importance on the protection of your personal data and/or your special category of personal data within the scope of the Personal Data Protection Law. Furthermore, we act with utmost sensitivity in terms of the retention of all your personal data and/or your special category of personal data transmitted to our company through various channels. In this context; we, as TURKISH MAARIF FOUNDATION, would like to hereby confirm to have taken the necessary technical and administrative measures in order to comply with the provisions of the Constitution of the Republic of Turkey and other legislation, particularly the Law No: 6698 on the Protection of Personal Data. We would like to further commit to protect your other rights, which are guaranteed by the relevant legislation. In this context, you can confidently share your personal data with TURKISH MAARIF FOUNDATION and you may convey any suggestions, complaints and hesitations to us with peace of mind.

We hereby would like to share with you our Privacy Policy, which has been put into effect within the TURKISH MAARIF FOUNDATION and is particularly essential regarding the protection of your personal data.

TURKISH MAARIF FOUNDATION

1. DEFINITIONS

Data Controller	shall be TURKISH MAARIF FOUNDATION, which determines the purposes and means of processing personal data and is responsible for the establishment and management of the data filing system.
Data Subject (Natural Person Concerned)	means the natural person, whose personal data are processed.
Company	refers to TURKISH MAARIF FOUNDATION in accordance with this policy.
Law	refers to “Law No: 6698 on the Protection of Personal Data”.
Personal Data	refers to any information relating to an identified or identifiable natural person.
Special Category of Personal Data	Personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, membership to associations, foundations or trade-unions, data concerning health status, sexual life, criminal convictions and security measures and the biometric and genetic data are deemed to be special categories of personal data.
Board	Refers to the Personal Data Protection Board.
Policy	is referred to as the “Privacy Policy” included herein.
rocessing of Personal Data	“Processing of personal data” means any operation which is performed on personal data, wholly or partially by automated means or non-automated means which provided that form part of a data filing system, such as collection, recording, storage, protection, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization, preventing the use thereof.
Explicit Consent	means freely given, specific and informed consent.
Destruction	refers to the process of making personal data inaccessible, non-retrievable and re-useable by any person in any way.
Erasure	refers to the process of making personal data inaccessible, non-retrievable and re-useable for the relevant users in any way.

Anonymization	means rendering personal data impossible to link with an identified or identifiable natural person, even through matching them with other data.
Disposal	refers to the erasure, destruction or anonymization of personal data.
Data	refers to both personal data and special categories of personal data.

2. PURPOSE OF THE PRIVACY POLICY

The fundamental principle of this policy is the protection of personal data and compliance with the relevant law and legislation. Personal data requested and acquired within the context of the activities that we execute as TURKISH MAARIF FOUNDATION (hereinafter shall be referred to as “MAARIF FOUNDATION” or the “Company”) are kept confidential and are not disclosed to any other third party howsoever. In this context, our company has always acted with utmost sensitivity regarding the protection of personal data and/or special category of personal data. Furthermore, our in-house regulations have been restructured in accordance with the Law No. 6698 on the Protection of Personal Data (hereinafter shall be referred to as the “Law” or “PDP Law”) and all necessary technical and administrative measures have been taken. We, as MAARIF FOUNDATION, further agree, declare and undertake to comply with all the obligations stipulated by the law in the future.

3. SCOPE OF THE PRIVACY POLICY

This Privacy Policy has been prepared in accordance with the Law No. 6698 on the Protection of Personal Data.

Your personal data and/or special category of personal data are processed with your explicit consent and within the scope of the law. We use your relevant personal data for the following purposes:

- To ensure company security,
- To provide you with a complete service,
- To be able to carry out our commercial activities,
- To quickly produce solutions to your problems,
- To improve our quality.

Some personal data and/or special category of personal data acquired from you are de-personalized and anonymized in accordance with the procedures stipulated by the Law. Data used for statistical purposes are currently not included within the scope of the Law and our policy. We, as MAARIF FOUNDATION, reserve the right to amend this policy executed in order to protect your personal data, as long as it complies with the Law.

Through this privacy policy, MAARIF FOUNDATION aims to protect the data of its real and legal person solution partners, customers, employees and all other persons acquired by any means howsoever. In this context, it incorporates various regulations aiming to achieve the intended target.

4. BASIC PRINCIPLES OF PROCESSING PERSONAL DATA AND/OR SPECIAL CATEGORY OF PERSONAL DATA

Basic principles governing the processing of personal data and/or special categories of personal data are as follows: The following principles shall apply to the data processed by MAARIF FOUNDATION on the basis of explicit consent or in compliance with the relevant Law.

Legal Compliance of Personal Data : MAARIF FOUNDATION investigates the source and legal compliance of the personal data and/or special category of personal data transmitted via real and legal persons and acquired through various means. In this context, collecting personal data in accordance with the legislation is of utmost importance for MAARIF FOUNDATION.

Compliance of Personal Data with Integrity Rules : MAARIF FOUNDATION investigates the source of the personal data and/or special category of personal data transmitted via real and legal persons and acquired through various means. In this context, collecting personal data in compliance with integrity rules is of utmost importance for MAARIF FOUNDATION.

Being Relevant, Limited and Proportionate to the Purposes for which Personal Data are Processed: MAARIF FOUNDATION uses the personal data and/or special category of personal data acquired through various means relevant, limited and proportionate to the purpose of processing and to the extent required by the service performed.

Accuracy of Personal Data and/or Special Category Personal Data: MAARIF FOUNDATION attaches utmost importance to the accuracy and faultlessness of the personal data

and/or special category of personal data transmitted via real and legal persons and acquired through various means. However, MAARIF FOUNDATION is not obliged to investigate the accuracy of personal data and/or special category of personal data declared by its customers or real and legal persons with which it is in contact. For this is not possible in line with the legislation and our working principles.

Up-to-Date Qualification of Personal Data and/or Special Category Personal Data:

MAARIF FOUNDATION attaches utmost importance to the notification of any amendment to the personal data and/or special category of personal data acquired through various means and to update these data accordingly.

Processing of Personal Data in accordance with Specific and Legitimate Purposes:

MAARIF FOUNDATION processes personal data and/or special category of personal data without the explicit consent of the data owner or within the framework of exceptions stipulated by law. The purpose of processing each data is specific and no personal data is processed in accordance with any illegitimate purpose.

Retention of Personal Data for the Period Envisaged by the Law and/or Required by the Purpose of Processing:

MAARIF FOUNDATION retains personal data and/or special category of personal data for the period envisaged by the law and/or required by the purpose of processing. Personal data is anonymized, destructed or erased in the event that the reasons for the processing no longer exist.

5. ERASURE, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

Your personal data and/or special category of personal data is anonymized, destructed or erased upon the expiry of the statute of limitations and retention periods stipulated in the law, completion of the judicial processes and in the event that the reasons for the processing no longer exist. Personal data shall be erased, destructed or anonymized ex officio by MAARIF FOUNDATION or upon the request of the data owner concerned.

6. PRINCIPLE OF SCRIMPING

The principle of scrimping is also referred to in other words as the principle of maximum savings. Personal data and/or special category of personal data is transmitted to our corporate system through various channels. Pursuant to the said principle, personal data is processed into the system to the extent necessary.

The data to be collected by MAARIF FOUNDATION is determined specifically in accordance with the purpose for which data is processed. In this context, data are collected in accordance with a specific purpose and data that are not relevant to the purpose for which data is processed are not collected. Redundant data that are not relevant to the purpose for which data is processed are not retained in the corporate systems and are either erased, destructed or anonymized. However, these data can be used for statistical purposes.

7. PRIVACY AND SECURITY OF PERSONAL DATA

We, as TURKISH MAARIF FOUNDATION, attach utmost importance on the privacy of your personal data and/or your special category of personal data. In this context, our company has always acted with utmost sensitivity regarding the privacy of your personal data and/or special category of personal data collected by any means whatsoever. MAARIF FOUNDATION complies with the principle of the privacy of the said data at every stage of its commercial activities. In this regard, the company fully complies with this privacy policy.

MAARIF FOUNDATION takes all necessary technical and administrative measures to prevent personal data and/or special category of personal data collected through various means from being seized by unauthorized persons, to prevent harm to data owner's rights/aggravation of the data owner and to protect the data accordingly. Furthermore, third parties with whom we share personal data and/or special category of personal data from time to time in accordance with the legislation may also request the protection of data when necessary. Our software is updated and constantly renewed. In order to provide a high level of protection, all technological requirements are fulfilled and compliance with standards is ensured.

8. ACTUALITY OF PERSONAL DATA

MAARIF FOUNDATION attaches utmost importance on compliance with the principle of actuality. For personal data and/or special category of personal data collected through various ways may be updated when necessary or upon request. Necessary measures regarding the actuality of personal data are also taken by MAARIF FOUNDATION.

9. ACCURACY OF necessary, PERSONAL DATA

MAARIF FOUNDATION attaches utmost importance on compliance with the principle of the accuracy of the declared personal data and/or special category of personal data.

MAARIF FOUNDATION is not obliged to investigate the accuracy of personal data and/or special category of personal data declared by its customers or real and legal persons with which it is in contact. For this is not possible in line with the legislation and our working principles. In this context, transactions are carried out considering that the declared data are accurate.

10. PURPOSE OF PROCESSING PERSONAL DATA AND/OR SPECIAL CATEGORY OF PERSONAL DATA

Personal data and/or special category of personal data are processed in line with the purposes stipulated in the Clarification Texts of MAARIF FOUNDATION. Aforementioned Clarification Text may vary depending on the processed personal data and/or special category of personal data. Purposes for which personal data and/or special category of personal data are processed may vary depending on the wordings of the Clarification Texts.

11. PROCESSING OF PERSONAL DATA AND/OR SPECIAL CATEGORY OF PERSONAL DATA FOR ADVERTISING PURPOSES

The consent of the recipient is required for electronic messages sent for advertising purposes. In this context, e-mails for advertising purposes can exclusively be sent to people who have given prior consent. The subject in question is also clearly regulated in the "Law No. 6563 on the Regulation of Electronic Commerce" and the "Regulation on Commercial Communication and Electronic Commercial Messages".

For the purpose of electronic commercial messages sent for advertising purposes, MAARIF FOUNDATION acts in accordance with the above-mentioned legislation. Recipient permissions and approvals are also obtained in accordance with the legislation. Aforementioned permissions and approvals may be obtained through any electronic communication tool or in written. A legal permission and approval should basically contain the positive declaration of the recipient's consent to be sent commercial electronic messages, the electronic communication address and the name-surname of the recipient.

Permission and approval received from the recipient shall cover all commercial electronic messages sent to electronic communication addresses for marketing, promoting the goods and services offered by the Company, promoting its business and to ensure and improve its recognition through contents such as celebration, wishes and congratulations.

In addition, relevant persons are informed on the fact that their data may be processed and their explicit consent is obtained accordingly, when necessary, before any electronic commercial message is sent. This commercial message is also conveyed in accordance with the provisions of Law No. 6698 on the Protection of Personal Data.

12. COLLECTION AND PROCESSING OF PERSONAL DATA AND/OR SPECIAL CATEGORY OF PERSONAL DATA WITHIN A CONTRACTUAL RELATIONSHIP

In case a contractual relationship is established with customers or prospective customers, personal data collected pursuant to this contract may be processed by MAARIF FOUNDATION without receiving explicit consent. Special category of personal data will be processed on the grounds of explicit consent or legal reasons stipulated as per Article 6 of the Law. Data concerned is used within the framework of the performance of the goods and/or services, conclusion of the contract and the execution of commercial activities. This data may be updated at any time by contacting customers.

13. PERSONAL DATA AND/OR SPECIAL CATEGORY OF PERSONAL DATA PROCESSED THROUGH AUTOMATED SYSTEMS

Data compiled from information obtained through automated systems without the explicit consent of individuals cannot be used against individuals. MAARIF FOUNDATION processes personal data and/or special category of personal data through automated systems in accordance with the provisions of the relevant legislation.

14. PERSONAL DATA AND/OR SPECIAL CATEGORY OF PERSONAL DATA CONCERNING THE EMPLOYEES OF MAARIF FOUNDATION

DATA PROCESSING WITHIN THE FRAMEWORK OF LEGAL OBLIGATIONS: Personal data of employees may be processed without obtaining their explicit consent to the extent necessary in order to maintain an employment relationship with the company. MAARIF FOUNDATION undertakes to protect the confidentiality of employee data under all circumstances and to take the necessary measures in this regard.

PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH AN EMPLOYMENT CONTRACT AND RELATIONSHIP: Personal data of employees may be processed without obtaining their explicit consent to the extent necessary in order to maintain an employment relationship with the company. MAARIF FOUNDATION undertakes to protect the confidentiality of employee data under all circumstances and to take the necessary measures in this regard.

PROCESSING SPECIAL CATEGORY OF PERSONAL DATA OF THE EMPLOYEES: Pursuant to Law No. 6698 on the Protection of Personal Data, explicit consent of the Data Owners is required in addition to taking necessary measures prescribed by the Board for the purpose of processing special category of personal data. MAARIF FOUNDATION receives explicit consent of Data Owners in addition to taking necessary measures prescribed by the Board when processing special category of personal data within the framework of compliance with the provisions of Law No. 6698 and the principles of the Board. However, special category of personal data may be processed in exceptional cases stipulated in the Law, without obtaining the explicit consent of the person concerned, provided that such processing is limited to and in proportion to the purposes.

PERSONAL DATA PROCESSED THROUGH AUTOMATED SYSTEMS: Some personal data of employees may be processed through automated systems. These data are used for evaluating the performance of employees, keeping statistical data in addition to promotion and scoring purposes for the company. Employees reserve the right to raise an objection for adverse results arising in relation to them. The objection should be raised in accordance with internal company rules and procedures. The objection in question is also evaluated within the company.

PROCESSING PERSONAL DATA TO THE BENEFIT OF THE EMPLOYEES: Personal data of employees may be processed by MAARIF FOUNDATION without obtaining explicit consent of Data Owners within the framework of the employment relationship for transactions related to the interests of the employee. Personal data of employees may further be processed by MAARIF FOUNDATION within the framework of disputes regarding the employment relationship.

IN-HOUSE TELECOMMUNICATION, INTERNET AND COMMUNICATION: MAARIF FOUNDATION may allocate computers, telephones, cars, applications, software and e-mail accounts to its employees in order to facilitate the performance of its business. MAARIF FOUNDATION may control and inspect the personal data on the cars it has allocated. However, at this point, MAARIF FOUNDATION also fulfills the necessary Obligation to Inform.

The employee, on the other hand, will not be allowed to use the company vehicles allocated for personal purposes. Employees are obliged to use company vehicles only for the purpose of ensuring the performance of the business. At the beginning of the employment relationship with the MAARIF FOUNDATION, the employee shall further agree, declare and undertake not to incorporate any other data or information apart from those required by the job on the vehicles allocated.

15. DOMESTIC AND INTERNATIONAL TRANSFER OF PERSONAL DATA AND/OR SPECIAL CATEGORY OF PERSONAL DATA

MAARIF FOUNDATION may transfer data either domestically or internationally in accordance with the conditions stipulated in the Law on the Protection of Personal Data and within the framework of the principles determined by the Board, as long as it is in accordance with the law or provided that the explicit consent of the person concerned is obtained.

MAARIF FOUNDATION acts in accordance with Articles 8 and 9 of Law No. 6698 when transferring personal data and/or special category of personal data.

16. GOVERNANCE AND TRANSACTION SECURITY

MAARIF FOUNDATION takes all necessary technical and administrative measures to prevent personal data and/or special category of personal data collected through various means from being seized by unauthorized persons, to prevent harm to data owner's rights/aggravation of the data owner and to protect the data accordingly. Furthermore, third parties with whom we share personal data and/or special category of personal data from time to time in accordance with the legislation may also request the protection of data when necessary. Our software is constantly being updated, renewed and developed. In order to provide a high level of protection, all technological requirements are fulfilled and compliance with standards is ensured. In parallel with all these issues, MAARIF FOUNDATION carries out all internal and external audits necessary for the protection of personal data and/or special category of personal data.

17. NOTIFICATION OF DATA BREACH

In the event of any breach of data, MAARIF FOUNDATION immediately takes action to remedy the notified breaches. It takes the necessary measures to minimize the damage encountered by the person concerned. You may apply for the notification of any data breaches in accordance with the procedures specified on our company's website. Furthermore, in the event that personal data and/or special category of personal data are received by third parties without authorization, the company shall directly notify the Personal Data Protection Board.

18. RIGHTS OF THE DATA OWNER CONCERNED

The rights of the Data Owners are stipulated in Article 11 of the Law No. 6698 on the Protection of Personal Data. MAARIF FOUNDATION agrees that the person concerned should be informed and that explicit consent of the data owner should be obtained, pursuant to the

relevant law, before the data is processed; and that the data owner has the right to request clarification, amendment, erasure, destruction and anonymization of the data after the data is processed.

By means of a “Personal Data/Information Request Form in accordance with Law No. 6698 on the Protection of Personal Data” (LINK WILL BE PROVIDED); each person concerned reserves the right:

- a. to learn whether his/her personal data are processed or not,
- b. to demand information as to whether his/her personal data have been processed,
- c. to learn the purpose of the processing of his/her personal data and whether these personal data are used in compliance with the purpose,
- d. to know the third parties to whom his/her personal data are transferred in country or abroad,
- e. to request the rectification of the incomplete or inaccurate data, if any,
- f. to request the erasure, destruction or anonymization of his/her personal data under the conditions referred to in Article 7 of the Law titled “Erasure, Destruction or Anonymization of Personal Data”,
- g. to request notification of the operations such as correction of incomplete or incorrectly processed data or erasure or destruction of data in question upon the request of the person concerned to third parties to whom his/her personal data have been transferred,
- h. to object to the occurrence of a result against the person himself/herself by analyzing the data processed solely through automated systems,
- i. to claim compensation for the damage encountered due to the unlawful processing of his/her personal data.

Information request filed on behalf of someone else will not be answered by the company. MAARIF FOUNDATION reserves the right to file a lawsuit and claim compensation in the event it determines that a data request application has been filed on behalf of someone else. Data/Information requests of the person concerned will be replied as soon as possible and within thirty days at the latest as of the date MAARIF FOUNDATION is notified. MAARIF FOUNDATION may request additional/further information and documents from the applicant, when it deems necessary.

19. AMENDMENTS TO THE POLICY

Amendments to this Privacy Policy are listed and displayed in the table below.

Date of Amendment to the Policy	Amendments

TURKISH MAARIF FOUNDATION