



# Website Privacy Notice

IGDP\_N6 VERSION 1.00

## **Aladdin Middle East Limited – Turkey Branch Office**

### **Website Privacy Notice**

Aladdin Middle East Limited – Turkey Branch Office (hereinafter referred as the “Company”) is aware of its obligations under the Law No. 6698 on Personal Data Protection (KVKK, hereinafter referred as the “Law”) and is committed to processing your data securely and transparently. Company takes necessary administrative, technical and legal measures to ensure that your data is processed and retained according to law and transferred in a secure manner. This privacy notice sets out, in line with data protection law, the types of data that we hold on you as a visitor of our website. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

This Notice aims to inform you of how Company uses the personal data we collect from you when you (“Visitors”, “Data Subjects”) use our web site (<https://aladdinmiddleeast.com/>) , pursuant to the Law and Company’s Data Protection and Processing Policy. Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

You can enter and navigate the website without providing any personal information. Unless you visit the site with your username and password, it will remain anonymous and it will not be possible for us to identify you.

When you visit our web pages, our web servers always temporarily save for connection and set up and security purposes the connection data of the computer connecting to our site, a list of the web pages that you visit within our site, the date and duration of your visit, the IP address of your device, the identification data of the type of browser and operation system used as well as the website through which you linked to our site. Additional personal information such as your name, address, telephone number or e-mail address is not collected unless you provide this data voluntarily, e.g. while completing an online contact form, as part of a registration, survey, competition, fulfillment of contract or an information request. The legal basis for the processing of the aforementioned data categories is our legitimate interest to guarantee security and a smooth connection setup, to check the effectiveness of our services, to optimize them and tailor them to the needs of the users, as well as to correct errors and to carry out legally required duties such as our legal obligations emanating from Law No. 5651 on the Regulation of Internet Broadcasts and Prevention of Crimes Committed through Such Broadcasts, Law No 6698 on Protection of Personal Data and Network and Information Security Regulation in Electronic Communication Sector, Law No 6563 On The Regulation Of Electronic Commerce, Turkish Penal Code(Law no. 5237), Law No. 6698 on Personal data Protection and relevant regulations.

Our legal basis for processing your personal data are as follows: your express consent, which we may request from time to time, our legitimate interests, provided that it does not harm your fundamental rights and freedoms, provided that it is directly related to the execution of the contract we have established with you, carry out legally required duties prescribed in the

laws listed above and other legal obligations, the contractual relationship we have established with you.

We do not need your consent in order to carry out our legal obligations or exercise specific rights in law. However, we may ask for your consent to allow us to process certain data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn

Generally, we will rely on the first two reasons set out above to process your data. For example, we could collect your personal data in order to:

- ensure our administrative and IT systems are secure and robust against unauthorized access.
- in order to endeavor that the website is compatible and accessible by all authorized computers, mobile devices and internet browsers

In individual cases, our data processing takes place by using so-called hosting providers, which provide us with storage space and processing capacities in their computer centers and also process personal data on our behalf in accordance with our instructions. These service providers process data either exclusively in Turkey, or we have guaranteed a reasonable level of data protection with the assistance of the EU standard data protection clauses.

We transfer personal data to state authorities (including criminal prosecution authorities), should this be necessary to fulfil a legal obligation to which we are or should this be necessary in order to assert, exercise or defend legal claims.,

Where we share your data with third parties, such as service providers (e.g. hosting, web page design) and shareholders and business affiliates, we provide written instructions to them to ensure that your data are held securely and in line with legal requirements. Third parties must implement appropriate technical and organizational measures to ensure the security of your data.

### **Data Security and Confidentiality**

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such. Please refer to our Data Protection and Processing, Data Breach Response Plan and Data management and Retention Policies for more details.

In order to ensure the appropriate level of security, Company implements necessary technical and administrative measures in accordance with Article 12 of the Law:

- To prevent unlawful processing of personal data,
- To prevent unlawful access to personal data,
- To ensure the protection of personal data.

For instance, your data is saved in a secure operating environment which is not accessible to the public. In certain cases, your personal data is encrypted by Secure Socket Layer

technology (SSL) during transmission. This means that an approved encryption procedure is used for communication between your computer and Company servers if your browser supports SSL.

Although AME Turkey takes the necessary information security measures, in the event that personal data is breached as a result of attacks on our web site and the system, the Company immediately notifies relevant data subjects and the Personal Data Protection Board and takes further measures.

### **Your rights in relation to your data**

The Article 11 of the Law on data protection gives you certain rights in relation to the data we hold on you. These are:

a) the right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice;

b) the right of access. You have the right to access the data that we hold on you. To do so, you should make a subject access request. You can read more about this in our Code of Practice for Subject Access Request which is available on our website as outlined above or paper copies can be obtained by mail to our correspondence address mentioned above for the attention of Data Protection Liaison Officer whose contact details are shown at the end of this privacy notice.

c) the right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it;

d) the right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it;

e) the right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct;

f) the right to portability. You may transfer the data that we hold on you for your own purposes;

g) the right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests;

h) the right to regulate any automated decision-making and profiling of personal data. You have a right not to be subject to automated decision-making in way that adversely affects your legal rights.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

i) right to make a complaint

Finally, you can lodge a complaint with the supervisory authority responsible (KVKK) for compliance with personal data protection obligations. If your application is declined, the response is found unsatisfactory or the response is not given in due time, the data subject may file a complaint with the supervisory authority within thirty days starting from the notification of the response of the data controller, or within sixty days as of the application date, in any case. Please visit the following web site in order to obtain more information on how you can use your right to make a complaint: <https://www.kvkk.gov.tr/Icerik/2063/Sikayet-Hakki>

Web Site: [www.kvkk.gov.tr](http://www.kvkk.gov.tr)

Telephone Number: +90 0312 216 50 00

Address: Kişisel Verileri Koruma Kurumu

Nasuh Akar Mahallesi 1407. Sok. No:4, 06520 Çankaya/Ankara

Call Center: 198(From Turkey Only) personal Protection Information Center

As per Article 13 of the Law, subject access requests must be made in writing and can be made in either hard copy format or electronically.

Within this framework, the applications to be made to the Company in "written" form can be done by printing out and signing this form. You must include specific details of the data you wish to see in your request as this will enable a more efficient response from the Company. We may need to contact you for further details on your request if insufficient information is contained in the original request. Requests may be made by you personally, through a notary public or by a third party e.g. a solicitor acting on your behalf. We reserve our right to request evidence that the third party is entitled to act on your behalf if this is not provided at the same time as the request is made. You can also use your e-mail address that you previously notified to our Company and registered in our system. You can electronically sign this form with a "secure electronic signature" as defined in the Electronic Signature Law No. 5070 and send it to the registered e-mail address of the Company: [kvkk@ame.com.tr](mailto:kvkk@ame.com.tr)

If you have any questions or comments regarding this Cookies policy, please email [kvkk@ame.com.tr](mailto:kvkk@ame.com.tr) or use the subject access request form to make your request or send it to the following address: Karum İş Merkezi, İnan Cad.No:21/394 Kavaklıdere - Ankara, Türkiye

### **Changes to Privacy Notice**

AME Turkey reserves the right to change its Privacy Notice at any time with or without prior notice. Please check back frequently to be informed of any changes. By using our website, you agree to this Privacy Notice.