

**NGN BİLGİ VE İLETİŞİM HİZMETLERİ
TİCARET ANONİM ŞİRKETİ**

**POLICY OF PROTECTION AND PROCESSING
OF PERSONAL DATA**

Table of Contents

1. INTRODUCTION	3
1.1. INTRODUCTION	3
1.2. PURPOSE OF THE POLICY ON STORAGE AND DISPOSAL OF PERSONAL DATA	4
1.3. SCOPE OF POLICY AND MAKING AMENDMENTS IN THE POLICY	4
1.4. IMPLEMENTATION OF POLICY AND RELEVANT LEGISLATION	4
2. ISSUES ABOUT PROCESSING OF PERSONAL DATA	8
2.1. PROCESSING PERSONAL DATA IN ACCORDANCE WITH THE PRINCIPLES STIPULATED IN THE LEGISLATION	9
2.2. PROCESSING PERSONAL DATA BASED ON AND LIMITED TO ONE OR MORE OF CONDITIONS FOR PROCESSING THE PERSONAL DATA AS STIPULATED IN ARTICLE 5 OF KVKK	10
2.3. PROCESSING SPECIALLY QUALIFIED PERSONAL DATA	11
2.4. TRANSFER OF PERSONAL DATA	12
2.5. PERSONAL DATA PROCESSING ACTIVITIES WITHIN BUILDINGS, BUILDING ENTRANCES AND BUILDING FACILITIES AND VISITORS OF THE WEBSITE	12
2.6. CONDITIONS FOR DELETING, DISPOSING AND ANONYMIZING PERSONAL DATA	13
3. MATTERS RELATED TO THE PROTECTION OF PERSONAL DATA	5
3.1. ENSURING THE SECURITY OF PERSONAL DATA	5
3.2. PROTECTION OF THE RIGHTS OF DATA OWNERS; ESTABLISHMENT OF CHANNELS FOR DATA OWNERS TO ASK FOR USE OF THEIR RIGHTS AND ASSESSMENT OF THE REQUESTS OF DATA OWNERS	6
3.3. PROTECTION OF SPECIALLY QUALIFIED PERSONAL DATA	7
3.4. BRIEFING AND INFORMING PERSONAL DATA OWNERS	8
4. OTHER ISSUES	14
4.1. RELATIONSHIP OF THE POLICY OF THE COMPANY ON PROTECTION AND PROCESSING OF PERSONAL DATA WITH OTHER POLICIES	14
4.2. GOVERNANCE STRUCTURE OF THE POLICY OF THE COMPANY ON PROTECTION AND PROCESSING OF PERSONAL DATA	15
ANNEX-1 DEFINITIONS	16
ANNEX -2 ABBREVIATIONS	16

I. INTRODUCTION

1.1. INTRODUCTION

Protection of personal data is among our Company's top priorities. Protecting and processing the personal data of our customers, our potential customers, our employee candidates, company's shareholders, company's officers, visitors and the employees, shareholders and officers of our business partners and third parties that are managed by this Policy, constitutes the most important part of this subject. The activities carried out by our Company for the protection of personal data of our employees are managed under the NGN's Policy on Protection and Processing of Personal Data of Employees as prepared in line with the principles of this Policy.

According to the Constitution of Turkish Republic, everyone has right to ask for the protection of his/her personal data. As regards to the protection of personal data, which is a Constitutional right, NGN exercises due care for the protection of its customers, potential customers, employees, employee candidates, company's shareholders, company's officers, visitors and the employees, shareholders and officers of our business partners and third parties that are managed by this policy.

Accordingly, the necessary administrative and technical measures are taken by NGN for the protection of personal data processed in accordance with the relevant legislation.

This Policy shall provide detailed explanations with regard to the basic principles adopted by NGN in the processing of personal data as listed below:

- Processing personal data in accordance with Turkish legislation and good faith principle,
- Keeping personal data accurate and, up-to-date when necessary,
- Processing personal data for specific, clear and legal purposes,
- Processing personal data as relevant, limited and measured with the purpose which they are processed for,
- Keeping personal data for the time period which is stipulated under the relevant legislation or is required for the purpose of processing such data,
- Briefing and informing the owners of personal data,
- Establishing the necessary system for the owners of personal data to exercise their rights,
- Taking necessary precautions for the protection of personal data,
- Acting in accordance with the relevant legislation and regulations of the KVK (Protection of Personal Data) Board in transferring personal data to third parties in line with the requirements of the purpose of processing,
- Acting responsibly for processing and protecting the specially qualified personal data.

1.2. PURPOSE OF THE POLICY ON STORAGE AND DISPOSAL OF PERSONAL DATA

The main purpose of this Policy is to provide explanations about the processing of personal data by NGN in accordance with the laws and the systems adopted for the protection of personal data; and to provide transparency by informing the people, whose personal data is processed by our Company, particularly our customers, potential customers, employees, employee candidates, company's shareholders, company's officers, visitors and the employees, shareholders and officers of our business partners and third parties in this regard.

1.3. SCOPE OF POLICY AND MAKING AMENDMENTS IN THE POLICY

This Policy is related to all personal data of our customers, potential customers, employees, employee candidates, company's shareholders, company's officers, visitors and the employees, shareholders and officers of our business partners and third parties, as processed by automatic or non-automatic means that are part of any data recording system.

This Policy may fully apply to all personal data owners described in the above categories (for example our Active customers that are also our Visitors), or it may partly apply along with only certain provisions (for example only our Visitors).

1.4. IMPLEMENTATION OF POLICY AND RELEVANT LEGISLATION

Relevant statutory regulations that are in force in relation with the processing and protection of personal data shall be implemented primarily. In case of any inconsistency between the applicable legislation and the Policy, the applicable legislation shall prevail.

The Policy was prepared by arranging and aligning the rules stipulated in the relevant legislation with the applications of NGN. Our Company implements the necessary systems and makes preparations to ensure compliance with the period of validity prescribed in KVKK (Law on Protection of Personal Data).

II. ISSUES ABOUT PROCESSING OF PERSONAL DATA

In accordance with Article 20 of the Constitution and Article 4 of the KVKK, our Company processes personal data accurately and up-to-date when necessary; for specific, clear and legal purposes; as relevant, limited and measured with the purpose which they are processed for. Our Company keeps personal data for the time period which is stipulated under the relevant legislation or is required for the purpose of processing such data.

In accordance with Article 20 of the Constitution and Article 5 of KVKK, our Company processes personal data based on one or more of the conditions specified in Article 5 of KVKK in relation with processing of personal data.

Our Company acts in line with the regulations prescribed for processing specially qualified personal data in accordance with Article 6 of KVKK.

In accordance with Articles 8 and 9 of KVKK, our Company acts in line with the provisions prescribed in the law and established by KVK (Protection of Personal Data) Board in transferring personal data to third parties.

2.1. PROCESSING PERSONAL DATA IN ACCORDANCE WITH THE PRINCIPLES STIPULATED IN THE LEGISLATION

2.1.1. Processing Personal Data in Accordance with Laws and Good Faith Principle

Our Company acts in accordance with the principles established by statutory regulations as well as general rule of trust and good faith in processing of personal data. Accordingly, our Company takes proportionality requirements into consideration for processing personal data, and does not use personal data other than for the intended purposes.

2.1.2. Ensuring the Personal Data to Be Accurate and Updated, When Necessary

Our Company ensures that the personal data processed by it is accurate and up-to-date by taking the fundamental rights and legitimate interests of data owners into consideration. It takes the necessary precautions in this regard.

2.1.3. Processing the Personal Data for Specific, Clear and Legal Purposes

Our Company clearly and precisely describes its purpose of processing personal data that is valid and legal. Our Company processes the personal data to the extent that it is necessary for and that is associated with the services provided by it. The purpose of processing personal data is determined prior to the commencement of processing such personal data.

2.1.4. Processing the Personal Data as Relevant, Limited and Measured with the Purpose They are Processed for

Our Company processes the personal data in a way that is suitable to achieve the purposes indicated, and avoids processing the personal data that is not relevant or not required to achieve the intended purposes. For example, our Company does not process the personal data not required to meet possible future needs.

2.1.5. Keeping Personal Data For The Time Period Which Is Stipulated Under The Relevant Legislation or is Required for the Purpose of Processing Such Data

Our Company keeps personal data for the time period which is stipulated under the relevant legislation or is required for the purpose of processing such data. Accordingly, our Company firstly determines whether a certain period of time is stipulated in the relevant legislation in relation with the storage of personal data, and if a period is stipulated, it

complies with such time period; and if no period is stipulated, it keeps the personal data for the time period that is required for the purpose of processing such data. In case of the expiry of the period or disappearance of the reasons which require it to be processed, the personal data will be deleted, destroyed or anonymized by our Company.

2.2. PROCESSING PERSONAL DATA BASED ON AND LIMITED TO ONE OR MORE OF CONDITIONS FOR PROCESSING THE PERSONAL DATA AS STIPULATED IN ARTICLE 5 OF KVKK

Protection of personal data is a constitutional right. Fundamental rights and freedoms may only be restricted by law, without prejudice to their essentials, depending on the reasons set forth in the relevant articles of the Constitution. Pursuant to the third paragraph of Article 20 of the Constitution, personal data may only be processed in the cases stipulated in the law or by the explicit consent of the relevant person. Accordingly, our Company processes personal data only in cases prescribed in the law or by the explicit consent of the relevant person in compliance with the Constitution.

Explicit consent of the personal data owner is only one of the legal grounds that make it possible for processing personal data in accordance with the law. Other than explicit consent, personal data may be processed in case of occurrence of any of the following conditions below. Personal data can be processed based on one of the conditions specified below or multiple conditions may constitute a reason to process the same personal data. If it is specially qualified personal data, the following conditions will apply.

Although the legal basis for our Company to process personal data may vary, we act in accordance with the general principles set out in Article 4 of KVKK in processing personal data.

(i) Granting Explicit Consent by Personal Data Owner

One of the conditions to process personal data is explicit consent granted by data owner. Explicit consent of personal data owner must be provided by free will and on a specific issue after being informed properly.

To process personal data based on explicit consent of personal data owner, the explicit consents of customers, potential customers and visitors are collected through relevant methods.

(ii) Prescribed by Laws Explicitly

Personal data of data owner may be processed in accordance with the law, if it is explicitly prescribed by such law.

(iii) Failure to Collect Explicit Consent of the Person Due to Actual Impossibilities

Personal data of data owner may be processed, if it is compulsory to process such personal data to protect life and physical integrity of the relevant person or of another person, who is unable to provide his/her consent or whose consent may not be validated due to actual impossibilities.

(iv) Relevant for Concluding or Executing a Contract

Personal data may be processed if it is necessary to process the personal data of the contracting parties, provided that it is directly related with concluding or executing a contract.

(v) Compliance by Company with its Legal Obligations

Personal data of data owner may be processed if it is compulsory for our company to comply with its legal obligations in the capacity of data supervisor.

(vi) Personal Data Owner makes his/her Personal Data publicly available

If the personal data owner makes his/her personal data publicly available, then such personal data may be processed.

(vii) Processing of Personal Data is Compulsory to Establish, Use or Protect a Right

Personal data of data owner may be processed if it is compulsory to establish, use or protect a right.

(viii) Processing of Personal Data is Compulsory in terms of the Legal Interests of our Company

Personal data of data owner may be processed if it is compulsory to process such data in terms of the legal interests of our Company, provided that the fundamental rights and freedoms of data owner are not prejudiced.

2.3. PROCESSING SPECIALLY QUALIFIED PERSONAL DATA

Specially qualified data refers to data related to race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, dress, membership to associations, foundations or trade unions, health, sexual life, criminal conviction and security measures as well as biometric and genetic data. For processing personal data which is identified as "specially qualified" in KVKK, our Company acts responsibly in compliance with the provisions stipulated in KVKK.

In accordance with KVKK, our Company processes specially qualified data in the following cases, by taking sufficient measures to be determined by the Board of Protection of Personal Data:

- If personal data owner grants explicit consent, or
- If personal data owner does not grant explicit consent;
 - Specially qualified personal data other than those about the medical and sexual life of personal data owner, in the cases stipulated by law,
 - Personal data about the medical and sexual life of personal data owner is only processed by the individuals or authorized institutions and organizations which are bound by the obligation to keep such data as

confidential for the purposes of protection of public health, preventive medicine, medical diagnosis, provision of treatment and care services, planning medical services and financing of such services.

2.4. TRANSFER OF PERSONAL DATA

Our Company may transfer personal data and specially qualified personal data of the data owner to third parties (third party companies, group companies, third party natural persons) by taking necessary security measures in line with the legal personal data processing purposes. Accordingly, our Company complies with the provisions described in Article 8 of KVKK.

2.5. PERSONAL DATA PROCESSING ACTIVITIES WITHIN BUILDINGS, BUILDING ENTRANCES AND BUILDING FACILITIES AND VISITORS OF THE WEBSITE

To ensure security, our Company monitors the premises and facilities with security cameras, and processes personal data in terms of following up the entries and exits of our guests.

Personal data is processed by our Company through the use of security cameras and recording of entries and exits of our guests.

Accordingly, our Company acts in conformity with the Constitution, KVKK (Law on Protection of Personal Data) and other relevant legislation.

Images of our visitors are recorded by cameras and monitoring system within buildings, building entrances and facilities.

As part of monitoring our facilities by security cameras, our Company aims to increase the quality of the services provided, ensure the reliability of services, ensure the security of the company, customers and other people and protect the interests of the customers in the services that they receive.

Our Company executes such monitoring activities by cameras for security purposes in compliance with the provisions stipulated in KVKK.

The monitoring activities are carried out by our Company in accordance with the Law on Private Security Services and the relevant legislation.

Records made and stored in digital media are only accessible by a limited number of Company employees.

Necessary technical and administrative measures are taken by our Company to ensure the security of personal data obtained as a result of the monitoring activities in accordance with Article 12 of KVKK.

Apart from the above-mentioned camera recording activities, our Company is engaged in processing personal data to monitor the entries and exits of visitors in the premises and facilities of our Company, for the purpose of ensuring security and for the purposes described in this Policy.

2.6. CONDITIONS FOR DELETING, DISPOSING AND ANONYMIZING PERSONAL DATA

Personal data will be deleted, disposed or anonymized based on the decision of our Company or upon request of the personal data owner, in case the reasons that require such personal data to be processed disappear, although they have been processed in accordance with the provisions of the relevant law as described in Article 138 of the Turkish Criminal Code and Article 7 of KVKK.

Accordingly, our Company has developed necessary operational mechanisms and takes necessary technical and administrative internal measures to comply with such obligations, and provides training, assigns duties and increases the awareness of its relevant business departments to act in compliance with these obligations.

For ensuring security by our Company and for the purposes described in this Policy, our Company may provide internet access to our visitors during the period of their stay in our Buildings and Facilities. In this case, log records of internet accesses are kept according to the provisions of the Law No 5651 and the compulsory provisions of the legislation enforced based on such law. These records are processed only if it is required by authorized public institutions and organizations or to fulfill our legal obligations during audit processes that will be carried out internally.

Only a limited number of Company employees can access to such log records. The said Company Employees access to such records only for using them based on the requests of the authorized public institutions and organizations or for audit processes, and disclose the records only with legally-authorized entities. A limited number of individuals, who have access to the records, submit a declaration to confirm that they will maintain the confidentiality of the data that they obtain, through signing a confidentiality commitment.

Internet activities on the websites of our Company are recorded by means of technical tools (such as cookies) to ensure that people visit our websites in line with their visiting purposes, to provide them with customized contents and to engage in online advertising activities.

III. MATTERS RELATED TO THE PROTECTION OF PERSONAL DATA

In accordance with Article 12 of KVKK, our Company takes the necessary technical and administrative measures to provide the appropriate level of security for the purposes of preventing illegal processing of personal data, preventing illegal access to the data and ensuring maintenance of data.

3.1. ENSURING THE SECURITY OF PERSONAL DATA

Our Company takes the necessary legal, technical and administrative precautions in connection with data security and exercises the highest level of attention and care. The actions and measures taken by our Company to ensure "data security" in accordance with Article 12 of KVKK are described below.

- Our Company takes technical and administrative measures based on the technological means and cost of implementation to ensure that personal data is processed in accordance with the law. Employees are notified that they are not allowed to disclose the personal data that they obtain to third parties in violation of the purposes of KVKK and to use such personal data apart from the processing purposes and that this obligation will survive even after they leave from the Company, and the required commitments are taken from them accordingly.
- Our Company takes technical and administrative measures based on the nature of data to be protected, technological means and implementation cost for preventing careless or unauthorized disclosure, access, transfer or other illegal ways of access to personal data.
- Our Company increases the awareness of the organizations that process personal data such as its business partners and suppliers, to which it transfers personal data, to prevent illegal processing of personal data, prevent unauthorized access to data and ensure legal maintenance of personal data.
- The obligations that our Company must comply with while it processes personal data in the capacity of data supervisor and the obligation to comply with the legal, administrative and technical measures developed accordingly are contractually applicable to all organizations, which process personal data, and which cooperate with us in certain capacities such as suppliers, business partners, etc. in accordance with the nature of the activity that they carry out in relation with processing of personal data.
- Our Company takes technical and administrative measures based on the technological means and cost of implementation to store personal data in secure environments and to prevent personal data from being disposed, lost or amended for illegal purposes.
- Our Company performs inspections internally or have necessary inspections performed externally in accordance with Article 12 of KVKK.
- If the personal data that has been processed in accordance with the Article 12 of KVKK is obtained illegally by third parties, our Company implements a system to inform relevant personal data owners and the Board of Protection of Personal Data about this issue as soon as possible.

3.2. PROTECTION OF THE RIGHTS OF DATA OWNERS; ESTABLISHMENT OF CHANNELS FOR DATA OWNERS TO ASK FOR USE OF THEIR RIGHTS AND ASSESSMENT OF THE REQUESTS OF DATA OWNERS

Our Company implements the necessary channels, internal operations and administrative and technical regulations to assess the rights of personal data owners and to provide necessary information to them in accordance with Article 13 of KVKK.

If personal data owners submit their requests to use their rights listed below to our Company in writing, our Company will fulfill the request free of charge as soon as possible and within maximum thirty days according to the nature of the request. However, if such operation requires an additional cost, the fee indicated in the tariff determined by Board of Protection of Personal Data will be collected by our Company. Personal data owners are entitled;

- To know whether their personal data has been processed or not,
- If their personal data has been processed, to ask for information about processing of such data,
- To know the purpose of processing their personal data and to know whether such data is used in accordance with the purpose,
- To know the third parties inland or abroad, to whom such personal data has been disclosed,
- If their personal data has been processed incompletely or wrongly, to ask for correction of it, and to ask for providing information to third parties, to whom such personal data has been disclosed, in connection with such correction,
- To ask for deletion or disposal of their personal data, although their personal data has been processed in accordance with the provisions stipulated in the Law on Protection of Personal Data and the other relevant laws, but the reasons that require processing of their personal data have disappeared, and to ask for providing information to third parties, to whom such personal data has been disclosed, in connection with such deletion or disposal,
- To object to the occurrence of any negative results about data owner through analysis of their processed data exclusively by automatic systems,
- To ask for the indemnification of the loss suffered due to the processing of their personal data in violation of the law.

You must submit to our Company your request to use your above-mentioned rights in accordance with the paragraph 1 of Article 13 of KVKK in "writing" or by other methods as determined by the Board of Protection of Personal Data.

As the Board of Protection of Personal Data has not yet determined any method, you must submit your application to our Company in writing in accordance with the mandatory provisions of the Law. To use your above-mentioned rights, you must provide us your request together with the necessary information that verify your identify and the right that you want to use as stipulated in Article 11 of KVKK, and this will enable us to respond to your application about your request more quickly and effectively.

Accordingly, the channels and procedures that you can use to submit your written applications based on Article 13 of KVKK in connection with use of the rights granted in Article 11 of KVKK are described below.

You can complete the form available at the website of the Company in relation with your request including the explanations about the rights that you want to use as stipulated in Article 11 of KVKK, and deliver a signed copy of the form by hand to Büyükdere Cad.No:127, Astoria Kuleleri A Kule, Kat 1, Esentepe Şişli, 34394, Istanbul, Turkey, together with the documents that prove your identity or send the signed copy through a notary public or use other methods stated in KVKK or send the relevant form with secure electronic signature to the e-mail address info@ngn.com.tr.

3.3. PROTECTION OF SPECIALLY QUALIFIED PERSONAL DATA

In KVKK, particular attention is paid to the use of certain personal data due to the risk of possible damages or discrimination of people, in case such personal data is processed illegally.

Such data refers to the data about race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, dress, membership to associations, foundations or trade unions, health, sexual life, criminal conviction and security measures as well as biometric and genetic data.

With regard to personal data which is identified as "specially qualified" in KVKK and which is processed in compliance with the laws, our Company acts responsibly in protecting such data. Accordingly, the technical and administrative measures taken by our Company for the protection of personal data are carefully implemented in relation with specially qualified personal data, and all necessary inspections are carried out.

3.4. BRIEFING AND INFORMING PERSONAL DATA OWNERS

In accordance with Article 10 of KVKK, our Company informs personal data owners at the time of obtaining personal data. In this regard, our Company provides personal data owners with information at the time of obtaining personal data in connection with the identity of our Company, purposes of processing personal data, individuals to whom personal data can be disclosed and purposes of such disclosure, method of collection of personal data and legal reasons for collection as well as the rights of personal data owner under Article 11 of KVKK.

Article 20 of the Constitution stipulates that everyone is entitled to be informed in relation with his/her own personal data. Therefore, Article 11 of KVKK includes the right to "ask for information" as one of the rights of personal data owners. Our Company provides necessary information upon request of personal data owners according to Article 20 of the Constitution and Article 11 of KVKK.

In addition, our Company informs all personal data owners and relevant individuals that it processes personal data in accordance with all provisions of KVKK and “Law and Good Faith” principle by various public documents including this Policy, and ensures accountability and transparency in this way. Our Company also informs relevant individuals about its own activities and provisions in the law by using various methods particularly, when it obtains "explicit consent" from individuals.

IV. OTHER ISSUES

4.1. RELATIONSHIP OF THE POLICY OF THE COMPANY ON PROTECTION AND PROCESSING OF PERSONAL DATA WITH OTHER POLICIES

Based on the principles described by the Company in this Policy; the policies, procedures and implementation guidelines enforced for the implementation of the relevant principles are internally executed. The policies, procedures and implementation guidelines set forth for the protection of personal data are associated with the basic policies, procedures and implementation guidelines enforced by the Company in other fields, and compliance is also achieved between the processes of the Company managed with different policies but similar purposes.

4.2. GOVERNANCE STRUCTURE OF THE POLICY OF THE COMPANY ON PROTECTION AND PROCESSING OF PERSONAL DATA

A "Committee of Protection of Personal Data" was founded internally to manage this Policy and other policies, procedures and implementation guidelines related to this Policy in accordance with the decision of the Company’s top management. The duties of this committee are described below.

- To prepare the basic policies on Protection and Processing of Personal Data as well as any possible amendments to these policies, when necessary, and to submit them to top management for approval.
- To decide on the implementation of the Policies on Protection and Processing of Personal Data and method of conducting inspections and to submit the issues such as making internal appointments and ensuring coordination to top management for approval.
- To determine the necessary actions to be taken to ensure compliance with the Law on Protection of Personal Data and relevant legislation and to submit the necessary actions to top management for approval; to supervise and coordinate the implementation of such actions.
- To increase awareness within Company and with business partners of the Company in connection with Protection and Processing of Personal Data.

- To identify the risks that may arise in processing personal data by the company, to ensure that necessary measures are taken and to submit improvement suggestions to top management for approval.
- To design and conduct trainings in relation with the protection of personal data and implementation of policies.
- To finalize the applications of personal data owners at the highest level.
- To coordinate provision of information and training to personal data owners to ensure that they are informed about processing of personal data and their legal rights.
- To follow up the developments and regulations on Protection of Personal Data and to give advices to top management about the actions that could be taken internally in accordance with these developments and regulations.
- To coordinate the relationships with the Board and Organization of Protection of Personal Data.
- To perform other duties to be assigned by Company's top management in relation with the protection of personal data.

ANNEX-1 DEFINITIONS

Explicit Consent:	Refers to the consent, which is related to a specific subject, based on information and expressed by free will.
Anonymization:	Refers to the fact that personal data is modified in a way that will lose its status of personal data and that will not be recovered. For example: modifying the personal data to make it impossible to be associated with a natural person by techniques such as masking, consolidation, data corruption.
Employee Candidate:	Refers to the natural persons that made a job application to our Company or sent their CV's and relevant information for review by our Company
Employees, Shareholders and Authorized Officers of our Business Partners:	Refers to natural persons employed in organizations that are in business relationship with our Company (including but not limited to business partners, suppliers) as well as shareholders and authorized officers of these organizations.
Processing of Personal Data:	Refers to natural person whose personal data is processed. For example; Customers and employees.
Personal Data:	Refers to any information related to an identified or identifiable person. Therefore, the law does not cover processing of information about legal entities. For example, first name-last name, Turkish ID Number, e-mail, address, date of birth, credit card number, bank account number etc.
KVKK:	Refers to the Law no 6698 on Protection of Personal Data dated 24 March 2016 as published in Official Journal No 29677 on 7 April 2016.
Customer:	Refers to natural persons that use or used the products and services provided by our Company, irrespective of whether they have a contractual relationship with our Company.

Specially Qualified Personal Data:	Refers to the data related to race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, dress, membership to associations, foundations or trade unions, health, sexual life, criminal conviction and security measures as well as biometric and genetic data.
Potential Customer:	Refers to natural persons who requested to use or are interested in using our products and services or who are considered to be interested in our products and services in accordance with the commercial customs and good faith principle.
Company Shareholder:	Refers to natural person shareholders of our Company.
Authorized Officer of Company:	Refers to Board Members of our Company and other authorized natural persons.
Third Party:	Refers to third party natural persons that are associated with the above-mentioned individuals in order to ensure the security of business transactions between our Company and the above-mentioned parties or to protect their rights and provide them with benefits.
Data Processor:	Refers to the natural person and legal entity that processes personal data on behalf of the data supervisor, based on the authorization by such data supervisor.
Data Supervisor:	Refers to the person that determines the purposes and methods of processing personal data and that manages the location (data recording system) where data is kept systematically.
Visitor:	Refers to natural persons that entered the physical premises of our Company for various purposes or visited our websites.

ANNEX -2 ABBREVIATIONS

Law No 6698 or KVKK:	Refers to the Law no 6698 on Protection of Personal Data dated 24 March 2016 as published in Official Journal No 29677 on 7 April 2016.
EU:	European Union
Constitution:	Constitution No 2709 of Republic of Turkey dated 7 November 1982, as published in Official Journal No 17863 dated 9 November 1982.
KVK Board:	Board of Protection of Personal Data
KVK Organization:	Organization of Protection of Personal Data
Policy:	Policy of Protection and Processing of Personal Data of NGN Bilgi ve İletişim Hizmetleri Ticaret A.Ş.
Company or NGN:	NGN Bilgi ve İletişim Hizmetleri Ticaret A.Ş.
Turkish Code of Obligations:	Turkish Code of Obligations No 6098 dated 11 January 2011, as published in Official Journal No 27836 dated 4 February 2011.
Turkish Penal Code:	Turkish Penal Code No 5237 dated 26 September 2004, as published in Official Journal No 25611 dated 12 October 2004.

Turkish Commercial Code:

Turkish Commercial Code No 6102 dated 13 January 2011, as published in Official Journal No 27846 dated 14 February 2011.