

AÇIK



PRIVACY AND COOKIE POLICY

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1. PURPOSE

The purpose of the Privacy and Cookie Policy is to inform the relevant persons regarding the processing of personal data obtained during the use of cookies by customers/site users/members/visitors ("Relevant Person") during the operation of the website operated by us as TRB 360

2. SCOPE

The Privacy and Cookie Policy explains what types of cookies we use on our website for what purposes and how you can control these cookies.

3. DEFINITIONS

Table 1. Definitions

| Term | Definition |
|-----------------|---|
| Cookie | It is a small text file that is saved on your computer or mobile device via your browser when you visit a site. |
| Relevant Person | Refers to the natural person whose personal data is processed. |

4. ABBREVIATIONS

Table 2. Abbreviations

| Kısaltma | Explanation |
|----------|--|
| IEC | International Electrotechnical Commission |
| ISO | International Organization for Standardization |

5. REFERENCES AND RESOURCES

Table 3. References and Resources

| Reference/Resource Name | Reference/Resource Number | Version Date |
|-------------------------|--|--------------|
| 6698 | Personal Data Protection Law | 07.04.2016 |
| - | Regulation on Deletion, Destruction, or Anonymization of Personal Data | 28.11.2017 |
| - | Communiqué on the Procedures and Principles to be Followed in Fulfillment of the Disclosure Obligation | 10.03.2018 |
| - | Communiqué on the Procedures and Principles of Application to the Data Controller | 10.03.2018 |
| ISO/IEC 27001:2013 | Information Security Management System | May 2017 |

6. WEBSITE PRIVACY COOKIE POLICY

Your personal data; It is one of the leading principles of TRB 360 to protect the privacy of visitors to the www.trb360.com website operated by the data controller TRB 360

With the Website Privacy Policy, explanations are made about the processing of personal data of data subjects, the cookie policy, and the enforcement of the website privacy policy.

6.1. Processing of Personal Data of Data Subjects

Personal data obtained during your visit to our website may be processed by TRB 360 in accordance with Articles 5 and 6 of the Personal Data Protection Law No. 6698:

- ✓ Carrying out the necessary work by our relevant business units for the realization of the activities carried out by TRB 360 and carrying out the related business processes,
- ✓ Carrying out the necessary work by our business units to ensure that the relevant persons benefit from the services offered by TRB 360 and carrying out the relevant business processes. Planning and execution of TRB 360's Human Values policies and processes,
- ✓ Planning and execution of activities necessary for the presentation, recommendation, and promotion of TRB 360's services and products to relevant persons

6.2. Parties to whom Your Personal Data is Transferred and Purpose of Transfer

Your personal data obtained as a result of your visit to our website may be transferred to our business partners, suppliers, and legally authorized public institutions in line with the purposes of processing your personal data, within the personal data processing conditions and purposes specified in Articles 8 and 9 of the Law on the Protection of Personal Data.

6.3. Method and Legal Reason for Collecting Your Personal Data

Any information that makes your identity specific or identifiable is "personal data". Within the scope of your visit to our website, your personal data is collected through cookies, which are technical communication files, due to your visit to our website in accordance with the data processing conditions specified in the Law.

6.4. Rights of Data Subjects

As a personal data subject, we inform you that you have the following rights pursuant to Article 11 of the Law:

- ✓ To learn whether your personal data is being processed,
- ✓ Requesting information if your personal data has been processed,
- ✓ To learn the purpose of processing your personal data and whether they are used in accordance with their purpose,
- ✓ To know the third parties in Turkey and abroad to whom your personal data are transferred,
- ✓ To request correction of your personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom your personal data has been transferred,
- ✓ Although it has been processed in accordance with the Law and other relevant provisions of the law, to request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear

and to request notification of the transaction made within this scope to third parties to whom your personal data has been transferred,

- ✓ To object if a result arises against you by analyzing the processed data exclusively through automated systems,
- ✓ To request compensation for damages in case you suffer damage due to unlawful processing of your personal data

You can submit your applications for your rights listed above to TRB 360 by filling out the Personal Data Subject Application Form, which you can access from www.trb360.com. Depending on the nature of your request, your applications will be finalized free of charge as soon as possible and within thirty days at the latest. However, if the transaction requires an additional cost, you may be charged a fee according to the tariff to be determined by the Personal Data Protection Board.

6.5. Measures Taken to Ensure the Security of Personal Data of Data Subjects

In line with the importance given by TRB 360 to the protection of personal data and ensuring data security, in accordance with Article 12 of the Law, in order to ensure data security by TRB 360,

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

takes all necessary technical and administrative measures to ensure the appropriate level of security.

6.6. Cookie Policy

We use cookies so that you can make the most efficient use of our website and improve your user experience. If you do not prefer the use of cookies, you can delete or block cookies in your browser settings. We will assume that you accept the use of cookies on this site unless you change your cookie settings in your browser.

Explicit consent is required for functional cookies used for personalization and remembering preferences used in the website or applications.

6.7. What is a Cookie and Why is it Used?

Cookies are small text files that are stored on your device or network server via browsers by the websites you visit.

The main purposes of using cookies on our website are listed below:

- ✓ To improve the services offered to you by increasing the functionality and performance of the website,
- ✓ To improve the website to offer new features through the website and personalize the features offered according to your preferences,
- ✓ To ensure the legal and commercial security of the website, you and TRB 360.

6.8. How are Cookies Collected?

Cookies can be stored on your device through your browser during your first visit to a website. When you visit the same website again with the same device, your browser checks whether there is a cookie stored on your device on behalf of the website. If there is a record, it transmits the data in the record to the website you are visiting. In this way, the website understands that you have visited the site before and determines the content to be transmitted to you

accordingly. This collected information is device-specific. It can be deleted by the user at any time and access to the information can be closed.

6.9. Types of Cookies and Purposes of Use

There are two types of cookies, Permanent Cookies, and Temporary Cookies, depending on their validity period. Temporary cookies are created when you visit the website and are only valid until you close your browser. Permanent cookies are created when you visit the website and remain until you delete them or they expire. Permanent cookies are used for processes such as providing a personalized experience compatible with your settings.

The types of cookies and their intended use are described below.

| Types of Cookies | Explanation |
|---|---|
| Functional Cookies | Such cookies are used to make our website more functional and personalized (to ensure that your preferences are remembered when you re-enter the site). These cookies are first-party and are kept on your device for 90 (ninety) days. (Temporary cookies). |
| Performance - Analytical Cookies | Cookies that allow statistical measurement in order to analyze the behavior of users on websites. These cookies are often used to improve the site, including the measurement of the impact of advertisements on the relevant persons. (Permanent cookies). |
| User Interface Personalization Cookies | These cookies are used to store the user's preferences for service on the websites and are not linked to permanent identifiers such as usernames. Typical examples of these cookies for personalization purposes are the language preference cookie used to remember a language option selected by the user on a multilingual website. (Temporary cookies). |

6.10. Enforcement of the Website Privacy Policy

The Privacy Policy is published on TRB 360's website (www.trb360.com) and made available to the relevant persons upon the request of the personal data subjects.

Detailed information on the processing of your personal data can be found in the Personal Data Protection and Processing Policy at www.trb360.com.