

**Data Responsible:** CottGroup® Companies (hereinafter referred to as “CottGroup®”, the details of the group companies will be provided herein below)

This Obligatory Informative and Consent Text is prepared in accordance with the Law No. 6698 on Protection of Personal Data (“KVKK”) and is aimed at performance by the Data Responsible of its obligation to provide information prescribed by the said Law and obtaining of direct consent of the Data Subject for the processing of normal, and if shared, private data. The Data Subject agrees and declares that it has been informed about the matters hereunder:

### Article-1 Definitions

For the purpose of the implementation of the Law on Protection of Personal Data, the following capitalized terms shall have the meanings assigned to them herein below:

1. **Direct Consent:** Freely given consent on a specific matter with being informed in regards;
2. **Anonymization:** Rendering Personal Data not linkable with an identified or identifiable real person in any way, even by way of matching with other data;
3. **Data Subject:** Real person whose personal data is processed;
4. **Personal Data:** Any information relating to an identified or identifiable real person;
5. **Processing of Personal Data:** Any such transaction performed on the data, such as obtaining, recording, storage, preservation, alteration, adaptation, disclosure, transfer, retrieval, making available, or classifying the personal data or blocking the usage of it, by fully or partly automatic means, or by non-automatic means provided that it is part of a data recording system;
6. **Board:** The Board of Protection of Personal Data;
7. **Authority:** The Authority of Protection of Personal Data;
8. **Data Processor:** Real or legal person who processes the personal data on behalf of and based on the authority granted by the data supervisor;
9. **Data recording system:** Any recording system in which personal data are processed by being structured according to specific criteria;
10. **Data responsible:** Real or legal person who determines the purposes and means of the processing of personal data, and who is responsible for establishment and management of the data recording system.
11. **Private personal data:** Data in relation to race, ethnic origin, political opinion, philosophic belief, religion, sect or other beliefs, appearance, membership to associations, foundations or unions, health, sexual life, criminal convictions and security measures, and

biometric and genetic data.

## **Article-2 Principles Regarding Processing of Personal Data**

### **2.1 As part CottGroup®'s activities;**

CottGroup®, in its capacity as the Data Responsible, will process your “Personal Data” as mentioned below, including your data which identifies your identity or personal data or renders them identifiable, your salary (when necessary) and private personal data, as per the Law No. 6698 on Protection of Personal Data (“KVKK”). “Processing of Your Personal Data” means any procedure which is performed on personal data, such as collection, recording, storage, preservation, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization of personal data or blocking its use.

We, as CottGroup®, place great importance on the security and protection of your personal data. We continue to serve you with the awareness that the privacy and security of your personal data is of utmost importance while our services.

**2.2** Protection of your right of data privacy and fundamental rights and freedoms is our main principle while using your private data for payroll, accounting, consultancy, software procurement, informing on legislation, labor force support, outsourced services and your all other provided services.

1. Personal Data might be processed for the purpose of the performance of Data Responsible's obligations arising from any agreement between the Parties or the related legislation provisions.

**2.3** Personal Data can be transferred by CottGroup® to various organizations and institutions, only when and to the extent necessary and limited for the performance of the obligations arising from any agreement between the Parties and the related legislative provisions, and for increasing the service quality and protecting the legitimate rights of both Parties, by taking into account the decisions of the Authority,

1. and when required by the Labor Law, Obligation Law, Income Tax and all other legal and legislative means regarding your services. Such institutions and organisations may include:

2. Competent authorities and/or
3. Turkish or foreign employers to which the Data Subject has filed an application and/or
4. Administrative authorities and institutions including Tax Offices, workplace inspectors, Turkish Employment Agency (İşKur), Regional Directorate of Labour and Social Security Institution,
5. Employees authorized by the Data Responsible and/or
6. Independent auditors with whom the Data Responsible cooperates and/or domestic or foreign third parties carrying out activities related to the purpose of performance and service providers who provide information by way of promotion and communication or customer satisfaction monitoring services.

### **Article-3 Other Rights of the Data Subject**

Data Subject has each of the following rights, independently from, and in addition to its right of monitoring and requesting information about the fulfilment of the fundamental principles summarized above:

1. Learning whether or not her/his Personal Data has been processed,
2. Requesting information as to processing, if her/his Personal Data has been processed,
3. Learning the purpose of processing of his/her Personal Data and whether such data is used in accordance with its purpose,
4. Knowing the third parties to whom his/her Personal Data has been transferred at home and abroad,
5. Requesting rectification in case his/her Personal Data is processed incompletely or inaccurately,
6. Requesting deletion or destruction of his/her Personal Data in a manner and within the restrictions and legal time periods as prescribed under the Law and the relevant legislation, in case the reasons requiring the processing of such Personal Data are no longer present,
7. Requesting notification of the request for deletion or rectification of his/her Personal Data to third parties to whom such Personal Data is transferred,
8. Objecting to occurrence of any result that is to her/his detriment by means of analysis of his/her processed Personal Data, exclusively through automated systems,
9. Requesting compensation for his/her damages in case he/she incurs damages due to processing of his/her Personal Data in breach of the Law.

Data Responsible to whom you can file an application as per the Law:

You can file your request to use any of your rights above as per the regulations of the Personal Data Protection Law (KVKK), to CottGroup® in writing or in any other method determined by the Board of Protection of Personal Data, as well as through the following means.

You can file your signed and written application, along with formal documents accepted as identification documentation, by delivery in person or by post to Astoria Towers Kempinski Residences No:127 B Kule Kat:8 34394 Şişli - İstanbul / Türkiye, or by calling +90 212 244 92 22 or sending an e-mail to [accounts@cottgroup.com](mailto:accounts@cottgroup.com).

CottGroup®'s general website: <http://www.cottgroup.com>

Cottgroup® Companies:

The informative announcement herein has been pursued on behalf of the below mentioned companies

Company	Address	Tax Office	Tax Number
<a href="http://www.boss.com.tr">www.boss.com.tr</a> Boss Yönetişim Hizmetleri A.Ş. Management Office	Astoria Towers Kempinski Residence Büyükdere Caddesi No:127 B Kule Kat:8 34394 Şişli - İstanbul / Türkiye	1860079127	5
<a href="http://www.istanbulcpa.com">www.istanbulcpa.com</a> İstanbul Uluslararası Denetim ve SMMM Ltd. Şti.	Astoria Towers Kempinski Residence Büyükdere Caddesi No:127 B Kule Kat:8 34394 Şişli - İstanbul / Türkiye	401014329	5
<a href="http://www.netkeysoftware.com">www.netkeysoftware.com</a> Netkey Bilişim Sistemleri San. Ve Tic. Ltd. Şti.	Astoria Towers Kempinski Residence Büyükdere Caddesi No:127 B Kule Kat:8 34394 Şişli - İstanbul / Türkiye	665014627	5

Pera Kariyer Çözümleri Danışmanlık Ltd. Şti.  
[www.perakariyer.com](http://www.perakariyer.com) Astoria Towers Kempinski Residence Büyükdere Caddesi No:135 B Kule Kat:10 Beşiktaş / İstanbul / Türkiye 34398

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[www.upandlearn.com](http://www.upandlearn.com) Demircikara Mahallesi 1419 Sokak B Blok Apt. No:1 B/7  
Muratpaşa / Antalya / Türkiye Kurumlar 8930275247 745547

EDI Global Danışmanlık Tercüme ve Çeviri Hiz. Ltd. Şti.  
[www.ediglobal.com.tr](http://www.ediglobal.com.tr) Astoria Towers Kempinski Residence Büyükdere Caddesi No:135 B Kule Kat:10 Beşiktaş / İstanbul / Türkiye 34398

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