

Thank you for visiting our Website and reading our privacy policy. We are highly aware of the importance on the privacy and security of your personal data and provide care in the upmost level with high emphasis.

### **Basics of our data security and privacy approach**

Our company and the affiliated CottGroup® companies within the network (COTT) are committed to ensure the security of your personal data within all the IT systems and IT infrastructures. For COTT, privacy and security subjects form the basis grounds of the relationship we build with our clients. COTT corporate network consists of a series of independent members which are the providers of various sections of this website and other websites in COTT member network. You can see our present member companies from here. Companies which will be subsequently integrated in the COTT members' network can also be accessed from the same link.

The personal data you will share when using this website can be also kept under the control of another company among the COTT member network companies. The aim of this is to ensure the control, supervision and security of the related data at the highest level. Each independent member is legally responsible for the data kept under its control and supervision.

The expression "our company" contained in the present text refers to the COTT member network company which keeps your personal data under its control and responsibility and which you desire to be in contact with by visiting this website.

COTT Privacy Policy and related statements covers all Personal Data processed by COTT member network and our company, including the Personal Data collected or transferred via this website and the other internet sites in COTT member network, our software, self-service applications, mobile applications or social media accounts and other online and/or offline channels.

### **Which data do we collect?**

Our company can collect your personal data, by various methods, within the framework of legal rules and in compliance with the intended purpose of processing.

According to the definitions of the Personal Data Protection Authority, Personal Data refers to all kinds of information related to a real person who is identified or identifiable. In order to speak of a personal data, the data must belong to a real person and this person shall be identified or identifiable (Personal data and personal information refer to the same definition and purpose).

Detailed explanation on Personal Data;

1. **Being related to a real person:** Personal data is related to a real person. Data related to legal persons are out of the scope of the definition of personal data. Therefore, information related to a legal person, such as the tradename or address of a company will not be considered as personal data (apart from cases where they can be associated with a real person).

2. **The person must be identified or identifiable:** Personal data covers all the information directly showing the identity of a person or, although not directly showing the identity of a person, rendering him identifiable as a result of being associated with a record.

3. **All kinds of information:** The expression "All kinds of information" is quite extensive and does not only cover information which merely puts forth the identity of an individual, such as the name, surname, date of birth and place of birth of a real person; all data which renders a person identifiable, directly or indirectly, such as telephone number, motor vehicle license plate, social security number, passport number, curriculum vitae, photo, video and audio records, fingerprints, IP address, e-mail address, hobbies, preferences, people interacted with, group membership, family information, health information are considered as personal data.

The personal data which we record by automatic or non-automatic means when you visit our company's website and which you will share with us via communication forms, e-mails and other electronic transactions will be used firstly to fulfil your demand and subsequently to offer you a better service. In general, the purpose of use is as follows:

- To get in contact with you
- To provide you access to the website or self-service access, by performing operations related to your online account including but not limited to the supply of a password and user code.
- To answer to your questions
- To inform you of any change in legal regulations and to provide you with other important information
- To ensure the management of our website

- To increase the quality of our service

If you do not wish your personal information to be obtained and collected by us, please avoid sharing any information that is related to personal data. Do not forget that unless personal information is not provided with us, we will not be able to contact you. Thus, some of your data can be collected by means of cookies when you visit this website [You can have further information on our cookie policy by this link](#)

### **Data shared voluntarily**

You will be deemed to have shared your data voluntarily in the below-listed cases and similar occasions.

- When you subscribe to a news and legislation bulletin managed by COTT.
- When you purchase a service and share the information we requested from you to complete the service.
- When you share content about us in the social media.
- When you share information such as identity information or business card during your visits to exhibitions, seminars and events.
- When you visit one of our locations and we require visitor information.
- When you get in contact with our company or send curriculum vitae (CV).

### **Can my personal data be shared with other COTT member network companies?**

Data is processed only by COTT personnel authorized to implement the services in the scope of the COTT member network management office and all kinds of privacy and security procedure, and the personnel indicated in the privacy and security authority matrix. For details and conditions of transfer of data, please click on the link ["Information on Privacy Policies and Processing and Transfer of Personal Data](#)

### **Log data, Cookies and Web Beacons**

As COTT, we are aware and understand your concerns about the use of websites open to general use.

### **What is a Cookie?**

Cookies are widgets of programs that can be present in your laptop, pc and mobile device, which collect various data. Cookies are generally text files.

With these programs, the following data can be collected.

- Internet Protocol (IP) address
- Domain name of the computer with which you connect to the website
- The date and time of your log-in and period you spend on the website.
- The link of the page from which you connected to our company's website or the address of another COTT member website
- Information on your computer, the brand of your browser, your operating system, your java support, flash version, screen resolution and your connection speed
- Information on pages of the computer connected to when sending a request from our company's website
- The amount in bytes of the data transferred on our company's website
- The content of tracer cookies
- CottGroup® websites use temporary session cookies in order to secure your online activities and increase the website performance.
- Fields such as Login time, User Name and User ID required for our software and self-service applications (APPLICATIONS)
- URL information for which the User sent their latest request in APPLICATIONS
- Language information of your browser

You can find further details in the section [Cookie Notice](#).

## Protection of children's online activities

We assist parents willing to supervise their children's online activities. We never request personal information from children deliberately. If we find out that the person whose personal information we collected is below 13 years of age, we can use this information only to notify the matter to the parents immediately. This rule applies for age 16, within the context of the European Union General Data Protection Regulation (GDPR).

## Your rights

COTT respects your rights concerning the using and sharing of your personal information. Please kindly note that you can request access to your personal data or for a correction to be made on this information and make preference among the promotion materials you receive or

choose to not receive any marketing and promotion content from COTT member network. If you are in Europe, remember that you may have supplementary rights within the scope of the GDPR (General Data Protection Regulation).

Special Data Protection Rights for residents in the European Union: If you are within the boundaries of the European Union, you can object to the processing of your personal data, request restriction of the processing of your personal information or request the mobility of your personal information. To transmit your objections, please [click](#) on this link.

Likewise, in case your personal information is collected upon your approval, you can withdraw your approval at any time. The withdrawal of your approval will not affect (1) the legitimacy of any transaction we realized before your withdrawal, or (2) the processing of your personal information within the framework of legal grounds.

Furthermore, if your personal information must be preserved according to preservation periods arising from local laws and due to the performance of an agreement, please note that we have the right to preserve the same for this period.

If you think that we use your personal information in a way which is not in compliance with this notice, or if you wish to receive more information on your rights, you can get in contact with the European Union data protection officer at the address: [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

### **International harmonization and transfer to abroad**

COTT can transfer personal data of Turkish citizens and persons living in the European Union to countries which are considered secure as per the announcement to be made by the Personal Data Protection Authority. If, in cases indicated in the Law No.6698 (conditions indicated in the 2. paragraph of article 5 and 3. paragraph of article 6 of the Law), there is no adequate protection in the country to which data will be transferred (countries considered as unsecure by the Authority), transfer can be realized in case the adequate protection is warranted in writing and the Authority provides its approval.

The provisions of the Law No: 6698 on the Protection of Personal Data will apply for data

transfers.

### **Designing of new processes in compliance with privacy rules**

When developing new systems, COTT takes the most appropriate technological and corporate measures for privacy and makes the required improvements for the processing of personal data in compliance with the intended purpose. (Privacy by design)

### **Communication**

In compliance with legal rules, COTT can communicate with you in order to inform you of changes in the legislation and relevant information, and for the purpose of advertisement and promotion of new services and products, and for sale and marketing purposes. If you do not want to receive these messages, you can stop the notifications by using the related communication channels.

### **Preservation and disposal**

[For details please read our preservation and disposal policy.](#)

In case you have any questions related to this Privacy Notice, please [click on this link.](#)

[\(\\*\) For communication purposes, you can have access to our group companies included in the CottGroup® Independent Member Companies' Network from this link.](#)