

## CLARIFICATION TEXT OF GLOKEY CALL CENTER REGARDING THE PROTECTION OF PERSONAL DATA

APG Investment Danışmanlık Anonim Şirketi (“Company”), as the data controller, will record, classify, store, update, and process the personal data of relevant individuals in accordance with the Personal Data Protection Law No. 6698 (“Law”) and the European Union General Data Protection Regulation (“GDPR”), with a primary focus on protecting the privacy of personal life. Where permitted by legislation and to the extent allowed, personal data may also be transferred to third parties.

This Clarification Text has been prepared in compliance with the applicable legislation, including but not limited to the Law and GDPR, as well as the regulations, communiqués, decisions, and guidelines issued by the Personal Data Protection Board (“Board”). In the event of any amendments to the Law / GDPR or other relevant legislation following the publication date of this Clarification Text, and if such amendments render this text inconsistent, the modified provisions and rules shall prevail. All communiqués, decisions, and guidelines published by the Board are closely monitored by us, ensuring that the rules stipulated in this Clarification Text remain up to date.

### 1. DEFINITIONS

In this Clarification Text;

- **General Data Protection Regulation (GDPR):** Refers to Regulation (EU) 2016/679 of the European Parliament and Council, published in the Official Journal of the European Union on May 4, 2016, and enforced on May 25, 2018,
- **Personal Data:** Refers to any information relating to an identified or identifiable natural person,
- **Processing of Personal Data:** Refers to any operation performed on personal data, whether fully or partially automated or processed by non-automated means, provided that it is part of a data recording system. This includes collection, recording, storage, retention, alteration, reorganization, disclosure, transfer, acquisition, making available, classification, or restriction of data,
- **Personal Data Protection Law (KVKK):** Refers to Law No. 6698 on the Protection of Personal Data, which was published in the Official Gazette on April 7, 2016, and entered into force,
- **Board:** Refers to the Personal Data Protection Board,
- **Data Controller:** Refers to a natural or legal person who determines the purposes and means of processing personal data and is responsible for establishing and managing the data recording system.

### 2. DATA SUBJECT/RELEVANT PERSON

The data subjects within the scope of this Clarification Text are natural persons whose personal data are processed in the course of communicating with the Company via its call center.

### **3. IDENTITY OF THE DATA CONTROLLER AND ITS REPRESENTATIVE**

In accordance with the Law, your personal data will be collected and processed by the data controller as outlined below. For any inquiries regarding the processing of your personal data, you may contact the Company's Contact Person via email at [info@glokey.co](mailto:info@glokey.co).

### **4. PURPOSES OF PROCESSING PERSONAL DATA, LEGAL GROUNDS, AND METHODS OF COLLECTION**

The Company may record, store, update, transfer to third parties, classify, and process your personal data in compliance with the conditions set forth under the relevant articles of the GDPR and the Law. The Company clearly defines the purposes for processing personal data and processes such data within the scope of its business activities and in connection with these purposes.

Your personal data collected through the channels and methods specified in this Clarification Text are processed by the Company for the following purposes and legal grounds:

<b>DATA PROCESSING ACTIVITY: EXECUTION OF CALL CENTER ACTIVITIES</b>
<p><b>Processed Personal Data</b></p> <p><b>Identity Data:</b> Full Name</p> <p><b>Contact Data:</b> Email Address, Phone Number</p> <p><b>Transaction Data:</b> Date, Time and Duration of the Call, Records of Requests, Questions, Complaints and Suggestions, and Data Transmitted to the Company During the Call</p> <p><b>Visual And Audio Data:</b> Audio Recordings Related To The Call</p>
<p><b>Purposes of Personal Data Processing</b></p> <p>Conducting Information And Communication Activities Related To The Services, Ensuring The Monitoring, Documentation, Resolution, And Response To Requests And Complaints, Carrying Out After-Sales Support Services, Managing Potential Client Relationship Processes, Using The Records As Evidence In Potential Future Disputes; Performing Data Retention And Archiving Activities, And Providing Information To Authorized Persons, Institutions, And Organizations</p>

### **Legal Grounds for Processing Personal Data**

Your personal data is processed by the Company for the purposes outlined above, based on the following legal grounds specified in the GDPR and Article 5 of the Law:

- Necessity for the performance or establishment of a contract, provided that the processing is directly related to the contractual obligations of the parties,
- Necessity for the legitimate interests of the data controller, provided that it does not infringe upon the fundamental rights of the data subject.

### **Methods of Collecting Personal Data**

The above-mentioned personal data are collected during communications conducted via the Company's call center line and through call and voice recording systems.

### **Transfer of Personal Data**

Your personal data, provided to us for the purposes outlined above, may be transferred to relevant authorities without the obligation of notification and without requiring your explicit consent, in accordance with Article 28 of the Law, if requested. Apart from this, in unforeseen circumstances, in the event that your personal data is explicitly required by law, it may be transferred to public institutions specified in the legislation (such as ministries, judicial authorities, law enforcement agencies, and other administrative bodies) within the scope and limitations prescribed by law.

Furthermore, audio recordings of the calls will be stored on the cloud system of the third-party service provider operating the call center. The phone number and audio data related to the call may be shared with this third-party provider in accordance with the conditions set forth under Article 8 of the Law on the Protection of Personal Data (KVKK) and the relevant provisions of the GDPR. Your personal data are not transferred abroad.

## **5. RETENTION AND DELETION PERIOD OF PERSONAL DATA**

Your personal data will be processed in accordance with the relevant legislation on data protection, including the European Union General Data Protection Regulation ("GDPR"), Law No. 6698 on the Protection of Personal Data, and Regulation No. 30224 on the Deletion, Destruction, or Anonymization of Personal Data, as well as decisions made by the Board, national and international agreements, and other mandatory legal provisions. In any case, your personal data will be processed as long as the purposes and reasons for processing outlined in this Clarification Text persist (For example, records related to contractual relationships must be kept for 10 years in accordance with the relevant provisions of the Turkish Code of Obligations No. 6098; traffic records must be kept for a maximum of 2 years in

accordance with the relevant provisions of Law No. 5651). Your personal data will be deleted once the purpose and legal grounds for processing cease to exist.

## **6. YOUR RIGHTS UNDER THE LAW AND GDPR**

As personal data owners, you may submit your requests regarding your rights by filling out the Data Subject Application Form published on the website [www.glokey.com.tr](http://www.glokey.com.tr) or by submitting it in writing with another document that includes the mandatory information as specified in the application form. Alternatively, you may also send it by using registered electronic mail (KEP), secure electronic signature, mobile signature, or the electronic mail address that the relevant person has previously provided to the Company and is recorded in the Company's system, in a way that allows your identity to be verified. The Company will respond to your request as soon as possible and no later than thirty days, free of charge, based on the nature of the request.

In this context, personal data owners have the following rights:

- To learn whether personal data is processed or not,
- If personal data has been processed, to request information about it,
- To learn the purpose of processing personal data and whether it is used in accordance with its purpose,
- To know the third parties to whom personal data has been transferred, whether within the country or abroad,
- To request the correction of personal data if it is inaccurate or incomplete, and to request that the correction be communicated to third parties to whom the personal data has been transferred,
- To request the deletion or destruction of personal data if the reasons for processing no longer exist, and to request that the process be communicated to third parties to whom the personal data has been transferred,
- To object to a result arising from the exclusively automated processing of personal data, which leads to negative consequences for the person,
- To request the compensation of damages in case of damage caused by the unlawful processing of personal data.

The Company ensures that the provisions of the applicable legislation will be implemented in case of any inconsistency between the changes in the legislation and this Clarification Text, and reserves the right to update the Clarification Text in accordance with any amendments in the applicable legislation or developments in personal data processing activities.

<b>Data Controller</b>	<b>APG Investment Danışmanlık Anonim Şirketi (Mersis Number: 0071095680400001)</b>
<b>Address</b>	<b>Kuruçeşme Mahallesi Öksüz Çocuk Sok. No: 6 Beşiktaş / İstanbul</b>
<b>Contact</b>	<b>info@glokey.co</b>