

CLARIFICATION TEXT ON PERSONAL DATA PROTECTION CODE

As **Milagro Dijital Pazarlama Danışmanlık Sanayi ve Ticaret Ltd. Şti.**, we care about protecting the fundamental rights and freedoms of individuals in the protection and processing of personal data, particularly the privacy of private life regulated under Article 20 of the Constitution and the Personal Data Protection Law No. 6698 ("**KVKK**"). Within this framework, we act in accordance with this understanding in all our planning and activities in order to be within the limits of the legislation in the protection and processing of personal data in a lawful manner.

Since there is a separate "Cookie Clarification Text" regarding the cookies used on our website; the clarification under this Clarification Text herein is related to the personal data apart from the "cookies".

1. DATA CONTROLLER

As **Milagro Dijital Pazarlama Danışmanlık Sanayi ve Ticaret Ltd. Şti. ("Company")**, established in Turkey, located in Beştepe Mah. Yaşam Cad. No: 7 İç Kapı No: 15 Yenimahalle Ankara, the taxpayer with the tax number 6211110141 in the Maltepe Tax Office, in the capacity of the data controller, we hereby inform you that your personal data shall be recorded, stored, preserved, reorganized, shared with the institutions authorized by law to request such personal data, transferred to domestic or foreign third parties, transferred, classified and processed in other ways listed in the KVKK, within the framework of the purpose that requires processing and connected with this purpose, in a limited and measured manner, by maintaining the accuracy and the most up-to-date version of the personal data as you have notified us or as notified to us.

2. FOR WHAT PURPOSE DO WE COLLECT YOUR PERSONAL DATA?

Depending on the feature of the services we provide as a company, we collect, record, store, preserve your personal data and share and transfer it to third parties to the extent permitted under the legislations, for the purposes set out below, in cases where and to the extent permitted by the legislation:

- ❖ To confirm your credentials,
- ❖ Signing of the membership agreement,
- ❖ Ensuring contact with you,
- ❖ Ensuring that you benefit from the services we offer you,
- ❖ Ensuring the delivery of promotions, notifications and announcements to be made to you,
- ❖ Remembering your personal preferences,
- ❖ Making payment transactions,
- ❖ To fulfill our obligations to provide information, documents and other related obligations to authorized public institutions and organizations and judicial authorities on duty,

In any case, your personal data may be processed within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the KVKK.

3. WHERE DO WE TRANSFER YOUR PERSONAL DATA?

Your personal data is not transferred to unrelated third parties. Additionally, due to and limited to our legal obligations, they may be transferred to courts and other public institutions; contracted third parties and other contracted organizations in order to provide the services we undertake; companies and individuals from whom we purchase services; within the framework of the personal data processing conditions and purposes specified in Article 8 of the KVKK regarding the transfer of personal data and Article 9 regarding the transfer of personal data abroad.

4. METHOD AND LEGAL REASON FOR COLLECTING YOUR PERSONAL DATA

Your personal data is processed by our Company through membership forms and partially by automated means. The legal reasons for the processing of your personal data are as follows:

- ❖ It is necessary to process personal data of the parties to the contract, provided that it is directly related to the conclusion or performance of a contract.
- ❖ It is mandatory for the data controller to fulfill its legal obligation.
- ❖ Data processing is mandatory for the establishment, exercise or protection of a right.
- ❖ Data processing being mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the relevant person.

5. RIGHTS OF THE PERSONAL DATA OWNER

The personal data owners, who are defined as "data subjects" in Article 11 of the KVKK, may be provided with information within the scope of the rights granted below in accordance with Article 11 of the KVKK, provided that they prove their identity:

- ❖ Learning whether personal data is being processed,
- ❖ Requesting information if personal data has been processed,
- ❖ Learning the purpose of processing personal data and whether they are used in accordance with their purpose,
- ❖ To know the third parties to whom personal data are transferred domestically or abroad,
- ❖ Requesting correction of personal data in case of incomplete or incorrect processing and requesting notification of the operation made within this scope to third parties to whom personal data is transferred,
- ❖ Requesting erasure or destruction of personal data in cases where the reasons for processing cease to exist, despite the fact that the relevant data was processed in line with KVKK and other applicable legislations, and requesting notification of the operation made within this scope to third parties to whom personal data is transferred,
- ❖ To object to the emergence of a result to the detriment of the person through the analysis of the processed data exclusively via automated systems
- ❖ Demanding compensation for the damage in case of damage due to unlawful processing of personal data.

As personal data owners, if you submit your requests regarding your rights to our Company by the methods specified in this Clarification Text, our Company shall resolve the request free of charge as soon as possible and within thirty days at the latest, depending on the feature of the request. However, in case a fee is stipulated by the Personal Data Protection Board or in case the transaction requires an additional cost, the fee in the tariff determined by the Personal Data Protection Board shall be charged by us.

In order to exercise your rights mentioned above, you may send your request containing your explanations regarding the right you demand to exercise among the rights specified in Article 11 of the KVKK with the necessary identifying information; to Beştepe Mah. Yaşam Cad. No: 7 Interior Door No: 15 Yenimahalle Ankara address with wet signature and along with the identifying information, via registered letter with return receipt requested or via notary public or other methods specified in KVKK or you can send the relevant form to info@creditovision.com e-mail with secure electronic signature.

In the application that you are entitled to, as the personal data owner, aimed at utilization of your above-mentioned rights and indicating your explanations regarding the right which you request to exercise; the matter you request must be clear and understandable, the subject you request must be related to your person or if you are acting on behalf of someone else, you must be specifically authorized in this regard and document your authority, it must also contain identity and address information and documents certifying your identity must be attached to the application.