

## **CLARIFICATION TEXT FOR PROTECTION OF PERSONAL DATA PURSUANT TO THE LAW ON THE PROTECTION OF PERSONAL DATA NUMBERED 6698**

We as the Data Controller target to inform you through this Clarification Text on your personal data given below and processed by Feilo Sylvania TR Elektrik Ürünleri Ticaret Limited Şirketi pursuant to Article 10 with heading "Clarification Obligation of Data Controller" of the Law on the Protection of Personal Data numbered 6698 ("The Law") promulgated in the Official Gazette dated 7th of April 2016 and numbered 29677 for purpose of protection of fundamental rights and freedoms of persons particularly the right of privacy and the Communique on the Procedures and Principles to Be Followed in Fulfillment of Obligation to Inform promulgated in the Official Gazette dated 10th of March 2018 and numbered 30356 in processing of personal data

Feilo Sylvania TR Elektrik Ürünleri Ticaret Limited Şirketi takes all the technical and administrative measures to provide the suitable security level for purpose to prevent any unlawful processing of, access to your personal data and to ensure to retain them.

### **1. PROCESSED PERSONAL DATA**

Personal Data means any and all information relating to an identified or identifiable natural person. Your processed personal data and their categories are given below.

Contact Numbers: Telephone number, contact address, e-mail address and residential address

Processing Security Details: IP details, Password and User Name

Financial Details: Credit card details and invoice details

Marketing Details: Cookies recording

Other Information: Subscription Status

### **2. PROCESSING PURPOSES OF PERSONAL DATA**

Your personal data may be processed for following purposes in accordance with the processing conditions provided for in Articles 5 and 6 of the Law and secondary regulations:

- Business development,
- Maintaining of advertisement activities,
- Carrying out analytical activities,
- Providing the service quality,
- Conducting detection and prevention of any malicious uses (virus, cyber-attack, forgery, fraud activities),
- Conducting retention and archive works,

### **3. TRANSFER OF PERSONAL DATA**

Your personal data may be transferred to the following 3rd persons in the scope of 6698 numbered personal data protection Law and the other legislation and for the stated purposes in the scope of the provisions of the Law regarding to transfer personal data abroad:

Feilo Sylvania Int.Group Kft.

- The regulatory and supervisory authorities and the state institutions and organizations where your personal data is subjected to and which have authority to request the same explicitly,

- The real and legal persons or private law legal persons whom we are authorized and who act on behalf of and for our Company,
- Business partnerships, supplier and contractor companies, payment and e-money agents, banks, credit risk and financial institutions, obliged persons concerning legal follow up procedures, the third persons consulting us including institutions and organizations and supervisors,
- May share non-comprehensively the transaction security details of the concerned person with our foreign suppliers for purpose to ensure the data security in our practice and to conduct the product supply processes, to enable checks for fraud and to carry on archive processes.

#### **4. COLLECTING PROCEDURES OF PERSONAL DATA AND ITS LEGAL REASONS**

Your personal data may be obtained and processed with automatic methods by means of our web sites at establishment of our legal relationship with the concerned persons and during the mentioned relationship.

- Law no. 6098 Turkish Obligation Law,
- Law No. 6102 Turkish Commercial Law,
- Law No. 6698 Personal Data Protection Law
- Processing of the personal data is compulsory for the legitimate benefits of the data controller provided that
  - your explicit consent is obtained,
  - That it is explicitly provided for in the laws,
  - That it complies with retaining, reporting, notification obligations provided for by the legislation and official authorities,
  - That there is a requirement for processing of the personal data of the parties to an agreement on condition that it is directly relevant to establishment and fulfillment of the agreement, to be able to supply the products and services demanded and to fulfill the requirements of the agreements we concluded,
  - That it is compulsory to perform the legal obligation,
  - That it has already been disclosed by the concerned person to the public,
  - without prejudice to the fundamental rights and freedoms of the concerned person.

#### **5. IF YOU WANT TO GET INTO CONTACT WITH US FOR YOUR RIGHTS AND CLAIMS**

You may file your requests in person directly with or send by post or through Notary Public to our addresses given below for the respective channel,

- To convey the same to our following addresses through using the texts communicable and retainable by registered e-mail (REM) address, secure e- signature or mobile signature,
  - with a petition issued in accordance with the conditions prescribed in the Communiqué on the Procedures and Principles for Application to the Data Controller (the Communiqué) to enable Turk Telekom to establish if the application is yours or not according to its nature and your application method pursuant to Article 11 of the Law regulating the rights of the concerned person and thus to protect your rights.
- The applications filed in this scope shall be accepted following to an identity authentication carried out by us and your request shall be concluded as soon as possible and the latest within 30 days according to the nature of the request. In case the application is replied in written, no charge shall be applied up to 10 pages and 1 Turkish Lira may be charged for each page over 10th page. In case reply to the application is provided by a recording medium such as CD, flash memory, a fee may be charged in the amount of the recording medium's price.

**OUR APPLICATION CHANNELS and ADDRESSES**

Feilo Sylvania TR Elektrik Ürünleri Ticaret Limited Şirketi

Address: Fatih Sultan Mehmet Mah. Balkan Cad. Buyaka 17F No: 56 Ümraniye/İstanbul

KEP: [feilosylvania@hs01.kep.tr](mailto:feilosylvania@hs01.kep.tr)

Mail: [turkey@sylvania-lighting.com](mailto:turkey@sylvania-lighting.com)

*[ ] I consent that my personal data may be transferred abroad under the purposes stated in the clarification text submitted to me as the service supplier locates abroad.*

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