

PRIVACY NOTICE

PURSUANT PERSONAL DATA PROTECTION LAW REGARDING COOKIES

1. INTRODUCTION

This Privacy Notice is prepared in accordance with Article 10 of the Personal Data Protection Law No. 6698 ("Law"), the Communiqué on the Procedures and Principles to be Followed in Fulfilling the Obligation to Inform ("Communiqué"), and the Guidelines on Cookie Practices ("Guidelines"), by VİTSAN MÜMESSİLLİK VE MÜŞAVİRLİK A.Ş. ("Company" or "Vitsan") in the capacity of data controller, in order to inform you, as the data subject, regarding the cookies that will be processed during your visit to www.vitsan.com.tr ("Website") in compliance with the Law, the Communiqué, the Guidelines and other applicable legislation. In addition, this Privacy Notice provides information regarding the purposes for which cookies are used on our Website, the types of cookies we use, and how you can control these cookies.

Through the cookies on the Website, your data is processed for the purposes of enabling you to use the Website in the most efficient manner and to improve your user experience.

2. GENERAL INFORMATION ABOUT COOKIES

2.1 What is a Cookie?

Cookies are small text files stored on your computer (or on other internet-enabled devices such as smartphones and tablets) or on the network server via browsers by the websites you visit. Cookies are created by the servers associated with the website you visit. Accordingly, when the device where the text files are stored visits the site again, the server recognizes it.

2.2 Types of Cookies and Their Purposes of Use

Cookies according to their purposes of use:

Necessary Cookies	These are cookies that are necessary for the functioning of the website and for its intended use. If necessary cookies are blocked, some parts of the Site will not function. These cookies allow you to use functions such as enhancing security, saving searches, logging in, or similar functions. They are not used for marketing purposes.
Functional Cookies	These cookies are used to remember personalization and preference recall purposes on websites or applications (including desktop, mobile, or IOT devices). They are used to provide functionalities other than that provided by necessary cookies. In cases where it is not obvious that the data subject has explicitly requested an information society service, explicit consent will be required.
Performance (Analytics) Cookies	These cookies allow statistical measurement to analyze the behavior of users on websites. They are frequently used for improving the site, including measuring the impact of advertisements on relevant persons. They are used by website owners to estimate the number of unique visitors, identify the most important search engine keywords leading to a webpage, or monitor navigation on the site.
Advertising/Targeting Cookies	These cookies are used to create your profile and serve advertisements related to your interests. They are also used to measure the effectiveness of an advertising campaign and to limit the number of times you see an advertisement. They are usually placed with the permission of the website owner by advertising networks. If you do not allow these cookies, you will not experience our targeted advertisements on different websites.

Cookies are also categorized according to their storage duration and source.

Cookies by storage period:

Session Cookies	These cookies expires when you close your browser.
Persistent Cookies	These cookies remain on your device's hard drive for a long period of time or indefinitely until you delete them, in order to remember your preferences.

Cookies by source:

First-Party Cookies	Created by the website you visit.
Third-Party Cookies	Created by third parties such as other websites, business partners, or service providers. They allow the use of certain functions and ad tracking.

3. COOKIE MANAGEMENT

- Except for Necessary Cookies, you can manage your consent preferences for cookies through the Cookie management panel displayed upon your first visit to our Website, and you can withdraw your previously given consent at any time. You can turn the buttons on the Cookie management panel on or off according to your preferences. It is recommended to refresh the page for your settings to take effect.
- You can also manage your Cookie preferences by changing your internet browser settings. These settings vary depending on the device and internet browser you use. Below are links you can use to manage cookies through commonly used browsers:

Google Analytics	https://tools.google.com/dlpage/gaoptout
Google Chrome	http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647
Internet Explorer	https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies
Mozilla Firefox	http://support.mozilla.com/en-US/kb/Cookies
Opera	http://www.opera.com/browser/tutorials/security/privacy/
Safari:	https://support.apple.com/kb/ph19214?locale=tr_TR

4. COOKIES USED ON THE SITE, PURPOSES OF PROCESSING AND LEGAL BASIS

4.1 Necessary Cookies:

These cookies are necessary for the functioning of our Site and for our visitors to use the Site, for example, to log in as a user.

The personal data collected through these cookies are processed in accordance with Article 5(2)(c) of the Law, which states that *"processing of personal data belonging to the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract"* or Article 5(2)(f), which states that *"processing of personal data is mandatory for the legitimate interests of*

the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject”

Information regarding the necessary cookies used on the Website is provided in the table below:

COOKIE NAME	COOKIE PARTY	COOKIE PROVIDER	PURPOSE OF COOKIES	COOKIE STORAGE PERIOD
AEC	Third-Party	Google	Safeguard user authentication in order to prevent spam, fraud, and misuse.	6 months
SEARCH_SAME SITE	Third-Party	Google	Helps prevent CSRF attacks by enforcing same-site cookie policies.	6 months
S	Third-Party	Google	Used to ensure session persistence with Google services.	Session lifetime

4.2 Performance (Analytics) Cookies:

Performance cookies allow us to track and analyze the number of visitors to the Website and its traffic. Through these cookies, we can obtain information such as which areas of the Website are visited most or least frequently, and optimize the Website's traffic accordingly.

For the processing activities we carry out while using first-party analytics cookies, which are statistical measurement tools used for purposes such as obtaining statistical information that do not significantly impact users' privacy—we rely on the data processing grounds stipulated in Article 5(2)(c) of the Law *“processing of personal data belonging to the parties to the contract is necessary provided that it is directly related to the establishment or performance of the contract”* or Article 5(2)(f) *“processing of data is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject”*.

For data processing activities carried out while using third-party analytics cookies, we rely on your explicit consent, if applicable, under Article 5 of the Law.

Information regarding the performance (analytical) cookies used on the Website is provided in the table below:

COOKIE NAME	COOKIE PARTY	COOKIE PROVIDER	PURPOSE OF COOKIES	COOKIE STORAGE PERIOD
_ga	Third-Party	Google Analytics	Gathers site statistics by anonymizing the user.	2 years
_ga_9S5KQ0R3HM	Third-Party	Google Analytics	Utilized for metrics like session count and user count.	2 months
NID, APISID, HSID, SAPISID, SSID, SID, SIDCC	Third-Party	Google	Used to ensure user preferences and security on websites utilizing Google services.	6-24 months

4.3 Advertising/Targeting Cookies

Advertising/Targeting cookies are used to enable the promotion of services offered by our Company on our Website, to present personalized and targeted advertisements to you based on your preferences and viewing history, and to enhance the effectiveness of the advertisements and promotions we provide.

With your consent, these cookies are processed based on the legal grounds of 'explicit consent' as specified in Article 5(1) of the Law.

Information regarding the advertising/targeting cookies used on the Website is provided in the table below:

COOKIE NAME	COOKIE PARTY	COOKIE PROVIDER	PURPOSE OF COOKIES	COOKIE STORAGE PERIOD
__Secure-1PAPISID, __Secure-1PSID, __Secure-1PSIDCC, __Secure-1PSIDTS	Third-Party	Google	For the purposes of delivering personalized advertisements and verifying identity.	1-2 years
__Secure-3PAPISID, __Secure-3PSID, __Secure-3PSIDCC, __Secure-3PSIDTS	Third-Party	Google	For the purposes of advanced advertising targeting.	1-2 years

5. TRANSFER OF YOUR PERSONAL DATA

As detailed in the tables under Article 4 above, your personal data collected for the purposes specified under the "Purpose of Cookie" column may be transferred to consultants, information technology infrastructure providers, and technical service providers from whom we receive services related to cookies within the scope of our legitimate interests, in accordance with the data processing conditions set out in Article 5 of the Law and the rules on the transfer of personal data set out in Articles 8.

Some cookies used on the website are provided by third-party service providers. Your personal data processed through these cookies may be transferred to our business partners and suppliers located abroad in accordance with the data processing conditions specified in Article 5 of the Law and the rules regarding the transfer of personal data specified in Article 9 of the Law.

6. YOUR RIGHTS UNDER ARTICLE 11 OF THE LAW

Requests regarding your rights under Article 11 of the Law may submitted as follows:

1. By sending a written request by handwritten signature along with a copy of a valid ID to the address: Omer Avni Mah. Bilezik Sok. No:4 Findikli, Beyoglu 34427 Istanbul
2. By applying in person with a valid ID
3. By sending to our registered electronic mail (KEP) address vitsanmumessillik@hs03.kep.tr via secure electronic signature
4. By sending from your e-mail address previously notified to our Company and registered in our system to kvkk@vitsan.com.tr

During request, it is important that you clearly state which right under Article 11 you wish to exercise and include information verifying your identity. Our Company reserves the right to request additional information and documents to verify the applicant's identity and to clarify the requests and information included in the application. Your request will be answered as soon as possible and in any case within (30) days.

For both exercising your above-mentioned rights and for all your questions regarding this Privacy Notice, you can send an e-mail to kvkk@vitsan.com.tr.

Sincerely,

Data Controller

VITSAN MUMESSILLIK VE MUSAVIRLIK A.S.

Address: Omer Avni Mah., Bilezik Sok. No:4, Findikli, Beyoglu, 34427, Istanbul

Mersis Number: 0925 0021 240 019

Phone: +90 212 252 06 00

KEP Address: vitsanmumessillik@hs03.kep.tr

E-mail: vitsan@vitsan.com.tr