

**CLARIFICATION TEXT REGARDING PROCESSING OF PERSONAL DATA OF  
VK108's CUSTOMERS / POTENTIAL CUSTOMERS**

Pursuant to the Turkish Protection of Personal Data Law no. 6698 (“**PPDL**”) and the European Union’s General Data Protection Regulation (“**GDPR**”), Valikonagi Gayrimenkul ve Turizm Yatirimlari A.S. (“**Company**”), duly incorporated as per the legislation of the Republic of Turkey, shall be able to process your personal data within the scope stated below:

You can access detailed information regarding the purpose of processing your personal data by our Company from our Privacy Policy found at [www.bilgiliholding.com](http://www.bilgiliholding.com).

**a) Purposes of Processing Your Personal Data**

Your personal data and special categories of your personal data collected shall be processed by the Company in compliance with the GDPR and the conditions stated in Article 5 and 6 of the PPDL and/or with the data subject’s explicit consent if such consent is needed for the following purposes: to plan and execute various advertisement and campaign activities of our Company’s products and services, to perform necessary operational works, to perform/pursue legal/financial works, to pursue and execute necessary works with the relevant departments in order to fulfil the Company’s activities within the scope of business relationships, sales/lease, marketing activities, events and visits.

**b) To Whom and For What Purposes Processed Personal Data Can Be Transferred**

Your collected personal data can be transferred to legally authorized agencies, group companies (You may find the up-to-date list of the companies within Bilgili Holding Group at [www.bilgiliholding.com](http://www.bilgiliholding.com)) the Company’s local/international business partners within the framework of the conditions and purposes for processing personal data outlined in Article 8 and Article 9 of the PPDL and in compliance with the GDPR, for the purposes determined hereinabove, “the necessity of the legitimate interests of the Company (used without harming your fundamental rights and freedoms)”, for the Company to fulfil its legal obligations and/or due to the data subject’s explicit consent (provided that such consent from the data subject is needed for processing).

**c) Method for Collecting Personal Data and Legal Basis Thereto**

Your personal data will be processed and acquired in any physical or electronic format in databases in Turkey and/or abroad within the framework of the law in line with the purposes outlined above in paragraphs a and b of this text and in compliance with the GDPR and the conditions stated in Article 5 and/or 6 of the PPDL and/or with the data subject’s explicit consent (provided that such consent from the data subject is needed for processing).

**d) Personal Data Subject Rights Specified in Article 11 of the PPDL**

Personal data subjects have the right to

- Find out whether or not personal data has been processed,
- Request information about the processing of personal data if it has occurred,
- Find out the purpose of processing the personal data and whether or not it was processed for this purpose,
- Know third parties to whom personal data was transferred either domestically or abroad,
- Request that personal data processed incorrectly or incompletely be corrected and request that third parties to whom the transaction in correction was made are informed,
- Request that personal data be erased or destroyed if the reasons that required processing no longer apply in spite of the fact that it was processed in accordance with the provisions of the PPDL or other applicable legislation, and request that third parties to whom personal data was transferred as part of this process be informed,
- Object to any unfavourable consequences arising from the analysis of processed data via exclusively automatic systems,
- Request remedy of damages if they incur losses due to the unlawful processing of personal data.

As a personal data subject, requests you make in connection with your rights may be sent to the Company by filling in the KVKK Data Subject Application Form found at <https://rcresidencesistanbul.com/>. Your requests shall be answered by the Company within 30 days at the

latest following its receipt. However, if a charge is specified by the Personal Data Protection Board, the cost on the fee schedule specified shall be collected by the Company.