

RAWIUS YAZILIM ANONİM ŞİRKETİ (RAWIUS SOFTWARE JOINT STOCK COMPANY)

PERSONAL DATA PROCESSING, RETENTION AND DESTRUCTION POLICY (PRIVACY POLICY)

1. Purpose

[] (“**Rawius**”) is the owner and operator of an interactive platform, accessible through the website with the extension rawius.com (the “**Website**”), on which local guides who evaluate businesses serving consumers in various ways come together.

Based on this purpose, this Personal Data Processing, Retention and Destruction Policy (the “**Privacy Policy**”) aims to ensure that all personal data processed and to be processed by Rawius are processed in accordance with the rules set out in this policy, so that Rawius may continue its activities in compliance with both the KVKK and the GDPR and so that the risks that may arise in this context are minimized; and it sets out the methods and principles to be followed in order to ensure that such personal data are processed and protected in compliance with the KVKK, the GDPR, international agreements and their secondary legislation.

2. Scope

Rawius is aware of its responsibilities regarding the protection and legal safeguarding of personal data, which is regulated as a constitutional right, and attaches importance to the secure processing of all personal data processed by Rawius.

The Privacy Policy shall apply to all processes in which Rawius is involved as a data controller and/or data processor. Third parties and companies with which Rawius employees share information jointly shall also be assessed within the same scope.

This Privacy Policy is implemented by Rawius, together with the relevant detailed policies and procedures and the attached documents, in all activities carried out for the processing and protection of all personal data.

3. Definitions

Explicit Consent : Consent relating to a specific subject, based on information and expressed with free will, given by the relevant person for the processing of personal data

Constitution : The Constitution of the Republic of Türkiye dated 7 November 1982 and numbered 2709, published in the Official Gazette dated 9 November 1982 and numbered 17863

GDPR

: General Data Protection Regulation (EU) 2016/679

Personal Data

: Any information relating to an identified or identifiable natural person

Anonymization, Deletion and Destruction of Personal Data:

Anonymization; the process of rendering personal data impossible to link with an identified or identifiable natural person in any way, even by matching them with other data

Deletion; the process of rendering personal data inaccessible and unusable in any way for the relevant users

Destruction; the process of rendering personal data inaccessible, irretrievable and unusable by anyone in any way

Processing of Personal Data : Any operation performed on personal data, such as obtaining, recording, storing, retaining, altering, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of such data, whether wholly or partly by automatic means or, provided that it forms part of any data filing system, by non-automatic means

Board

: Personal Data Protection Board

Authority

: Personal Data Protection Authority

KVKK : Law No. 6698 on the Protection of Personal Data, published in the Official Gazette dated 7 April 2016 and numbered 29677

Special Categories of Personal Data : Data relating to persons’ race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and attire, membership of associations,

foundations or trade unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data

Rawius : [], acting as a data controller and/or data processor

Data Processor : Natural and/or legal persons who, outside the organization of the data controller, process personal data of natural persons on the basis of the authority and instructions received from the data controller

Data Subject and/or

Relevant Person

: All natural persons whose personal data are processed by Rawius

Data Controller : The data controllers specified above, who determine the purposes and means of processing personal data and are responsible for establishing and managing the data filing system

Periodic Destruction : The process of deletion, destruction or anonymization to be carried out ex officio at recurring intervals where all of the conditions for processing personal data set out in the Law cease to exist

4. Implementation of the Policy

This Privacy Policy does not invalidate the data protection requirements set out in Rawius's other policies, procedures and documents that are determined in addition to the terms contained herein or that provide at least the same standard of personal data protection as this policy.

Where this Privacy Policy contains additional terms or requires a higher standard for the protection of personal data, it shall override the relevant data protection requirements in Rawius's other policies.

Rawius's other documents relating to data processing and data security are as follows. The definitions and abbreviations in this Privacy Policy shall also apply to these documents and texts to the extent applicable.

Other Related Documents

- Privacy Notices
 - Privacy Notice on the Protection of Personal Data (Rawius.com member)
 - Privacy Notice on the Protection of Personal Data (Rawius employee)
- Website User Agreement
- Cookie Policy
- Data Subject Application Form

In the process of processing and protecting personal data, the relevant legislative provisions in force shall apply as a matter of priority. In the event of a conflict between the provisions of the legislation and the provisions of the Privacy Policy, Rawius accepts that the current legislative provisions shall prevail.

The Privacy Policy has been prepared by arranging Rawius's services in accordance with the rules set out by the relevant legislation.

As a data controller, Rawius;

- To prevent the unlawful processing of personal data,
- To prevent the unlawful transfer of personal data,
- To prevent unlawful access to personal data,
- To ensure the security of personal data,

is obliged to take all necessary technical and administrative measures to ensure an appropriate level of security.

The main sources of Rawius's obligations regarding the protection of data are the KVKK, the GDPR and the related secondary legislation.

5. Matters Concerning the Protection of Personal Data and Personal Data Processed

A Personal Data Processing Inventory has been prepared by Rawius in order to identify the personal data processed within Rawius.

The processing of data other than those specified in the inventory within Rawius is in principle prohibited. However, where the processing of a new data group becomes mandatory and/or necessary for Rawius's activities, the new data group may be processed after the necessary addition is first made to the inventory.

In the inventory, the data processed by Rawius have been divided into categories on an activity basis. In this context, the activities in which data are processed within Rawius consist of your registration on the Website as a user and, if you grant permission for commercial electronic messages, the sending of commercial electronic messages to your e-mail address.

In addition, data may currently be processed within Rawius for the purposes of concluding and performing employment contracts with employees and job candidates and carrying out support services such as legal and accounting services.

a. Conclusion and Performance of the Employment Contract and Recruitment

The data in this section cover only the persons working at Rawius and not the customers of our company. Within the scope of the conclusion and performance of the employment contract, Rawius, as the data controller, processes employees' identity, contact, audio and visual recordings, personnel file, financial and health data.

b. Conclusion of the Membership Agreement

In order for the Website to be used, a user agreement must be concluded between the users and Rawius. In this context, Rawius, as the data controller, processes users' first name and surname, e-mail address, telephone number, country/province/district information and Google Local Guides level information.

c. Support Services

Within the scope of support services, the identity, contact and financial data of third parties from whom support is obtained (lawyers, consultants, accountants, etc.) are processed.

d. Product Management

For the sale of the products on the Website and for the purpose of concluding agreements with authors for the assignment of copyright in written, verbal, visual and audio content, identity, contact and financial data as well as audio and visual recording content are processed.

5.2. Data Processing Based on Privacy Notices

In accordance with the laws in force, Rawius informs data subjects about the processing and transfer of their personal data.

In this context, privacy notices have been prepared for all groups of persons whose data are processed by Rawius. These privacy notices have been prepared in accordance with Article 10 of the KVKK, Article 13 of the GDPR, and the "Communiqué on the Procedures and Principles to be Followed in Fulfilling the Obligation to Inform" and the "Guideline on Fulfilling the Obligation to Inform" published by the Authority.

These Privacy Notices must be duly announced in places where data subjects can see them or must be notified to data subjects.

In the event that a new group of persons arises, a privacy notice must first be prepared for the new group of persons before data processing begins, and these persons must also be informed in accordance with the legislation.

5.3. Data Minimization, Protection of Special Categories of Personal Data and Explicit Consent

Within the scope of the principle of data minimization, Rawius processes data that are mandatory, necessary and/or important for its activities, and does not process any data other than these, destroying them immediately.

Rawius exercises utmost care not to process persons' special categories of personal data within the scope of its main activities.

5.4. Measures Concerning Data Security

Rawius has carried out an analysis identifying what personal data exist and what risks may arise regarding the protection of such data, and takes the necessary technical and administrative measures to ensure an appropriate level of security in order to prevent the unlawful processing of the personal data being processed, to prevent unlawful access to personal data and to ensure the safekeeping of personal data.

5.4.1. Administrative Measures Concerning Data Security

- Rawius has its personnel who have access to personal data sign undertakings regarding data security and requires these employees to comply with these provisions. In addition, the

necessary training and information sessions are provided to employees.

- An authorization matrix has been prepared specifying which data employees and other service providers are authorized to access, whether online or physically.
- A disciplinary regulation covering data processing and information security matters has been prepared and put into effect.
- The provisions of the disciplinary regulation apply to employees who attempt to access data they are not authorized to access, or who corrupt or disclose data.
- Persons qualified as “Data Processors” under service agreements concluded with Rawius are informed about data protection law and about taking the necessary measures in accordance with this law. Confidentiality undertakings have been signed with these persons, and provisions on data confidentiality will be added to agreements to be signed in the future, or a confidentiality undertaking will be signed with the other party to the agreement.
- The agreements concluded by Rawius have been reviewed in terms of the KVKK, and the changes deemed necessary in these agreements have been made.

5.4.2 Technical Measures Concerning Data Security

- The personal data processing activities carried out by Rawius are audited through information security systems, technical systems and legal methods.
- External services are obtained on technical matters.
- Technical measures are taken in line with technological developments, and the measures taken are periodically checked, updated and renewed.
- Access authorizations are restricted, and authorizations are reviewed regularly.
- Software and hardware, including virus protection systems and firewalls, are installed.
- Data are stored only on information system devices located at the Company’s headquarters.
- Backup programs are used to ensure that personal data are stored securely.
- Security systems are used for storage areas, the technical measures taken are periodically reported to the relevant person in accordance with internal controls, and matters posing risks are re-evaluated and the necessary technological solutions are developed.
- In order to be prepared for any personal data security breach, crisis and reputation management has been discussed, and the processes for notifying the Board and the relevant person in this context have been designed within this Policy.

5.5. Principles to Be Observed in the Processing of Personal Data

In accordance with Article 4 of the KVKK and Article 5 of the GDPR, Rawius processes personal data in compliance with the law and the rules of good faith, accurately and, where necessary, up to date, for specified, explicit and legitimate purposes, and in a manner that is related to, limited to and proportionate to those purposes:

5.5.1. Processing in Compliance with the Law and the Rule of Good Faith

Rawius acts in accordance with the principles introduced by legal regulations and the general rule of trust and good faith in the processing of personal data. In this context, Rawius takes into account the requirements of the principle of proportionality in the processing of personal data and does not process or use personal data beyond what the purpose requires.

5.5.2. Ensuring that Personal Data Are Accurate and, Where Necessary, Up to Date

Rawius ensures that the personal data it processes are accurate and up to date, taking into account the fundamental rights of personal data subjects and its own legitimate interests. In this context, in accordance with this policy, data are destroyed periodically and twice a year, as detailed under heading 9.3 below.

5.5.3. Processing for Specified, Explicit and Legitimate Purposes

Rawius clearly and precisely determines its legitimate and lawful purpose for processing personal data. Rawius processes personal data only to the extent connected with and necessary for the products and services it offers. The purposes for which personal data will be processed by Rawius are set out before the personal data processing activity begins, and the groups of data subjects are informed accordingly.

5.5.4. Being Related to, Limited to and Proportionate to the Purposes for Which They Are Processed

Rawius processes personal data in a manner suitable for achieving the specified purposes and avoids processing personal data that are not related to the achievement of the purpose or are not needed. In addition, Rawius makes data available only to personnel for whom it is necessary for achieving the purpose of processing and, in some exceptional cases, to data processors; persons other than these, whose access to the data is not necessary for the purpose of processing, cannot access the data.

5.5.5. Retention for the Period Stipulated in the Relevant Legislation or Required for the Purpose for Which They Are Processed

Rawius retains personal data only for the period stipulated in the relevant legislation or required for the purpose for which they are processed. In this context, Rawius first determines whether the relevant legislation stipulates a period for the retention of personal data; if a period has been stipulated, it acts in accordance with that period, and if no period has been stipulated, it retains the personal data for the period required for the purpose for which they are processed. Upon the expiry of the period or the disappearance of the reasons requiring their processing, personal data are destroyed by Rawius.

6. Transfer of Personal Data

6.1. Domestic Transfer of Personal Data

Rawius is responsible for acting in accordance with the provisions of the KVKK, the decisions taken by the Board and the relevant regulations regarding the transfer of personal data.

Personal data and special categories of personal data relating to the relevant persons cannot be transferred by Rawius to other natural or legal persons without the explicit consent of the relevant person. However, in cases where the KVKK and other laws so require, data may be transferred without the explicit consent of the relevant person to the administrative or judicial authorities or bodies authorized, in the manner and within the limits stipulated in the legislation. In this context, the necessary explicit consents are obtained. In addition, transfer is also possible without the consent of the relevant person in the cases stipulated in Articles 5 and 6 of the Law. Rawius transfers personal data in accordance with the conditions stipulated in the Law and other relevant legislation, and by signing confidentiality undertakings with Data Processors, ensures that they too take administrative and technical measures regarding data security.

6.2. Transfer of Personal Data Abroad

There is no transfer of data abroad.

6.3. Institutions and Organizations to Which Transfers Are Made

Information requested by public legal entities within the scope of their relevant legislation is shared pursuant to Article 8 of the KVKK.

For the purposes stated above, personal data are transferred to natural and legal persons from whom services are obtained or with whom cooperation exists under the relevant agreements, and to authorized public institutions and organizations.

7. Rights of Data Subjects

Personal data subjects may submit their requests regarding the rights listed below to Rawius, free of charge except for the exceptions specified in the legislation, with information and documents that will establish their identity and by the methods specified below or other methods determined by the Board.

In this regard, the relevant persons are informed through privacy notices. In the event that an application is received in this context, it must be answered within 30 days, including by consulting the relevant consultants and lawyers.

Persons who fail to notify the necessary internal company authorities of an application made by the relevant person, or who fail to perform the requirements of their job description, may be penalized under the Disciplinary Regulation.

8. Personal Data Breach and Notification to the Board

In the event that personal data processed by Rawius are obtained by others through unlawful means, Rawius shall immediately notify the consultants and lawyers.

Rawius is required to notify the relevant person and the Board of the breach that has occurred within 3 days.

Persons who become aware of a breach but fail to notify the necessary internal company authorities, or who fail to perform the requirements of their confidentiality undertakings and their other obligations towards Rawius relating to data security, may be penalized under the Disciplinary Regulation.

9. Retention and Destruction of Personal Data

9.1. Principles

In the processes of retention and destruction of personal data, Rawius acts within the framework of the principles set out below:

In the deletion, destruction and anonymization of personal data, action is taken in full compliance with the Law and the provisions of the relevant legislation, the Board's decisions and this Policy.

All transactions relating to the deletion, destruction and anonymization of personal data are recorded by Rawius, and such records are retained for at least 3 (three) years, excluding other legal obligations.

Unless a contrary decision is taken by the Board, Rawius selects the appropriate method from among the methods of ex officio deletion, destruction or anonymization of personal data. However, upon the request of the Relevant Person, the appropriate method shall be selected with its reasons explained.

Where all of the conditions for processing personal data set out in Articles 5 and 6 of the Law cease to exist, personal data are deleted, destroyed or anonymized by Rawius ex officio or upon the request of the relevant person. Where the Relevant Person applies to Rawius in this regard:

- The requests submitted are answered within 30 (thirty) days at the latest, and
- If the data subject to the request have been transferred to third parties, this is notified to the third party to whom the data were transferred, and it is ensured that the necessary actions are carried out by such third parties.

9.2. Explanations Regarding the Reasons Requiring Retention and Destruction

The personal data of data subjects are retained by Rawius within the limits set out in the Law and other relevant legislation, in particular for (i) the continuation of commercial activities, (ii) the fulfillment of legal obligations, and (iii) the planning and performance of employee rights and fringe benefits.

The reasons requiring retention are as follows:

- Retention of personal data because they are directly related to the conclusion and performance of agreements,
- Retention of personal data for the establishment, exercise or protection of a right,
- Retention of personal data being mandatory for Rawius's legitimate interests, provided that this does not harm the fundamental rights and freedoms of persons,
- Retention of personal data for the purpose of fulfilling any legal obligation of Rawius,
- Express provision for the retention of personal data in the legislation,
- The existence of the explicit consent of data subjects with respect to retention activities that require obtaining their explicit consent.

Pursuant to the Regulation, in the cases listed below, the personal data of data subjects are deleted, destroyed or anonymized by Rawius, ex officio or upon request, in the first periodic destruction process:

- Where it becomes necessary due to the amendment or repeal of the relevant legislative provisions forming the basis for the processing or retention of personal data,
- The disappearance of the purpose requiring the processing or retention of personal data,
- In cases where the processing of personal data is carried out solely on the basis of explicit consent, the withdrawal of explicit consent by the relevant person,
- The acceptance by the data controller of the relevant person's application for the deletion, destruction or anonymization of his or her personal data within the framework of his or her rights under Article 11 of the Law,

- In cases where the data controller rejects the application made to it by the relevant person requesting the deletion, destruction or anonymization of his or her personal data, finds the response it has given inadequate, or fails to respond within the period stipulated in the Law; the filing of a complaint with the Board and the Board's finding this request appropriate,
- The absence of any condition justifying the retention of personal data for a longer period, even though the maximum period requiring their retention has passed.

9.3. Retention and Destruction Periods

In determining the retention and destruction periods of your personal data obtained by Rawius in accordance with the Law and other relevant legislative provisions, the criteria set out below, in order, are used:

- If a period is stipulated in the legislation for the retention of the personal data in question, this period is observed. Following the expiry of that period, the data are dealt with in accordance with the following paragraph.
- Where the period stipulated in the legislation for the retention of the personal data in question has expired, or where no period has been stipulated in the relevant legislation for the retention of the data in question, the following apply, respectively;
 - Personal data are classified as personal data and special categories of personal data, based on the definition in Article 6 of the Law. All personal data determined to be of a special nature are destroyed. The method to be applied in the destruction of such data is determined according to the nature of the data and the degree of importance of their retention for Rawius.
 - The compliance of the retention of the data with the principles set out in Article 4 of the Law is examined; for example, it is queried whether Rawius has a legitimate purpose for retaining the data. Data whose retention is determined to potentially constitute a violation of the principles set out in Article 4 of the Law are deleted, destroyed or anonymized.
 - It is determined under which of the exceptions provided for in Articles 5 and 6 of the Law the retention of the data may be assessed. Within the framework of the exceptions identified, the reasonable periods for which the data must be retained are determined. Upon the expiry of those periods, the data are deleted, destroyed or anonymized.

The retention periods determined by Rawius can be accessed from the inventories prepared by Rawius and from the Table of Personal Data Retention and Destruction Periods, which constitutes an annex to this Privacy Policy. Personal data whose retention period has expired are deleted or destroyed at 6 (six)-month intervals in accordance with the procedures set out in this Privacy Policy.

Periodic destruction is carried out twice a year. The first periodic destruction is carried out in June of each year, and the second periodic destruction is carried out in December of each year.

All transactions relating to the deletion, destruction and anonymization of personal data are recorded by minutes, and such records are retained for at least 3 (three) years, excluding other legal obligations.

9.4. Procedures for the Retention and Destruction of Personal Data

9.4.1. Personal Data Held on Servers

For personal data held on the servers located at Rawius's headquarters whose retention period has expired, the system administrator carries out deletion by removing the access authorization of the relevant users.

9.4.2. Personal Data Held in Physical Media

Personal data held in paper form whose retention period has expired are destroyed in an irreversible manner by means of paper shredders or by delivering them to companies that carry out destruction services.

10. Entry into Force

This Privacy Policy prepared by Rawius has entered into force together with its annexes pursuant to the decision taken by Rawius. This Privacy Policy shall be announced to all employees and, as of its entry into force, shall be binding on all business units, consultants, external service providers and everyone who processes personal data.

Monitoring whether employees comply with the requirements of the Privacy Policy shall be the responsibility of the supervisors of the employees concerned. When conduct contrary to the Policy is detected, the matter shall be immediately reported by the employee's supervisor to the next higher supervisor to whom he or she reports.

Action shall be taken against an employee who acts contrary to the Policy in accordance with the Workplace Disciplinary Regulation.

In the event of any inconsistency between the provisions of the KVKK, the GDPR and other relevant legislation and this Policy, the KVKK and the provisions of other relevant legislation shall apply in the first instance.

Annexes to the Policy:

- Privacy Notices
 - Privacy Notice on the Protection of Personal Data (Rawius.com member)
 - Privacy Notice on the Protection of Personal Data (Rawius employee)
- Website User Agreement
- Cookie Policy
- Data Subject Application Form