

İŞ GAYRİMENKUL YATIRIM ORTAKLIĞI A.Ş.
PROTECTION OF PERSONAL DATA AND
PRIVACY POLICY

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PROTECTION OF PERSONAL DATA AND PRIVACY POLICY

I. INTRODUCTION

As İş Gayrimenkul Yatırım Ortaklığı A.Ş. (“**Is REIC**”), we attach great importance to the protection of the personal data of our customers who contact us personally or as a representative of a company or organization, our business partners, our shareholders, our employees, and other real persons who establish a relationship with us by applying for a job or visiting our website or in any other way.

As the data controller, we have prepared this Personal Data Protection and Privacy Policy (“**Policy**”) to explain our rules and policies regarding the processing of personal data and the use of cookies and similar technologies within the framework of the Personal Data Protection Law No. 6698 (“**KVK Law**”). Depending on the type and nature of the relationship between **Is REIC** and the data subject, it is possible to provide data subjects with personal data policies and/or notifications different from this Policy. These special policies and notifications provided to data subjects may contain issues that are different from or in addition to the statements in this Policy. In this case, the special policies and notifications provided to the data subjects must be taken into consideration first.

Expressions such as "we" and "our" in this Policy are used to refer **Is REIC** unless otherwise explicitly stated.

II. PERSONAL DATA

A. Personal Data Definition

Within the framework of KVK Law m.3/I(d), “*personal data*” indicates all kinds of information regarding identified or identifiable real persons. In this context, anonymous information, anonymized information and other data that cannot be associated with a specific person are not regarded as personal data within the scope of this Policy.

B. General Principles Regarding the Processing of Personal Data

All kinds of processing that can be carried out on personal data, such as obtaining, recording, storing, retaining, changing, rearranging, explaining, transferring, acquiring, making available, classifying, or preventing from use of personal data completely or partially automatically or non-automatically provided that it is a part of any data recording system within the framework of KVK Law Article 3/I(e) are included in the scope of "data processing".

As **Is REIC**, we process personal data in accordance with the principles listed below within the framework of the purposes set out under the heading "*Purposes of Processing Personal Data*" of this Policy:

- (i) Compliance with the law and the rules of honesty,
- (ii) Being accurate and up-to-date when necessary,
- (iii) Processing for specific, explicit and legitimate purposes,
- (iv) Being in connection, limited and restrained with the purpose for which they are processed,
- (v) To be kept for the period required by the relevant legislation or for the purpose for which they are processed.

C. Data Processed by Is REIC

Is REIC may process general and special personal data with the explicit consent of the data subject or without explicit consent in cases stipulated in Articles 5 and 6 of the KVK Law. Sensitive personal data contain more sensitive information about the data subject by definition. Pursuant to Article 6 of the KVK Law, a real person's race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, attire and clothing, membership of an association, foundation or union, health, sexual life, criminal conviction and security measures, as well as biometric and genetic data are regarded as sensitive personal data.

General and sensitive data processed by **Is REIC** are exemplified below. In addition, which data to be processed for each data subject; may vary depending on various factors such as the type and nature of the relationship between the data subject and **Is REIC** and the communication channels used. In line with the relevant legislation and the principles set forth in this Policy, the following types of data can be processed by **Is REIC**:

- (i) Data for recognizing the data subject, such as name, surname, profession, title, information about the institution/organization worked, educational background, employment history, gender, marital status, citizenship status, tax liability status and, if applicable, information about parents, guardians and attorneys,
- (ii) Data such as date of birth, place of birth, identity number, blood group, religion and photograph included in identification documents such as ID, passport, driver's license,
- (iii) Contact information such as address, telephone, e-mail and fax number of home, workplace or temporary residence,

- (iv) products, projects and services which were offered, purchased and found to be suitable for the data subject; contact records such as phone calls, e-mail correspondences with **Is REIC** and other audio and video data,
- (v) Internet protocol (IP) address, device ID, unique identifier information, device type, advertising ID, unique device icon, statistics on website views, inbound and outbound traffic information, redirect URL, internet log information, location information, the sites visited and information about the transactions and actions performed through our websites, platforms, internet network, advertisements and e-mail contents.

D. Purposes of Processing Personal Data

Is REIC may process personal data for the following purposes and they may be kept for as long as these purposes require:

- (i) Fulfillment of legal and administrative obligations by **Is REIC**,
- (ii) Negotiation, establishment and fulfillment of contracts concluded/considered to be concluded,
- (iii) Identifying suitable products, projects and services for customers, customizing and developing them for customers, providing effective customer service,
- (iv) Ensuring and improving coordination, cooperation and efficiency within or between units within the body of **Is REIC**,
- (v) Ensuring the security of the website and other electronic systems and physical environments owned or used by **Is REIC**,
- (vi) Notifying the changes in the legislation or in the rules and policies accepted by **Is REIC** or making other notifications concerning the data subject,
- (vii) Promotion and marketing of **Is REIC** or **Is REIC**'s projects and services, and their development, and obtaining the opinion of the data subject through surveys and voting,
- (viii) Celebrating birthdays, being included in lotteries or competitions, giving gifts and other similar events, promotions and campaigns in favor of the data subject,
- (ix) Investigation, detection, prevention of violations of the Agreement and the law, and reporting them to the relevant administrative or judicial authorities,
- (x) Settling current and future legal disputes,
- (xi) Answering requests and questions,

- (xii) In case of restructuring of **Is REIC** or Group of İş Bankası or in case that **Is REIC** is subject to transactions such as a merger, demerger, change of type, and change of control, these transactions are carried out in a healthy manner,
- (xiii) Carrying out corporate and partnership law proceedings
- (xiv) To meet the employee needs within the framework of **Is REIC**'s human resources policies and to carry out, develop and improve the recruitment processes,
- (xv) Evaluating and finalizing the suitability of job applications and communicating with job applicants,
- (xvi) Developing and improving the human resources, public relations and marketing policies of **Is REIC**,

E. Transfer of Personal Data Inside and Outside of Turkey

Provided that we comply with the general principles listed in Article 4 of the KVK Law and the conditions stipulated in Articles 8 and 9, and take the necessary security measures, we may transfer personal data to the domestic and foreign third parties with the purposes indicated under the "*Purposes of Processing Personal Data*" of this Policy and process and store it on domestic and foreign servers or other electronic media

The third parties to whom personal data can be transferred may vary depending on various factors such as the type and nature of the relationship between the data subject and **Is REIC** and the markets in which processings are made, however, the third parties to whom the data can be transferred are generally as follows:

- (i) İş Bankası Group companies,
- (ii) Capital Markets Board, Capital Markets Licensing Registry and Training Agency Inc., Borsa İstanbul and other authorized institutions and organizations in the country and abroad, and authorized third parties,
- (iii) Infrastructure providers and other business partners, suppliers and subcontractors that **Is REIC** works with in the country and abroad,
- (iv) In case **Is REIC** or İş Bankası Group is restructured or **Is REIC** is subject to processes such as a merger, demerger, or change of control, third parties to the relevant processes.

F. Method and Legal Reason of Personal Data Collection

Is REIC may collect personal data in written, verbal form, audio or video recording or other physical or electronic forms within the framework of the conditions set forth in Articles 5 and 6 of the KVK Law and for the purposes specified under the "*Purposes of Processing Personal Data*" heading of this Policy. Personal data; may be collected through the general directorate, branches, sales offices and other physical environments that data subjects can contact, call centers, websites, mobile applications, electronic transaction platforms, social media and other public channels or organized training, conferences and similar events or through inquiry method.

While **Is REIC** generally obtains personal data from data subjects, personal data may also be obtained within the framework of the conditions specified in Articles 5 and 6 of the KVK Law through other group companies of İş Bankası Group, business partners and subcontractors that **Is REIC** works with in their projects, Capital Markets Board, Central Registry Agency and other authorized institutions and organizations, the person referenced in job applications or included in the applicant's work and education history, institutions and organizations, recruitment platforms, persons and institutions represented by the data subject/representing the data subject.

G. Legal Reasons for the Processing of Personal Data

Is REIC operates personal data; based on your explicit consent or the legal reasons listed below:

- Clearly stipulated in the law,
- It is necessary to process the personal data of the parties to the contract, provided that it is directly related to the establishment or fulfillment of a contract,
- Obligatory in order to fulfill our legal obligation,
- The data has been made public by the data subject himself,
- Data processing is mandatory for the establishment, exercise or protection of a right.
- Data processing 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.

H. Retention Period of Personal Data

Except for cases where a longer period of time is legally required or permitted, **Is REIC** keeps personal data only for the period necessary for the realization of the purposes specified in this Policy. Personal data whose retention period has expired are deleted, eliminated or anonymized by **Is REIC** pursuant to Article 7 of the KVK Law.

I. Personal Data Security and Inspection

Within the framework of Article 12 of the KVK Law, **Is REIC** takes the necessary technical and administrative measures to ensure the appropriate level of security as the data controller, in order to prevent the unlawful processing of personal data and illegal access to the data and to ensure the retention of personal data. For this purpose, **Is REIC**;

- (i) ensures that the business processes and activities of the company are carried out in accordance with the internal policies and rules prepared for the protection of personal data,
- (ii) makes sure that the studies carried are out to raise awareness among employees about the personal data protection legislation and the internal policies and rules prepared in this direction,
- (iii) makes sure that necessary declarations and commitments are taken from employees and individuals and institutions that process data on behalf of **Is REIC** for the confidentiality and protection of data, and violations of these declarations and commitments are subject to certain sanctions,
- (iv) ensures that necessary information security measures are implemented to ensure the security of personal data inside and outside the company and to prevent unauthorized access to data,
- (v) ensures that compliance with the internal policies and rules established for the protection of personal data is periodically audited and the results are regularly reported to the board of directors,
- (vi) makes sure that the adequacy of the measures taken is subject to control at certain periods and the existing data security system is aimed to be continuously improved according to the needs and possibilities.

J. Rights of the Data Subject within the Framework of the KVK Law

Pursuant to Article 11 of the KVK Law, data subjects have the following rights:

- (i) to learn whether their personal data is processed,
- (ii) to request information on personal data if it has been processed,
- (iii) to learn the purpose of processing personal data and whether they are used in accordance with its purpose,
- (iv) to know the third parties to whom personal data is transferred in the country or abroad,

- (v) to request correction of personal data in case of incomplete or incorrect processing,
- (vi) to request deletion or elimination of personal data, in the event that the reasons for the processing of personal data no longer exist,
- (vii) to request the correction and deletion processes to be notified to the third parties to whom the personal data has been transferred,
- (viii) to object to the emergence of a negative result by analyzing the processed data exclusively through automated systems,
- (ix) to request compensation for the damage in case of loss due to the unlawful processing of personal data

In the event that data subjects want to use any of their rights mentioned above, they can fill in the [Data Subject Application Form](#) and submit it to us so that the relevant requests can be evaluated in a healthier manner.

Is REIC shall evaluate and finalize requests from data subjects within thirty days at the latest, depending on the nature of the request, within the framework of Article 13 of the KVK Law. Positive or negative responses to requests from data subjects can be notified as in writing or electronically. While the requests of data subjects shall be finalized free of charge as a rule, if the response to the request requires an additional cost, a fee may be charged in the amounts determined within the framework of the relevant legislation.

III. COOKIES AND SIMILAR TECHNOLOGIES

A. General

While accessing **Is REIC** websites, electronic platforms, applications, or e-mail messages or advertisements sent by **Is REIC**, small data files may be placed on users' computers, mobile phones, tablets, or other devices used to record and collect specific data. These data files placed on computers and other devices may be cookies, pixel tags, flash cookies and web beacons, as well as other technologies with data storage purposes. In this Policy, the term "*cookie*" is used to indicate cookies and similar technologies that may be used by **Is REIC**.

It is possible to collect personal data through cookies, however, any data collected through cookies may not be considered personal data. For this reason, it should be taken into account that the data obtained through cookies will only be evaluated within the scope of this Policy and the KVK Law to the extent that they constitute personal data within the framework of Turkish law.

B. Types of Cookies

Cookies can be classified in terms of duration or according to the domain they belong to. If they are classified in terms of duration, cookies are divided into two: session cookies and permanent cookies. While session cookies refer to cookies that are deleted when the user closes the browser, persistent cookies are cookies that remain on the user's computer/device for a predetermined period.

If cookies are classified according to the domain they belong to, they are divided into two: related party cookies and third party cookies. While cookies placed by the visited domain are called related party cookies, cookies placed by a different visited domain are referred to as third party cookies. In the event that people outside the visited domain place a cookie on the user's device through the visited domain, a third party cookie is in question.

C. Purposes of Use of Cookies

Is REIC may benefit from the cookies it uses on its websites, platforms, applications, advertisements, and messages for the following purposes.

- (i) Uses for operational purposes:** We may use cookies that we deem necessary for the administration and security of **Is REIC** website, platform, applications, and services. Technologies that allow the use of functions on websites, applications, and platforms, and cookies used to detect irregular behavior in these channels may be shown as examples of cookies used for operational purposes.
- (ii) Function-oriented uses:** **Is REIC** may use cookies to facilitate the use of its website, platform, applications, and services and to customize them for users. Technologies that enable us to remember user information and preferences may be shown as examples of cookies used for functional purposes.
- (i) Performance-oriented uses:** **Is REIC** may also use cookies to increase and measure the performance of its website, application, platform, and services. Cookies that allow us to understand how users use the **Is REIC** website, application, platform, and services, and to analyze user behavior, and technologies that allow us to understand whether the messages we send are interacted with may be shown as examples of cookies used for this purpose.
- (ii) Uses for advertising purposes:** We may use related party cookies and third party cookies for the purpose of transmitting advertisements and similar content related to the

interests of users through the websites, platforms, and applications of **Is REIC** or third parties. Cookies that measure the effectiveness of ads and cookies that show whether a particular ad has been clicked on or how many times the ad has been viewed may be shown as examples of uses for advertising purposes.

D. Refusing and Deleting Cookies

Most browsers allow the use of cookies, however, users can refuse or delete cookies at any time by changing their browser settings. The method of changing the settings varies according to the browser used, and how to disable cookies should be learned from the service provider for the browser used.

In the event that cookies are disabled, some features of **Is REIC**'s website, application, platform, and services may not be available.

E. Authorized Service Providers

We may get help from some service providers that we have authorized for the execution and promotion of **Is REIC** website, platform and applications, and services. These service providers will also be able to place cookies and similar technologies (third party cookies) on users' computers/devices and collect information such as IP address, unique identifier, and device identifier to identify the user's device.

IV. THIRD PARTY WEBSITES, PRODUCTS AND SERVICES

Is REIC websites, platforms and applications may contain links to third-party websites, products and services. The relevant links are subject to the privacy policies of third parties, and it should be noted that third parties and websites belonging to third parties are independent of **Is REIC** and that **Is REIC** is not responsible for the privacy practices of third parties. In the case of visiting the linked websites, we recommend that you read the privacy policies of these websites.

V. AMENDMENTS

It is possible that we make changes in this Personal Data Protection and Privacy Policy from time to time. The current version of the Policy can be accessed on the **Is REIC** website, and the changes that can be made in the Policy can be followed on the **Is REIC** website.

As a rule, the changes will be made by uploading them to the **Is REIC** website and will become effective as of this date, and changes to **Is REIC** may also be notified in other ways it deems appropriate.