

**COFACE SİGORTA A.Ş.
PERSONAL DATA PROTECTION
AND PRIVACY POLICY**

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A. SCOPE

This Policy on the Personal Data Protection and Privacy has been prepared to explain the whole of rules governing the processing of personal data and provide the necessary information. The Policy has been approved by the management of Coface Sigorta Anonim Şirketi (“Coface”) and took effect on 03.04.2018.

B. DEFINITIONS

Personal data:	Any information relating to an identified or identifiable natural person, thus allowing the identification of a person as it involves concrete contents characterizing the person’s physical, economic, cultural, social or psychological identity or is linked with any register such as ID, tax or insurance number.
Sensitive personal data:	Data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data.
Explicit consent:	Freely given specific and informed consent.
Anonymization:	Rendering personal data by no means identified or identifiable with a natural person even by linking with other data.
Processing of personal data:	Any operation which is performed on personal data such as collection, recording, storage, preservation, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization or blocking its use by wholly or partly automatic means or otherwise than by automatic means which form part of a filing system. Any type of operation performed on personal data beginning from their initial generation is covered by this term.
Data Subject:	Natural person whose personal data are processed
Data filing system:	Any recording system through which personal data are processed by structuring according to specific criteria.
Data controller:	Natural or legal person who determines the purposes and means of the processing of personal data, and who is responsible for establishment and management of the filing system
Data processor:	Natural or legal person who processes personal data based on the authority granted by and on behalf of the data controller
PDPL:	Personal Data Protection Law, numbered 6698 and dated 24 March 2016, published in the Official Gazette no. 29677 dated 7 April 2016
Board:	Personal Data Protection Board
Authority:	Personal Data Protection Authority
Policy:	Personal Data Protection and Privacy Policy of Coface Sigorta A.Ş.

C. REFERENCES

Personal Data Protection Law (‘PDPL’):	Personal Data Protection Law, numbered 6698 and dated 24 March 2016, published in the Official Gazette no. 29677 dated 7 April 2016, which forms the subject matter of this Policy.
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D. AMENDMENTS

The secondary legislation put into force under the Law or amendments made to this Policy from time to time can be followed up from the corporate website of Coface, and an up-to-date version of this Policy will also be available on this corporate website.

1 OBJECTIVE

In order to be able to perform insurance activities, Coface lawfully processes the personal data of guarantors, suppliers, employees, clients, visitors and other real persons who establish a relation with Coface either through job application or for any other purpose or through any other channel.

The objective of this Policy is to clarify these processing activities of Coface and its related personal data systems, inform the related individuals and thus ensure transparency about personal data.

In this context, Coface explains in detail the processing of personal data under PDPL, the subjects of data processed and their rights, and the use of cookies and similar technologies in this Policy.

2 PERSONAL DATA

2.1 General Principles of Personal Data Processing

Coface processes personal data in compliance with the following principles, pursuant to the second paragraph of Article 4 of PDPL and within the framework of the objectives stipulated in the section titled **'Purposes of Processing Personal Data'** of this Policy:

- Being in conformity with the law and good faith
- Being accurate and if necessary, up to date
- Being processed for specified, explicit, and legitimate purposes
- Being relevant, limited and proportionate to the purposes for which data are processed
- Being stored only for the time designated by relevant legislation or necessitated by the purpose for which data are collected

2.2. Data Processed by Coface

Personal data are processed within Coface on the basis of explicit consent received from data subjects or in the context of activities that can be executed without being subject to explicit consent requirement under Articles 5 and 6 of PDPL, and such data are processed exclusively within the framework of the objectives stipulated in the section titled **'Purposes of Processing Personal Data'** of this Policy. Types of personal data, which vary and diversify by the type and nature of the relationship between Coface and data subject, the channels of communication used and the referred purpose of processing, and which are processed in accordance with the principles set out in this Policy, are as follows:

- Data introducing the data subject such as name, surname, profession, title, employment information, level of education, gender, marital status, information about spouse and children, citizenship status, military service completion status, criminal record, tax obligation status, among others.
- Data such as place of birth, date of birth, identification number, blood group, religion and photograph which are available on photocopies of ID cards, photocopies of birth certificates, passports, driving licenses and other identification certificates,
- Contact information including address, electronic mail address, phone and fax numbers, in addition to communication records and other audio records from phone conversations and electronic mail exchanges,
- Information about real persons on certificates of legal entities including tax certificate, trade registry gazette, authorization certificate, qualification certificates, authorized signatory list and certificate of activity,
- Detailed financial data about pricing, reconciliation, collection and payment actions.

2.3. Purposes of Processing Personal Data

Personal data can be processed by Coface in the scope of the following purposes, and such data can be stored for the purposes required for these purposes and allowed in the relevant legislation:

- Performance of the activities being undertaken by Coface within the framework of legal and administrative obligations,
- Enlightening of data subjects about amendments in legislation or changes in rules and policies adopted within Coface Sigorta,
- Investigation, identification, reporting and prevention of unlawful actions, and the management and execution of activities subject to legal process,
- Protection of legitimate interests,
- Negotiation, drafting and execution of contracts,
- Identification of current state in response to requests and queries and sending responses to related person,
- Performance of promotion and marketing activities, and receiving opinions of data subjects through survey and voting,
- Increasing efficiency by ensuring work flow and coordination among units,
- Review of the suitability of candidates for relevant positions in the processes of job application, candidate evaluation and recruitment, and contacting these candidates and persons linked to such application,
- Taking records of visits and follow up cargos,
- Ensuring the security of electronic systems and physical media belonging to or used by Coface Sigorta, and taking the required measures after conducting relevant assessments.

2.4. Personal Data Transfer

Within the framework of the objectives stipulated in the section titled '**Purposes of Processing Personal Data**' of this Policy, and pursuant to Articles 8 and 9 of PDPL, Coface transfers data within and outside the country, and personal data may be processed and stored in servers and electronic media used in this scope. The nature of these transfers and the parties with whom data are shared vary depending on the type and nature of relationship between data subject and Coface, the purpose of transfer and the relevant legal basis. These parties often include the following:

- Third persons from whom services are procured, within and outside the country,
- Direct and indirect shareholders, affiliates, subsidiaries,
- Persons and entities from whom services and/or other consulting services are procured,
- Business partners with whom contract has been signed

2.5. Personal Data Collection

Within the framework of the objectives stipulated in the section titled '**Purposes of Processing Personal Data**' of this Policy, and pursuant to Articles 5 and 6 of PDPL, Coface may directly collect personal data from employees and clients, suppliers, business partners, group companies, call centers, government agencies and other physical media, in addition to websites, mobile applications, social media and other public domains, or through training programs, events and similar activities.

2.6. Personal Data Retention Period

Coface retains personal data for the relevant legally allowed retaining times, and keeps them during the period needed to perform the relevant activities and achieve the objectives stipulated in this Policy. The personal data whose purpose of use expires and which complete the legal retaining time are deleted, discarded or anonymized by Coface in accordance with Article 7 of PDPL.

2.7. Data Subjects Rights under PDPL

Article 11 of PDPL sets out the rights of real persons whose personal data are processed and data subjects have the following rights against Coface pursuant to the relevant article:

- Learn whether or not her/his personal data have been processed,
- Request information as to processing if her/his data have been processed,
- Learn the purpose of processing of the personal data and whether data are used in accordance with their purpose,
- Learn about the third parties to whom personal data have been transferred within or outside the country,
- Request rectification in case personal data are processed incompletely or inaccurately,
- Request deletion or destruction of personal data if the purpose of processing personal data no longer exists,
- Request notification of the correction and deletion actions to third parties to whom personal data have been transferred,
- Object to occurrence of any result that is to her/his detriment by means of analysis of personal data exclusively through automated systems,
- Request compensation for the damages suffered in case the person incurs damages due to unlawful processing of personal data.

Requests to be received from data subjects to exercise any of the above listed rights, shall be fulfilled by Coface within 30 days at the latest. Such requests may be submitted in person, by showing an identification certificate, at the address of “Coface Sigorta A.Ş. Büyükdere Cad.

Yapı Kredi Plaza B Blok Kat:6 Levent 34330 İstanbul”, or may be sent to the same address by notary public or may be sent to the e-mail address (cofacesigorta@hs02.kep.tr) through secure electronic signature. If the requests require an extra cost, Coface may charge it from the requesting party based on the amounts specified in the relevant legislation.

2.8. Transfer of Personal Data Abroad

For the purposes of processing, storage, administration or any other purpose of use specified in this Policy, and to achieve the objectives defined in the section titled ‘**Purposes of Processing Personal Data**’ of this Policy, personal data may be transferred abroad in compliance with the legislation. Necessary measures will be taken to duly transfer personal data during such transfer processes.

2.9. Personal Data Security

Coface is committed to protecting the confidentiality and security of personal data. To this end, Coface takes the required technical and administrative security measures against unauthorized access, damage, loss or disclosure. In this direction, Coface applies the required system-level access controls, data access controls, secure transfer controls, business continuity controls and other necessary institutional controls.

3 COOKIES AND SIMILAR TECHNOLOGIES

3.1. General

The small data files sent to the devices of users by the internet network server through the web browser that is being used are called cookies, and web sites recognize users through these cookies. The life of cookies vary depending on the browser settings.

While these cookies are created by systems managed by Coface, some internet service providers authorized by Coface may also place similar technologies in the devices of users to acquire IP address, unique identifier and device identifier information. On the other hand, the links belonging to third parties on Coface systems are subject to the privacy policies of these third persons and Coface cannot be held liable for practices concerning privacy. In this context, when a website is visited through such a link, it is recommended to read the privacy policy of the website in question.

3.2. Types of Cookies

Cookies, which are basically intended to provide ease of use for users, are grouped under 4 main categories:

- i. **Session Cookies:** These are cookies making it possible to benefit from various features such as carrying information across websites and systemically recalling the information entered by the user. These are required so that the functions of Coface website can function properly.
- ii. **Performance Cookies:** These are cookies which collect information including the frequency of visits to the website, potential error messages, total time spent by users at the related page and patterns of use of the site. These are used to improve the performance of Coface website.
- iii. **Functional Cookies:** These are cookies intended to recall previously selected options to provide ease of use for users and are used to offer advanced internet features to users at Coface website.
- iv. **Advertisement and Third Party Cookies:** These are cookies belonging to third party suppliers and allow for using certain functions at Coface website and track advertisements.

3.3. Purposes of Use of Cookies

The purposes of use of cookies used by Coface are as follows:

- i. **Operational uses:** Coface may use cookies to manage and secure systems, to benefit from the functions at this website or to detect irregular behaviors.
- ii. **Functional uses:** Coface may use cookies that recall the users' information and past selections aimed at easing the use of systems and offer specific features for users.
- iii. **Performance-oriented uses:** Coface may use cookies which evaluate and analyze interaction with messages sent and user behaviors, aimed at improving and measuring the performance of its systems.
- iv. **Advertisement-oriented uses:** Coface may use cookies which measure the effectiveness of advertisements and similar contents and analyze their click frequencies aimed at sending such ads and similar contents to users in the light of their areas of interest through systems belonging to it or to third parties.

3.4. Deactivation of Cookies

Use of cookies is a pre-selected feature on many browsers and users may change this selection status using the browser settings menu, and thus delete existing cookies and deny further use of cookies. However, when the use of cookies is deactivated certain features in Coface systems may not be usable.

The method of changing the choice of using or not using cookies varies depending on the type of browser, and one can learn about it from the related service provider any time.

4 EFFECTIVENESS AND UPDATES

This Policy takes effect at the date it is approved by the Company's Board of Directors. Any change in the Policy shall take effect once it is approved by the Company's General Manager. The Policy shall ordinarily be reviewed and updated once a year. However, the Company reserves the right to review and update, change, annul the Policy and put in force a new Policy, as necessary, in response to change in legislation, change in a referred technical standard, potential actions and/or decisions by Personal Data Protection Board and court judgments. The power to annul the Policy shall rest with the Company's Board of Directors.