

POLICY ON PROTECTION AND PROCESSING OF PERSONAL DATA

I. Data Processor/Controller

In accordance with the The Law No. 6698 on Protection of Personal Data (“Law”), your personal data is processed by **Tim İç ve Dış Ticaret A.Ş.** (“**Tim Ticaret**”) within the scope explained below. Pursuant to Article 10 of the Law, which regulates the obligation to inform, data controllers are required to inform the relevant persons whose personal data they process on certain matters.

Within this scope, this Policy has been prepared to inform data subjects about their processed personal data, the purposes of processing, the legal grounds for processing, to whom and for what purposes the data may be transferred, and the rights of the data subject under applicable legislation.

Tim İç ve Dış Ticaret A.Ş. acts as the data controller due to the personal data processed, and its contact details are as follows:

- Tax Number: 8440031721
- Phone: 0212 867 09 44
- Address: Orta Mah. Şht. Yüzbaşı Ömerbulu Cad. Canayakın Sitesi A Blok No:7 Bayrampaşa / İstanbul
- Email: info@timticaret.com
- Website: www.timticaret.com

II. Personal Data Processed

Through the “Contact” section on our website, name-surname, address, email, phone number, call center records, IP address, other device-related data may be processed.

III. Purposes of Processing Personal Data and Legal Grounds

Your personal data mentioned above will be processed for the following purposes:

- To responding your inquiry/application
- Personalizing services
- Ensuring compliance with legislation and fulfilling contractual and legal obligations
- Conducting communication activities
- Managing contract processes
- Ensuring information security processes
- Organization and event management
- Tracking requests and complaints

Our institution collects personal data directly from the data subject, through communication channels, via the website, and through physical or electronic environments, in a limited, proportionate, and appropriate manner for the purposes stated above, and in accordance with Articles 5 and 6 of the Law, based on the following legal grounds:

- Explicitly provided for by law

- Fulfillment of legal obligations
- Data has been made public by the data subject
- Processing is necessary for the establishment or performance of a contract, provided that it is directly related to the parties of the contract
- Legitimate interest
- Explicit consent

IV. Transfer of Personal Data

Our institution processes your personal data in accordance with the principles of “need to know” and “need to use,” ensuring data minimization and taking necessary technical and administrative security measures. Since conducting and supervising business activities and ensuring business continuity require continuous data flow with various stakeholders, we may transfer your personal data to third parties for certain purposes.

Your personal data may be transferred domestically and internationally, limited to the purposes and legal grounds specified in this Policy, and only to the extent necessary for achieving those purposes, including:

- External lawyers, consultants, and service providers
- Business partners providing, operating, or supporting our IT infrastructure
- Other third parties
- Courts, public prosecutors, enforcement offices
- Judicial and administrative investigation authorities
- Other authorized public institutions and organizations

V. Conditions for Deletion, Destruction, and Anonymization of Personal Data

Tim Ticaret stores personal data collected directly from the data subject and through physical, electronic, and email channels for the retention periods stipulated under Article 7 and 17 of the Law and Article 138 of the Turkish Penal Code, and/or for the duration required by the purpose of processing.

Upon expiration of these periods, personal data will be deleted, destroyed, or anonymized in accordance with the Regulation on Deletion, Destruction or Anonymization of Personal Data and the relevant guidelines.

Tim Ticaret fulfills deletion, destruction, and anonymization processes in compliance with applicable regulations and implements necessary technical and administrative measures.

VI. Rights of the Data Subject

Pursuant to Article 11 of the Law, data subjects have the right to apply to the data controller and:

- a) Learn whether personal data is processed or not,*
- b) demand for information as to if his/her personal data have been processed,*

- c) Learn the purpose of processing and whether whether these personal data are used in compliance with the purpose,*
- ç) Know third parties to whom personal data is transferred domestically or abroad,*
- d) Request the rectification of the incomplete or inaccurate data, if any,*
- e) Request the erasure or destruction of his/her personal data under the conditions referred to in Article 7,*
- f) Request reporting of the operations carried out pursuant to sub-paragraphs (d) and (e) to third parties to whom his/her personal data have been transferred,*
- g) Object to the occurrence of a result against the person himself/herself by analyzing the data processed solely through automated systems,*
- ğ) Claim compensation for the damage arising from the unlawful processing of his/her personal data.*

You may use the [Data Subject Application Form](#) included in this Policy to exercise your rights in accordance with the Communiqué on the Principles and Procedures for Application to the Data Controller.

Requests submitted to us will be processed within legal time limits following identity verification. Responses are generally provided free of charge and will be concluded as soon as possible depending on the nature of the request. However, if the response requires additional costs, a fee may be charged within the limits set by applicable regulations.

This Policy may be updated by **Tim Ticaret** when necessary. The updated version can be accessed via our website.

[Data Subject Application Form](#)