

MAGNA LAW LEGAL & CONSULTING CLARIFICATION TEXT PURSUANT TO PERSONAL DATA PROTECTION LAW

To the extent that Magna Law Legal&Consulting (“Magna Law”) processes your personal data as the data controller, Magna Law determines the purposes and means of processing personal data and is responsible for the establishment and management of the data filing system in accordance with Law No. 6698 on the Protection of Personal Data (“**Data Protection Law**”).

The purpose of this notice is to protect fundamental rights and freedoms of persons and inform the data subjects with concerning the processing of personal data within the scope of the obligation to inform in compliance with the Constitution, international conventions in regards to human rights and relevant legislation which shall be binding upon natural or legal persons who process personal data.

Magna Law processes personal data in compliance with the law and follows ethical norms. Furthermore, it informs data subjects and relevant third parties according to the principle of transparency.

This document is prepared under the concepts and principles explained in Magna Law Legal & Consulting Personal Data Protection and Processing Policy (“**Data Protection Policy**”) and it is updated where necessary.

1. The Purpose of Processing Personal Data

Magna Law collects, processes and stores personal data from time to time as part of its usual business activities to provide full and exclusive services with complying the Data Protection Law, Attorneyship Law No. 1136 and other relevant legislation. In this regard, personal data held by Magna Law is only be processed in compliance with procedures and principles laid down in the Data Protection Law.

Magna Law complies with lawfulness, good faith, within the processing of personal data. Magna Law ensures that the data is being accurate and kept up to date where necessary, being processed for specified, explicit and legitimate purposes and being relevant, limited and proportionate to the purposes for which they are processed and is stored for the period laid down by relevant legislation or the period required for the purpose for which the personal data are processed. Magna Law categorizes data in compliance with the Data Protection Policy.

1.1. Clients, Potential Clients and Website Visitors

Magna Law processes the personal data of its clients, potential clients and website visitors pursuant to principles in this notice for the following reasons:

- To comply with legal obligations,
- To protect the rights of the data controller and data subjects,

- To enter into an agreement and fulfil its responsibilities stem from these contracts,
- To provide complementary services such as tax advice, auditing,
- To provide legal education and to inform about the same,
- To share updates regarding new legislation and recent legal news,
- To determine and to apply the business strategies of clients,
- To report the negotiations and meetings which held at Magna Law office,
- To upgrade the security precautions and to improve Magna Law website,
- To communicate with the data subject and to inform the data subject regarding services and legal updates to the extent of their permission or in case of their subscription to make notifications by communication channels,
- To reply the complaints and demands received via the website and to produce demographic information with visitors and their IP addresses,
- To provide other legal services based upon the demand of the clients or data subjects.

1.2. Employees

Magna Law processes the personal data of its employees pursuant to principles in this notice for the following reasons:

- To ensure that rights are used to comply with legislation, including labour law, social security law and lawyer law and to fulfil its obligations,
- To ensure occupational health and safety,
- To improve the policies regarding human resources and corporate governance principles,
- To ensure audit, control, security and compliance within the office
- To evaluate job applications,
- To hire new employees,
- To be able to communicate with data subject with other related communication channels in case of necessity or emergency,

1.3. Family Members

Magna Law might process personal data of its employees and clients of family members in order to communicate in case of emergency, to request relevant information for health and safety if Magna Law could not reach to the first contact at the first place. Magna Law complies with the conditions and rules that regulated by the Personal Data Protection Authority (Authority) with the Communique on Principles and Procedures to be Followed in Fulfillment of the Obligation to Inform. In this regard, the obligation to inform will be satisfied at the time of the first contact with the family members.

2. Transfer of Personal Data and Reasons to Transfer

Magna Law transfers the personal data it processes to its employees or third parties subject to confidentiality obligation in order to continue its business activities. Magna Law also transfers personal data to judiciary authorities in order to provide legal services and to

continue to its legal activities. Further to these, due to its responsibilities stems from Attorneyship Law and other relevant legislation, Magna Law transfers some of the personal data it holds to public authorities, courts or regulatory and supervisory authorities based upon demand.

Magna Law can transfer personal data to third parties with the explicit consent of the data subject or without the explicit consent of the data subject in the situations in the Article 8/2 of the Data Protection Law.

All necessary technical and administrative precautions are taken while transferring personal data to third parties.

3. The Method and Legal Basis of Collection of Personal Data

Magna Law collects the personal data via emails, phone calls, social media, instant message applications, social communication networks, registration and communication forms both orally and written in compliance with the Data Protection Law and ethical norms. The personal data provided by the data subject while registering for the services on the website is also collected over the database for the purposes listed above.

Magna Law collects personal data in order to comply with Attorneyship Law and Data Protection Law, to form a business contract in related to services which explained in this clarification text, to performs its obligations from these contracts and to protect individual and legal rights of its clients.

4. Protection of Personal Data

Magna Law takes all necessary technical and administrative precautions envisaged in Data Protection Law and secondary legislation to ensure that the personal data is accurate, stored in a secure place, erasable when necessary updatable and alterable, and preventable the misuse of the personal data.

The confidentiality obligation of Magna Law employees and third parties continue after they terminate their employment and data is only used in compliance with the Data Protection Law.

Personal data which is processed physically is stored in locked cabinets and the personal data which is processed in a virtual environment is protected with firewalls with technical support.

If Magna Law notices that any third party takes possession of personal data illegally, it shall inform the data subject and the Authority without any delay.

5. Rights of the Data Subject

Each data subject has the right to request to the data controller about him/her;

- to learn whether his/her personal data are processed or not,
- to demand information as to if his/her personal data has been processed,
- to learn the purpose of the processing of his/her personal data and whether these personal data are used in compliance with the purpose,

- to know the third parties to whom his personal data are transferred in-country or abroad,
- to request the rectification of the incomplete or inaccurate data, if any,
- to request the erasure or destruction of his/her personal data under the conditions referred to in Article 7,
- to 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,
- to object to the occurrence of a result against the person himself/herself by analyzing the data processed solely through automated systems,
- to claim compensation for the damage arising from the unlawful processing of his/her personal data.

In this regard, the data subject can use her/his right regarding the data processed by Magna Law as a data controller by applying to Magna Law in written form.

6. Exercise of the Data Subject's Rights

The data subject who wants to use or performs its rights explained in Section 5 of this document might contact Magna Law with its written request at "*Mustafa Kemal Mahallesi, Dumlupınar Blv. 266/A TepePrime Blok D:81, 06510 Çankaya/Ankara*" by hand, by post or via public notary.

Further to this, the request can be delivered via registered electronic mail (REM) to info@magnahukuk.com

The data subject must state name, surname, national ID number (for foreigners this notification must include nationality, passport number and ID number if there is so), registered address or business address, contact number and the reason of request

In case of a request to perform or use its rights pursuant to Section 5, Magna Law will respond to this request as much as possible and in a maximum of 30 days. All request will be processed free of charge. If the action requires, we reserve the right to demand extra fees charged by authorities or payments due to legislation