

Personal Data Processing and Protection Policy

Section 1. Purpose and Entry into Force of the Policy

The Personal Data Protection Law No. 6698 ("Law") entered into force on April 7, 2016. The Law sets forth the procedures and principles regarding the processing of Personal Data by natural or legal persons classified as "Data Controllers," who determine the purposes and means of processing Personal Data and are responsible for the establishment and management of the data recording system.

The protection of Personal Data is of great importance to Gold Store İkizoğulları Kuyumculuk San. ve Tic. Ltd. Şti. ("Company" or "Goldstore"). Goldstore adopts the principles prescribed by the Law No. 6698 on the Protection of Personal Data ("KVKK") to ensure compliance with the KVKK, and fulfills its obligations regarding the processing, deletion, destruction, anonymization, and transfer of Personal Data, as well as fulfilling its obligation to inform Data Subjects and ensuring data security. In this context, the Privacy and Personal Data Protection Policy ("Policy") has been prepared and made available to natural persons whose Personal Data is processed ("Data Subject").

Within the scope of the Law, Personal Data is defined as "any information relating to an identified or identifiable natural person"; processing is defined as "any operation performed upon Personal Data, such as obtaining, recording, storing, retaining, altering, re-organizing, disclosing, transferring, taking over, making available, classifying, or preventing the use thereof, either wholly or partially by automatic means or by non-automatic means provided that it forms part of a data recording system."

Among other regulations, the Law imposes an obligation to inform Data Subjects during the collection of Personal Data. According to Article 10 of the Law, Data Controllers must inform Data Subjects on the following matters:

The identity of the Data Controller and its representative, if any,
The purpose for which Personal Data will be processed,
To whom and for what purpose the processed Personal Data may be transferred,
The method and legal basis of Personal Data collection,
Other rights stipulated under Article 11 of the Law.

This Policy has been prepared in order to fulfill Goldstore's obligation to inform, in its capacity as the Data Controller, the natural persons whose Personal Data it processes pursuant to Article 10 of the Law. The scope of this Policy covers Goldstore's Customer / Members, executives, employees, employee candidates, Prospective Customer / Members, former employees, and other third parties; matters regarding the processing of Personal Data belonging to our employees are regulated under a separate policy text presented to employees in compliance with the Law.

Section 2. Scope of the Law and Our Company's Rights and Obligations Arising from the Law

I. General Principles Regarding the Processing of Personal Data

Pursuant to Article 1 of the Law, Personal Data must be processed in accordance with the procedures and principles stipulated in the Law and other relevant legislation. In this context, Data Controllers are obliged to comply with the following general principles, in addition to fulfilling the obligation to inform specified in Section 1 above:

Compliance with the law and rules of good faith.

Being accurate and, where necessary, up-to-date.

Being processed for specific, explicit, and legitimate purposes.

Being relevant, limited, and proportionate to the purposes for which they are processed.

Being retained for the period stipulated in the relevant legislation or necessary for the purpose for which they are processed.

II. Purposes of Processing and Sharing Personal Data Under the Law

a. Purposes of Processing Personal Data

As a rule under the Law, Personal Data cannot be processed without the Explicit Consent of the Data Subject. However, within the framework of Articles 5 and 6, the Law has specified certain circumstances where data may be processed without Explicit Consent for both Personal Data and special categories of Personal Data.

Pursuant to Article 5, Personal Data may be processed without the prior Explicit Consent of the Data Subject, provided that the Data Subject has been duly informed in accordance with Article 10 of the Law, under the following conditions:

It is clearly prescribed by law.

It is mandatory for the protection of life or physical integrity of the person or of another person who is unable to express their consent due to actual impossibility or whose consent is not granted legal validity.

Processing of Personal Data belonging to the parties of a contract is necessary, provided that it is directly related to the establishment or performance of said contract.

It is mandatory for the Data Controller to fulfill its legal obligation.

The Personal Data has been made public by the Data Subject themselves.

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.

On the other hand, the Law defines data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing and dress, membership to associations, foundations or trade-unions, health, sexual life, criminal conviction and security measures, as well as biometric and genetic data as "special categories of Personal Data" or "sensitive Personal Data" and has prescribed stricter conditions for their processing.

Accordingly, special categories of Personal Data may only be processed under the following conditions, unless the Explicit Consent of the Data Subject has been obtained:

Data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing and dress, membership to associations, foundations or trade-unions, criminal convictions and security measures, as well as biometric and genetic data, may be processed in cases prescribed by law.

Personal Data concerning health and sexual life may only be processed by persons subject to a confidentiality obligation or authorized institutions and organizations, for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

b. Purposes of the Transfer of Personal Data

In alignment with data processing rules, sharing Personal Data with a third party (transfer) is also subject to obtaining the Explicit Consent of the relevant Data Subject. However, according to Article 8 of the Law, data transfers may also be carried out under the conditions permitted for data processing. Accordingly, Personal Data or special categories of Personal Data may be transferred without the consent of the Data Subject in the presence of the conditions specified in Section 2.II.a above.

Regarding the transfer of Personal Data to third parties, the Law has tied international transfers to special conditions. Accordingly, Personal Data may be transferred abroad under the following conditions:

In the presence of the Explicit Consent of the Data Subject, or

In cases where the Data Subject's Explicit Consent is absent but one or more of the other conditions mentioned above are met, provided that the Data Controller in Türkiye and the Data Controller in the recipient country undertake in writing to provide adequate protection, and the approval of the Personal Data Protection Board is obtained.

III. Cases Excluded from the Scope of the Law

Pursuant to Article 28 of the Law, its provisions shall not apply in the following cases:

Processing of Personal Data by natural persons wholly within the scope of activities concerning themselves or their family members living in the same dwelling, provided that the data is not disclosed to third parties and obligations regarding data security are complied with.

Processing of Personal Data for purposes such as research, planning, and statistics by anonymizing them with official statistics.

Processing of Personal Data for artistic, historical, literary, or scientific purposes or within the scope of freedom of expression, provided that such processing does not violate national defense, national security, public safety, public order, economic security, the right to privacy, or personal rights, and does not constitute a crime.

Processing of Personal Data within the scope of preventive, protective, and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public safety, public order, or economic security.

Processing of Personal Data by judicial authorities or Execution Authorities in relation to investigation, prosecution, adjudication, or execution proceedings.

Section 3. Personal Data Processing by Our Company

I. Categorization of Personal Data Processed by Our Company

1. Customer / Member, Prospective Customer / Member

Data Category	Scope / Content Details
Identity Information	Name, surname, date of birth, gender, T.C. identity number
Location Information	City, district of residence (delivery address of the purchase made)
Contact Information	Mobile phone, e-mail address, address, postal code, landline phone
Financial Information	Tax office, invoicing details
Customer / Member Information	Membership details, membership ID number
Customer / Member Transaction Information	Purchased products, shopping amount, purchase date, call center conversation logs, Consent to receive Commercial Electronic Messages, campaigns utilized, coupons used, order details
Risk Management Information	IP address, Mac ID, etc.
Transaction Security Information	Password, login credentials
Marketing Information	Cookie records, targeting info, evaluations showing habits and interests
Visual and Audio Data	Visual and audio recordings associated with the Personal Data subject (e.g., photographs, CCTV recordings, and audio recordings), Call center conversation recordings
Physical Venue Security Information	Personal Data regarding logs taken during entry to the physical venue and during the stay inside the physical venue (e.g., entry-exit logs, visit information, CCTV recordings, etc.)
Legal Action and Compliance Information	Start and end times of the service provided, type of service utilized, amount of data transferred, Commercial Electronic Message consent given by the Data Subject in electronic media, membership agreement approved, corporate membership agreement, distance sales contract, and other legal texts and agreements enabling utilization of services provided by Goldstore.
Marketing Information	Marketing-oriented SMS, e-mail messages, or calls made by the call center based on the Commercial Electronic Message consent granted by the Data Subject
Request/Complaint Management /	Comments and/or requests submitted by the Data Subject regarding

Reputation Management Information	the product or service purchased via website, mobile application, social media accounts, or call center, and records of transactions made during the evaluation or management process of these requests
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2. Person to Whom the Purchased Product Will Be Delivered on Behalf

Data Category	Scope / Content Details
Identity Information	Name, surname, date of birth, gender, T.C. identity number
Location Information	City, district of residence (delivery address of the purchase made)
Contact Information	Mobile phone, e-mail address, address, postal code, landline phone
Financial Information	Tax office, invoicing details

II. Purposes of Processing Personal Data by Our Company

Our Company processes Personal Data within the scope specified above for the following purposes:

Processing online visitor data in accordance with relevant legislation,

Enabling shopping on these platforms under the status of a "guest" (without registration), and execution of membership processes,

Improving the services offered via the platforms, developing new services, and providing relevant notifications,

For customers with Commercial Electronic Message consent, for the purpose of executing the Membership Agreement established with the customer; analyzing Customer / Member preferences, interests, and needs, and providing customized promotions, opportunities, and benefits,

Within the scope of the contractual relationship, for customers with Commercial Electronic Message consent; introducing and marketing applications, goods/products, and services in line with the Customer / Member's preferences and interests through direct marketing, digital marketing, remarketing, targeting, profiling, and analysis,

Planning and carrying out of customer relationship management processes,

Monitoring Customer / Member requests and complaints,

Communicating with Customer / Members based on Commercial Electronic Message authorization, improving the Customer / Member experience on both the platform and the mobile application,

Creating Customer / Member satisfaction, loyalty, and commitment,

Conducting statistical evaluations and market research,

Corporate reputation management, media relations,

Determining and implementing Goldstore's commercial and business strategies,

Planning and carrying out market research activities for the sales and marketing of products and services,

Planning and carrying out marketing and sales processes of products and/or services,

Monitoring accounting and purchasing transactions,

Creating and maintaining visitor records,

Legal processes and compliance with legislation,
Answering information requests from administrative and judicial authorities,
Planning company internal reporting and business development activities,
Ensuring information and transaction security and preventing malicious use,
Planning and carrying out of operational activities necessary to ensure that Goldstore's operations are conducted in accordance with Goldstore procedures and policies prepared within the scope of the KVKK,
Making necessary arrangements to ensure that processed data is up-to-date and accurate.

III. Transfer of Personal Data by Our Company and Categorization of Parties to Whom Data Transfer is Performed

Personal Data may be transferred by our Company, for the purposes specified above, to our Company executives, affiliates, business partners, suppliers, legally authorized public institutions and organizations, and private entities.

IV. Procedure for Processing Personal Data by Our Company

Our Company, in its capacity as Data Controller and within the scope of its obligations arising from the Law, fulfills its obligation to inform Data Subjects in accordance with Article 10 of the Law before obtaining their Personal Data. If any personal data processing workflow carried out by our Company does not meet the conditions specified in the Law and detailed in Section 2.II.a and b above, the Explicit Consent of the Data Subjects is obtained, and the relevant processes are maintained within the framework of said Explicit Consent.

Under the Law, Explicit Consent is defined as "consent regarding a specific matter, based on information, and declared with free will"; accordingly, our Company obtains the Explicit Consent of Data Subjects after fulfilling its obligation to inform them in accordance with Article 10 of the Law.

Although no specific period is determined for the retention of Personal Data under the Law, it is essential, in accordance with general principles, to retain Personal Data for the period prescribed in the relevant legislation or required for the purpose for which they are processed. Our Company carries out an evaluation based on the legislation in force and the purpose of the process for each personal data processing workflow to determine matching retention periods. In line with this, our Company retains Personal Data at least for the period required by its legal obligations and in any case until the relevant statutory limitation periods expire.

Our Company anonymizes, deletes, or destroys Personal Data in accordance with the Law upon the disappearance of the processing purpose within the scope of any process, including the expiration of the aforementioned periods. Under the Law, anonymization is defined as "making Personal Data impossible to be associated with an identified or identifiable natural person under any circumstances, even by matching them with other data," and our Company's anonymization activities are carried out in compliance with the legislation in force.

V. Personal Data Security

Our Company takes reasonable technical and administrative measures to ensure the security of Personal Data, preventing unauthorized access risks, accidental data loss, deliberate deletion, or damage to data. In this context, at least the following actions are taken by our Company:

Taking appropriate software and hardware security measures suitable for the processed Personal Data,
Carrying out audits prescribed under the Law,
Ensuring compliance of the Company and its employees with the Law through in-house trainings, policies, and procedures,
Providing access to information based on the necessity principle via internal authorizations and recording such access,
Carrying out process-based tracking of personal data processing activities,
Obtaining contractual commitments regarding the protection and security of Personal Data in relations with suppliers.

Section 4. Rights of Data Subjects Arising from the Law

I. Rights of Data Subjects

According to Article 11 of the Law, Personal Data Subjects have the right to:

Learn whether Personal Data relating to them is being processed,
Request information if Personal Data relating to them has been processed,
Learn the purpose of processing Personal Data and whether they are used in accordance with their purpose,
Know the third parties to whom Personal Data is transferred domestically or abroad,
Request correction of Personal Data if it is processed incompletely or inaccurately,
Request the deletion or destruction of Personal Data in the event that the reasons requiring its processing cease to exist, despite being processed in accordance with the Law and other relevant legal provisions,
Request notification of the operations carried out as a result of correction, deletion, and destruction requests to third parties to whom Personal Data has been transferred,
Object to the occurrence of a result against themselves by analyzing the processed data exclusively through automated systems,
Demand compensation for damages in case of suffering damage due to unlawful processing of Personal Data.

Paragraph 2 of Article 28 of the Law stipulates that in certain cases, the Data Subject cannot make a claim from the Data Controller other than the compensation of damages. Accordingly, the rights specified above cannot be exercised with respect to relevant data in the following cases:

Personal Data processing is necessary for the prevention of a crime or for a criminal investigation,
Processing of Personal Data made public by the Data Subject themselves,

Personal Data processing is necessary for the execution of inspection or regulatory duties and for disciplinary investigation or prosecution by authorized public institutions and organizations and professional organizations in the nature of public institutions, based on the power granted by law, Personal Data processing is necessary for the protection of economic and financial interests of the State regarding budget, tax, and financial matters.

II. Exercise of Rights

Data Subjects may exercise the above rights by using the Application Form. Applications can be submitted along with documents verifying the identity of the Data Subject, by delivering a signed hard copy of the form by hand or through a notary public or via other methods specified in the Law to the address: Alemdar Mah. Yerebatan Cad. Salkım Söğüt Sok. No:5 Kat:1 Sultanahmet - Fatih / İSTANBUL or by sending a registered electronic mail (KEP) to goldstoreikizogullari@hs02.kep.tr signed with a secure electronic signature under the Electronic Signature Law No. 5070, or via an e-mail sent from the electronic mail address previously notified to our Company and registered in our Company's system.

Applications may also be submitted by any other method if prescribed by the Personal Data Protection Board. Data Subject requests submitted through one of the methods specified above are evaluated and answered by our Company within a maximum of thirty days. Our Company reserves the right to request additional information and documents from the applicant, especially for the purpose of verifying that the applicant is the relevant Data Subject.

As a rule, Data Subject applications are evaluated by our Company free of charge. However, if a fee has been determined for the request of the Data Subject by the Personal Data Protection Board, our Company shall have the right to demand payment based on this fee.