

ANTALYUM PREMIUM MALL MAN. CON. TRADE. LTD. CO. PRIVACY STATEMENT-INFORMATION TEXT

Introduction

As Antalium Premium Mall Man. Con. Trade Ltd. Co. (Antalium Premium Mall), we process your personal data when you visit our website and use our applications, our offering of products or services directly to you or through organizations, visit our shopping center and/or participate in our organizations or campaigns. We care about protecting your personal data and we process your personal data following applicable laws and obligations in force.

In this Privacy Statement, we would like to inform you about our identity as the data officer, how and for what purpose we process your personal data, how to exercise your rights to your personal data, and other matters that may assist you.

As Antalyum AVM, we take care to ensure that the necessary information is clearly and easily readable and understandable. However, if you have any questions regarding the processing of your personal data or your personal data after you have been informed by this Privacy Statement, you can always contact us from the contact details given below.

We are constantly improving our products and services, which may change our terms of processing your personal data. As Antalyum AVM, we will reflect these changes in our Privacy Statement. We hereby advise you to regularly follow the Privacy Statement for current changes. Antalyum AVM uses cookies and similar technologies. You can read our Cookie Statement for detailed information about our use of cookies.

2. Who are we?

Kemerağzı Mah.Tesisler Cad. Antalyum AVM No:349 Aksu Antalya Located at Turkey Antalyum AVM Yön.İnş.Tic. Ltd.Şti www.antaliumavm.com / www.antaliumshopping.com / is a retail asset management, property management and (re) development company. For more information, please see nasıl How can you learn more?" Read paragraph.

3. What personal data does the Privacy Statement apply to?

Personal data processed, stored, transferred or otherwise used within the scope of Antalyum Shopping Center website, applications, shopping mall, products and services are included in this Privacy Statement. The personal data of our investors, candidate employees, business partners, tenants, our customers, suppliers, visitors, and other real persons, including but not limited to the personal data, are evaluated within this scope.

4. What is personal data?

Personal data refers to any information relating to an identifiable or identifiable natural person. Together, the different information that makes any real person identifiable is also considered personal data.

Being a customer, offering products or services, visiting our shopping center or contacting us in any way, you share personal data with Antalyum AVM.

5. What personal data do we process?

If you contact Antalium AVM, we can process your personal data in the following categories:

- **Demographic data** (name, gender, date of birth, age, nationality, marital status and family profile)
- **Contact information** (name, work, address, residence address, e-mail address, telephone number)
- **Application data** (CV and motivation letter)
- **Financial data** (bank account information, credit reference number, credit card number)
- **Company information** (address, registration number, tax number)
- **Account information** (username and password)
- **Marketing preferences** (whether you opt in or opt out for direct marketing)
- **Interaction details** (communication with our customer service or digital and / or written correspondence)
- (online) identifier, data surfing data and visitor movements data (IP address, cookies, MAC address, browsing movements, shopping habits and location through our website and applications)
- **Participation details** (your participation in promotions, loyalty programs, surveys, contests or social and marketing events)
- **Data required to ensure security and prevent fraud** (official identity, camera recordings)
- **Image data** (photos, video images)

6. How do we collect, acquire or create your personal data?

We collect and process your personal data in the above categories directly from you, from other sources or through profiling or automatic decision-making techniques, and process it as permitted by law.

Your personal data you provide to us

The following data is provided directly to you by Antalyum AVM:

- your personal data you share with us during your account creation, use of our applications, contract conclusion, promotion, loyalty programs or participation in social and marketing organizations and / or any other information you provide during your use of the call center or Antalyum AVM's products and services;
- your surfing data and your shopping habits during your participation in loyalty programs;
- your personal data you shared during your visit to our mall (including movement information generated by Wifi monitoring);
- your personal data provided by you or the organization that has made us known to you during the supply of our products and services; and
- your personal data provided by correspondence, recruitment, feedback, support (question and answer) and conflict resolution.

Personal data from other sources

To the extent permitted by applicable law, we may obtain (additional) personal data through services provided by other sources or from other sources, such as social media, websites.

In this context, requirements such as the explicit consent of the law are envisaged. We collect personal data from the following sources:

- data from organizations that we provide products and services;
- the data of the company and its representatives registered on the Trade Registry and the Land Registry;
- data from public sources, such as status inquiry agencies (companies specializing in credit profiles), bankruptcy register (information on bankruptcies and legal debt adjustment

- procedures), sanction lists, lists of Political Influence (= PEP) lists, newspapers, internet or social media (Facebook, Instagram, YouTube, Google+ and Twitter); and
- data collected from (other) companies you allow to collect and sell information about you.

Profiling techniques / automatic decision making

As Antalyum AVM, we may want to approach you with a more personal and special perspective. In order to make this possible and to identify the most relevant target groups, segments, content, ads, information, moments and channels, we can analyze personal data. In this context, we use profiling and automatic decision making techniques only with your express consent and share with you the relevant logic and the results of the technical results. We also take all necessary measures to protect your rights and ensure that the relevant techniques do not affect you legally and significantly.

If you do not agree to the use of profiles in order to provide you with personalized marketing, below is "how can you get more information? you can contact us in the contact details mentioned in the paragraph titled".

7. For what purposes do we process your personal data?

We collect and process your personal data for the following purposes:

1. conclusion of a contract: in order to conclude and fulfill the requirements of the contract with you and our other customers, tenants, suppliers or (business) partners;
2. for the purpose of communication, (direct) marketing and personalization: to communicate, promote and provide information on the activities of Antalyum AVM's products and services or other organizations (marketing);
3. Quality and management purpose: in order to observe and improve our products and services;
4. back office activities: for billing and collection management purposes;
5. Security: For security reasons, accidents, insurance claims etc.; and
6. legislation: for compliance with legislation (eg verification requirements) or court decisions relating to the Antalya Mall.

In more detail, we process your personal data for the following purposes.

The conclusion of a contract

We process your personal data for the purposes of preparing, enacting or terminating (as far as practicable) various agreements, including lease agreement, shopping mall management agreement, purchase and sale agreements. In this context, we can request data from you such as demographic data, contact details, company details and financial details.

For the purpose of communication, (direct) marketing and personalization

- Customer Relationship Management - Your relationship with Antalyum Shopping Mall is important for us. In this context, we take utmost care to ensure that your personal data processed by us is accurate and up-to-date. Customer relationship management includes the preparation of the relevant contracts and the creation of your account as the customer of Antalyum AVM, the sharing of your contact information for the preparation of business proposals and the sending of invoices to the correct customer. In this context, we collect demographic data, contact details and company information.
- Customer service and support - We would like to assist you as soon as possible when you contact us for support or if you have any additional requests or complaints. Within this scope, we process your personal data within the scope of the notes we receive upon your request, keeping the report records and telephone conversations with our employees. We

use this information to both facilitate the resolution of your problems and to analyze and improve our service quality. In this context, we collect demographic data, contact details, company information, financial details and your requests and complaints.

- **Marketing and promotional offers** - If you are already an Antalyum AVM customer or have indicated that you would like to receive information about Antalyum AVM products and services or other operations, we may include you in an e-mail list of bulletins, brochures and other information. Within this scope, we collect demographic data, contact details and company information in order to submit (personalized) offers.
- **Participation in the loyalty program** - As a visitor to our shopping center, we may also process your personal data if you indicate that you wish to participate in loyalty programs to receive personalized offers and provide feedback through customer satisfaction and / or surveys. For this purpose, we collect demographic data, contact details, financial details, account information and participation details.

For quality and management purposes

We are able to process your personal data in order to control and improve the quality of our products and services, processes and systems, to inform management within this scope and to perform internal audits. For example, as Antalyum AVM, we can use Wifi monitoring to monitor the movement and flow of a visitor within the shopping center and to evaluate the performance of certain shopping centers. For this purpose, we can collect interaction details, surfing data and visitor movements data.

Back office activities

We may process your personal information in order to manage our relationships with you and to meet the requirements under the relevant contract. For example, reminders can be sent to customers who are the recipients of the unpaid invoice, and personal data such as demographic data, contact details, company information, financial data and account information can be processed.

Security

We can process personal data to ensure the safety of our visitors and to prevent and detect crime. For this purpose, during your visit to our shopping center Closed Circuit Television (TV CCTV ") can be used in accordance with the relevant legislation. CCTV is used in a well designed and selective way and we, as Antalyum AVM, take into consideration the necessary precautions and restrictions to minimize the impact on your privacy rights. During CCTV use, you are informed in certain ways.

Legislation

Confirmation of whether we can accept your personal data as a third party customer or business partner of Antalyum AVM, to prevent possible fraud, to conduct audits, to comply with legislation (eg civil law, criminal law, administrative law, tax law) and regulations. in order to take the necessary legal actions in order to use our rights.

8. For what legal reasons do we process your personal data?

In order to comply with the law, personal data (detailed above) processed for specific purposes must be based on legal reasons¹. Antalyum AVM processes personal data for the following legal reasons:

¹ Legal reasons are contained in Article 6 of the EU General Data Protection Regulation. ("GDPR").

(1) Execution of a (service) contract

We are able to process your personal data provided that it is necessary for the performance of the contract we have concluded with you. This data is processed in order to fulfill our obligations as a party to the contract.

(2) Fulfillment of our legal obligation or explicitly stipulated by law

We are able to process your personal data in order to fulfill our legal obligations or if expressly provided by law.

(3) Our legitimate interests

Without prejudice to your fundamental rights and freedoms, we may process personal data within our legitimate interests, for example:

- In order to improve service quality and impact;
- to protect the interests of visitors and stakeholders;
- to detect fraud and security breaches (eg possible fraud and security breaches that may occur at our websites and shopping centers);
- to defend ourselves in legal processes;
- for regulatory compliance.

(4) Your express consent

If the above legal reasons do not apply, we are only able to process personal data with your express consent. We would like to point out that you can always withdraw your consent if you give your express consent and do not have a retroactive effect.

As Antalyum AVM, we process your personal data for the purposes mentioned above and for the legal reasons detailed below:

Purpose of processing

Signing of a contract: to conclude agreement with you and our other customers, tenants, suppliers or (business) partners and to fulfill the requirements of the contract. (1) The performance of a contract,

For the purpose of communication, (direct) marketing and personalization: to communicate, promote and provide information about the products and services of Multi or the activities of other entities (marketing). (1) The performance of a contract,

For quality and management purposes: to observe and improve our products and services. (3) Our legitimate interests,

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For the purpose of communication, (direct) marketing and personalization: to communicate, promote and provide information about the products and services of Multi or the activities of other entities (marketing). (1) The performance of a contract,

For quality and management purposes: to observe and improve our products and services. (3) Our legitimate interests,

Back office activities: for billing and collection management purposes.

(1) The performance of a contract,
(2) Fulfillment of our legal obligation or ex
in laws,
(3) Our legitimate interests.

Security: For safety reasons, accidents, insurance claims and so on. (3) Our legitimate interests.

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Legislation: for regulatory purposes (eg verification requirements) or multi-court decisions. (2) Fulfillment of our legal obligation or explicitly stipulated in laws,

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9. Who do we pass your personal data to?

We may transfer your personal data to third parties under this Privacy Statement and to the extent permitted by applicable law. Your personal data can be transferred to recipient groups in the following categories.

Group companies

We provide you with information and / or services (such as registration and customer support), the establishment of new web sites, applications, promotions and communications and possible illegal activities, violations of our policies, fraud and / or data security violations to prevent, monitor and review your personal data We are able to transfer to other group companies of Antalyum AVM.

We can transfer your personal data to supervisory bodies such as the Tax and Customs Administration, the Police Department and other legal authorities. We may transfer your personal data for the following purposes:

- comply with legal obligations, court orders or laws; or
- is necessary for the prevention, prosecution or prosecution of a crime; or
- is necessary to implement our internal policies or to protect the rights and freedoms of others.

Trading companies (data processors)

We receive support from commercial service companies in the conduct of our activities. These companies only act in accordance with the instructions given by Antalyum AVM and are committed not to use your personal data for their own purposes.

Other

Third parties to whom we transfer your personal data at your consent (for example, under cooperation, duty or (service) contract) and / or other companies that may become part of the current or future restructuring, merger or acquisition.

10. Do we transfer your personal data abroad?

We are able to transfer your personal data abroad. In this context, we take all necessary measures to ensure that the transfer is safe and within the limits established by law.

To ensure adequate protection, we only transfer your personal data abroad if:

Decision to ensure adequate protection

We are only able to transfer your personal data abroad if there is a karar decision that there is sufficient protection in the foreign country where the personal data will be transferred. The decision to ensure adequate protection can be taken by the European Commission or the Turkish Personal Data Protection Agency.

Commitment set by EU-US Privacy Shield or Turkish Personal Data Protection Agency

We may transfer your personal data only if the buyer or the data processor in the foreign country to whom the personal data is to be transferred under the EU-US Privacy Shield or under the commitment of the minimum elements set by the Turkish Personal Data Protection Agency, has sufficient protection.

Standard contract clauses and audit

The transfer of your personal data abroad (in accordance with the law) is only possible by us and by the receiving groups or by the processors who provide the appropriate protection. We provide these protection measures through the governance rules of Antalyum AVM and our standard data protection provisions that we agree with all parties that process data on behalf of Antalyum AVM.

11. What is the time we process your personal data?

Your personal data will be processed as long as the purpose of processing does not disappear or in accordance with the periods stipulated in the applicable legislation, after which it will be deleted or anonymized.

12. How can you exercise your rights to your personal data?

You have the right to apply to us regarding your personal data:

- find out if your personal data is processed,
- if your personal data has been processed, request information about it and request to review your personal data,
- learn the purpose of processing your personal data and whether it is used for its purpose
- request that your personal data be corrected and / or deleted or destroyed,
- know the third parties to whom your personal data is transferred,
- request that any of your personal data be corrected, deleted, or destroyed, to be notified to the third parties to whom such personal data is transmitted,
- request that your personal data processing be stopped;
- object to the processing of your personal data,
- Handling of your personal data (= data portability) want (not applicable to data subjects residing in Turkey).

Your request for your rights as set out above will be "How can you learn more?" "How can you complain?" with the following methods:

Please note that we may request additional information from you to confirm your identity.

If you do not want us to contact you for direct marketing purposes, we will ask you "How can you learn more?" You can forward our contact details.

More information on how to object to profiling can be found in the paragraph on profiling techniques above.

13. How can you complain?

You can send us your claim regarding your rights mentioned above through the following channels:

- secure electronic signed or mobile signed
- by e-mail to our e-mail address that you have previously notified us of and registered in our system, or
- "How can you learn more?" or by a notary public with a wet signed petition.

On the other hand, you may also complain to the Personal Data Protection Board (for example, if you decide that we do not use your personal data carefully or request us to access or make changes to your personal data and we are not satisfied with our response or respond within a reasonable time).

14. How can I learn more?

You may contact us if you have any further questions regarding our personal data processing activities that are not regulated in this Privacy Statement and you wish to exercise your rights or make any complaints in this respect:

Antalyum AVM Yön.İnş.Tic. Ltd.Şti
Kemerağzı Mah.Tesisler Cad. Antalyum AVM No:349 Aksu Antalya Türkiye
www.antaliumavm.com www.antaliumshopping.com

15. When was the last amendment to this Privacy Statement?

This Privacy Statement will be applied as of 12/06/2019. The latest amendment to the Privacy Statement was made on 12/06/2019.