

# Information Text Regarding Personal Data Processed Through Contact and Information Request Forms

## Data Controller and Contact

PİYALEPAŞA GAYRİMENKUL GELİŞTİRME YATIRIMI ve TİCARET A.Ş. (the “Company” or “POLAT”), a group company of Polat Holding A.Ş., is the Data Controller. **Registered Address:** İstiklal Mah. Piyalepaşa Bulvarı BLV. No:24 İç Kapı No:5 Beyoğlu/İstanbul. **Contact:** infokvkk@polat.com | | Website: www.piyalepasa.com.tr

## Processed Personal Data and Sources

Identity and contact data: name-surname, mobile phone number, e-mail address; and message content you voluntarily provide through contact / information request forms on www.polat.com. These personal data are obtained directly from you via online forms and communication channels (including İYS).

## Purposes of Processing

- Informing you about housing projects and other products/services of group companies, affiliates and undertakings within the Polat Group of Companies, as well as business and project partners with whom we act jointly, including cases where a joint decision-making mechanism exists regarding data processing activities.
- Planning and carrying out marketing, campaign, promotion, advertising and communication activities in relation to activities carried out together with our business partner that may also qualify as a Joint Data Controller due to the above-mentioned relationship, namely Atlas Portföy Yönetimi A.Ş. (**Tax ID:** 1020424728; **Address:** Esentepe Mah., Haberler Sok., Aynus Holding, Blok No:10, İç Kapı No:3, Şişli-İstanbul).
- Sending commercial electronic messages via the channels of POLAT and ATLAS PORTFÖY, and contacting you by other means in accordance with Law No. 6563 and the Regulation on Commercial Communication and Commercial Electronic Messages, in order to improve service quality and inform you of opportunities and updates in real estate marketing and sales processes.
- Carrying out fund participation processes (application, participation, unit subscription/redemption transactions) for ATLAS PORTFÖY YÖNETİMİ A.Ş. POLAT BİRİNCİ PROJE GAYRİMENKUL YATIRIM FONU.
- Fulfilling legal obligations before the Capital Markets Board (SPK) and other regulatory authorities.

- Providing information relating to fund activities (reporting, investor information documents) and ensuring secure and orderly communication with investors through electronic communication channels.

- Ensuring transaction security (fraud prevention, identity verification) in connection with fund operations.

### **Legal Bases of Processing**

- KVKK Article 5/2(f): Processing is necessary for the legitimate interests of the data controller, provided that such processing does not harm the fundamental rights and freedoms of the data subject.

- KVKK Article 5/1 (Explicit Consent): Applicable to personal data processing activities carried out for the sending of commercial electronic messages and certain marketing communications.

### **Transfers and Recipients**

Limited to the purposes described above and in compliance with personal data protection legislation and transfer set rules, your personal data may be transferred to:

- POLAT's shareholders and companies in which shareholders hold the majority of shares and/or have management control;

- Legal entities with whom we share a common economic activity or a joint decision-making mechanism regarding data processing (including joint controllership situations);

- Public institutions and organizations vested with statutory powers;

- Group and related entities, including:

- **Polat Yönetim Danışmanlık Hizmetleri A.Ş.** (*Polat Management Consultancy Services Joint Stock Company – JSC*)
- **POLAT KENTSEL GAYRİMENKUL GELİŞTİRME A.Ş.** (*POLAT Urban Real Estate Development Joint Stock Company – JSC*)
- **Piyalepaşa Yönetim Danışmanlık A.Ş.** (*Piyalepaşa Management Consultancy Joint Stock Company – JSC*)
- **PİYALEPAŞA GAYRİMENKUL GELİŞTİRME YATIRIMI ve TİCARET A.Ş.** (*Piyalepaşa Real Estate Development Investment and Trade Joint Stock Company – JSC*)
- **POLAT HOLDİNG A.Ş.** (*POLAT Holding Joint Stock Company – JSC*)
- **PD Real Estate Development Kft** (*PD Real Estate Development Limited Liability Company – Kft*)
- **APD Real Estate Kft** (*APD Real Estate Limited Liability Company – Kft*)
- **Pearl Real Estate Development Kft.** (*Pearl Real Estate Development Limited Liability Company – Kft*)

- **ATLAS PORTFÖY YÖNETİMİ A.Ş.** (*Atlas Portfolio Management Joint Stock Company – JSC*)
- **ATLAS PORTFÖY YÖNETİMİ A.Ş. POLAT BİRİNCİ PROJE GAYRİMENKUL YATIRIM FONU**  
(*Atlas Portfolio Management JSC – Polat First Project Real Estate Investment Fund*)

### **Method of Processing and Retention**

Your personal data are processed by automated and non-automated means (e.g., web forms, CRM/İYS systems, secure e-mail) and retained for periods required by relevant legislation, statutory limitation periods, and legitimate interests (e.g., defense of legal claims), after which they are deleted, destroyed or anonymized pursuant to KVKK and the relevant regulation.

### **Your Rights Under KVKK Article 11**

You may apply to POLAT to:

- learn whether your personal data are processed;
- request information regarding processing;
- learn the purpose of processing and whether your data are used in line with such purpose;
- know the domestic and/or international recipients;
- request correction of incomplete/incorrect data;
- request deletion or destruction under Article 7 of the KVKK;
- request notification of actions taken to third parties;
- object to results arising to your detriment by means of analysis exclusively through automated systems; and
- request compensation for damages due to unlawful processing.

### **Application Procedure**

You can submit your requests by preparing a written application in accordance with the Communiqué on the Principles and Procedures of Application to the Data Controller and delivering it by hand (wet signature) or via notary public/registered mail to İstiklal Mah. Piyalepaşa Bulvarı BLV. No:24 İç Kapı No:5 Beyoğlu/İstanbul; or by electronically signing your application (mobile signature or secure electronic signature) and sending it via your KEP address or from your e-mail address already registered in the Company's data recording system to infokvkk@polat.com

If POLAT responds in writing, no fee will be charged for up to ten (10) pages; TRY 1 may be charged for each additional page. If the response is provided on a recording medium such as CD or flash memory, the fee shall not exceed the cost of the recording medium.

## **Mandatory Elements of the Application**

Applications must include: name-surname, signature, Turkish ID number (if applicable), residence or workplace address, e-mail address, telephone and fax number, and the subject matter of the request. If acting on behalf of someone else, a notarized special power of attorney must be enclosed. Requests must be clear, comprehensible and related to your person. Applications missing mandatory elements may be rejected pursuant to the Communiqué.