

PERSONAL DATA PROTECTION POLICY

As CWR, we attach importance to the protection of the personal data of our valued customers and we invite you to visit our

We would like to inform you within the scope of the Law on the Protection of Personal Data (“KVKK”).

What is Personal Data?

Within the scope of KVKK, personal data is any information relating to an identified or identifiable natural person (“Personal Data”) and Sensitive Personal Data, which is a special type of Personal Data, includes race, ethnic origin, political opinion, philosophical beliefs, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data, data (“Special Categories of Personal Data”).

Your Personal Data within the scope of this Clarification Text The explanations made for your Personal Data of Special Nature also cover your Personal Data of Special Nature.

What Methods and Legal Reasons Do We Collect Your Personal Data?

In all Personal Data processing activities we carry out, in the relevant legislation, especially KVKK act in accordance with all obligations and principles required and ensure that your Personal Data is kept securely

We take the necessary security measures for processing.

Which Personal Data Do We Process?

The following examples can be given to your Personal Data that we process: Personal Data You Provide to Us: Name and surname date of birth, Turkish ID number, telephone number, e-mail address, address, surveys and contests photographs, video recordings transmitted within the scope of the above-mentioned channels in any way any other Personal Data you share with us. Personal Data Collected Automatically Other Information Including: Automatic dialing machines, video and audio recording devices, through Cookies or is your Personal Data collected automatically by other means. Personal Data Received from Other Sources Other Information Including: social media tools, our business partners, suppliers and other third parties updated delivery and address information shared with us based on your prior consent; account information, purchase, page view information; information such as search terms and search results, is your Personal Data, such as paid listings (such as Sponsored Links).



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For Which Purposes Do We Process Your Personal Data?

As a rule, we process your Personal Data based on your explicit consent. However, as permitted under the KVKK In exceptional cases, your Personal Data may be processed without your explicit consent (Art. 5.2 and Art.6.3). In this context (i) in order to fulfill our legal obligations, (ii) due to actual impossibility you are unable to disclose your consent (iii) any orders or purchases ordered or purchased through the Websites providing you with the products and services received, contacting you when necessary in this context, CWR Ability to buy and sell in their stores, use of POS, return transactions, transportation services, Establishment of a distance sales contract within the scope of electronic commerce, sale or supply of products or services, delivery, receiving your questions and complaints, responding to you, if necessary, in case of a possible dispute the conclusion or performance of a contract, such as their use, or the fulfillment of our legal obligations (iv) harm your fundamental rights and freedoms in order to bring about or to establish or protect a right cost reduction, efficient use of resources, call center service quality to protect our legitimate interests, such as monitoring;

We process your Personal Data. Also through contests you participate in and Social Media channels your Personal Data that you have made public, also without seeking your consent again, within the scope of KVKK to the given extent. Your explicit consent to your Personal Data collected through the above-mentioned channels, again with the above-mentioned methods (Art. 5.1 and Art. 6.2 of the LPPD): (i) internet advertising, Targeting, re-targeting (=targeting and retargeting), cross-selling, campaign, opportunity and product/service advertisements. processing for the purpose of presenting opportunities for services, using Cookies for this purpose, collecting your preferences and making commercial offers taking into account your recent purchases (ii) making commercial offers on our Websites to determine how you became aware of it, non-anonymized traffic statistics via unique user registration create, make your visit to the Websites more enjoyable and improve the use of the Websites and to increase its functionality, to get to know you during your visit to the Websites and to meet your expectations and interests processing for the purpose of providing content tailored to your fields and personalized browsing, the use of Cookies for this purpose also allows you to access your previous records during your visit to the CWR Stores tracking your usage habits and offering customized Products (iii) sales and marketing activities, especially customized advertisements, campaigns, advantages and other benefits to be made for you and to carry out other marketing and CRM (Customer Relationship Management) activities (iv) processing, use of cookies for this purpose (iv) for the purpose of creating new product and service models processing, use of cookies for this purpose (v) electronic commercial messages (campaign, newsletter, customer such as satisfaction surveys, product and service advertisements) (vi) gifts and promotions and other (vii) organizing corporate communication and other events and invitations in this context and may be processed for the purpose of informing about them. Also Special Categories of Personal Your consent is also obtained by obtaining your explicit consent for the purposes specified in Article 5.2 of the KVKK and from (i) herein It may be processed for the purposes specified up to (vii). In this context, your explicit consent to each of the types of processing that require your explicit consent in this Clarification Text support us to serve you better by giving this consent in the requested documents and fields you can be.

What is the Processing Period of Your Personal Data?

Your Personal Data shall be protected in accordance with the legislation on the protection of Personal Data, in particular the KVKK and other the above legitimate purposes are in any case eliminated in accordance with the deadlines mandated by the legislation as long as it is not removed.



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Transferring Your Personal Data to Third Parties and/or Abroad Your Personal Data

may only be processed domestically in the presence of processing purposes that do not require your explicit consent above and abroad, especially in the EU countries, the USA, the UK, OECD countries, India, China and Russia storage, archiving, information technology support (server, hosting, program, cloud computing), third parties from whom we receive support in areas such as security, call center, cooperation and/or service Group Companies, business partners, suppliers, banks, financial institutions, law, tax, etc. consulting firms from which support is received in the fields and other related companies where transfer is necessary for the purposes identified parties and authorized institutions and organizations. Other than this, only with your explicit consent, domestically and in the above-mentioned countries. Group Companies, which provide marketing and sales support, based on your explicit consent specified above data may be transferred to third parties who may process the data based on your explicit consent. We also need your explicit consent in respect of any part or assets of CWR (including, but not limited to, trademarks, domain names and other commercial business elements (including but not limited to) to the transferee natural or legal persons in the event of a sale of your Personal Data, third parties in Turkey and abroad, including their stakeholders, business partners, intermediaries, consultants may be transferred to third parties to the extent required by the transfer, and during the transaction process, these third parties may transfer the necessary limited to making the assessment, and in the event of a transfer, the transferee may process the assets together with the continue to process your Personal Data, which are the values attached to these assets, with itself as the data controller can.

Your Rights arising from KVKK for Your Personal Data and Our Support as Data Controller

By applying to CWR in accordance with Article 11 of the LPPD;

- Learn whether your personal data is being processed,
- Request information if your personal data has been processed,
- The purpose of processing your personal data and whether they are used for their intended purpose learning,
- To know the third parties to whom your Personal Data is transferred domestically or abroad,
- To request correction of your personal data in case of incomplete or incorrect processing,
- Your Personal Data to be evaluated within the principles of purpose, duration and legitimacy to request its deletion or destruction in case the reasons requiring its processing disappear,
- In case of correction, deletion or destruction of your personal data, these transactions will be carried out by the Personal Data Protection Unit of the Personal Data to be notified to third parties to whom it is transferred,
- In case your processed Personal Data is analyzed exclusively through automated systems do not challenge a result if it is unfavorable to you,
- In the event that your personal data is processed unlawfully and you suffer damage for this reason, the damage you have the right to demand redress.



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