

ATAKULE GAYRİMENKUL YATIRIM ORTAKLIĞI A.Ş. WEBSITE COOKIES CLARIFICATION TEXT

1. AIM

As Atakule Gayrimenkul Yatırım Ortaklığı A.Ş. (“Company”), we make use of certain technologies (“Cookies”), such as cookies, pixels, gifs, to improve your experience during your visits to our online channels. The use of these technologies is carried out in accordance with the legislation we are subject to, especially the Law on the Protection of Personal Data No. 6698 (“KVK Law”).

The purpose of this Clarification Text is to inform you about the processing of personal data obtained during the use of cookies by Site users/members/visitors (“Data Owner”) during the operation of the Company website (“Site”) operated by us. In this Clarification Text, we would like to explain to you what type of cookies we use for what purposes and how you can control these cookies.

As a company, we can stop using the cookies we use on our Site, change their types or functions, or add new cookies to our Site. Therefore, we reserve the right to change the provisions of this Clarification Text at any time. Any changes made on the Current Clarification Text will become effective after being published on the Site or in any public media. You can find the last update date at the beginning of this Clarification Text.

You can find detailed information on the processing of your personal data in the "Information Text on the Protection and Processing of Personal Data" located at <https://www.atakule.com.tr>.

2. COOKIE CATEGORIES

Below you can find the different types of cookies we use on our Site. Our site uses both first-party cookies (placed by the Site you visit) and third-party cookies (placed by servers other than the Site you visit).

2.1. Mandatory Cookies

The use of certain cookies is essential for the correct operation of our Site. For example, authentication cookies, which are activated when you log in to our Site, ensure that your active session continues when you switch from one page to another on our Site.

COOKIE	DESCRIPTION
_ utma	Used to distinguish between users and sessions. The cookie is created when the javascript library is executed and there is no __utma cookie available. The cookie is updated each time data is sent to Google Analytics.
session	A cookie that is deleted when the user closes the Web browser. The session cookie is stored in temporary memory and is not stored after the browser is closed. Session cookies do not collect information from the user

2.2. Functionality and Preference Cookies

These cookies allow you to customize the services offered on our Site by remembering your preferences and choices on the Site. For example, they allow us to remember your language selection on our Site or the font size you have chosen when reading a text.

COOKIE	DESCRIPTION
IP_JAR	Set by Google. This group sets a unique ID to remember your preferences and other information such as website statistics and track conversion rates. My Google's policies can be viewed at https://policies.google.com/technologies/types .
ga	Used to distinguish between users.
gid	Used to distinguish between users.
eu-law	The cookie that collects KVKK approvals.

2.3. Targeting or Advertising Cookies

We use cookies to promote products and services to you on our Site or in channels other than our Site. In addition, we may cooperate with some of our business partners to advertise and promote you within or outside of our Site. For example, cookies can be used to track whether you clicked on an ad you saw on our site, and if you benefited from the service on the site to which the ad was directed after the ad caught your attention.

COOKIE	DESCRIPTION
gat_gtag_UA_36403011_1	Used to analyze the visitor's browsing habits, flow, source and other information.

3. CONDITIONS FOR THE PROCESSING OF THE PERSONAL DATA

The explicit consent of the data subject is only one of the legal grounds that enables the processing of personal data in accordance with the law, and in the presence of one of the conditions listed below, personal data is processed by our Company without seeking the explicit consent of the person concerned.

Except for express consent, the basis of the personal data processing activity may be only one of the conditions stated below, or several conditions may be the basis of the same personal data processing activity.

3.1. Expressly Stipulated in the Laws

Personal data may be processed even without the consent of the person concerned, if it is expressly stipulated in the KVK Law and related legislation as well as in other laws and regulations. The Company shall be able to process personal data, even if there is no explicit consent, if stipulated in the Laws.

3.2. It is strictly required for the protection of the life or physical body integrity of the person, or someone else, who may not disclose his consent due to actual impossibility or whose consent is not accepted as valid and applicable,

The personal data of the relevant person can be processed if the processing of the personal data is compulsory for protecting the life or physical body integrity of the person who cannot disclose his consent due to the physical impossibility or whose consent is not accepted as valid and applicable or any other person.

3.3. Direct Relation with the Establishment or Performance of the Contract

Provided that it is directly related to the conclusion or performance of a contract to which the relevant person is a party, this condition may be deemed to be fulfilled if the processing of personal data is necessary.

3.4. Fulfillment of the Legal Obligation by the Company

The personal data of the data owner can be processed if the processing is compulsory for the fulfillment of its legal obligations by our Company.

3.5. Publicization of the Personal Data by the Relevant Person

If the personal data of the person concerned has been made public, the relevant personal data may be processed for the purpose of making it public.

3.6. Compulsory Data Processing for the Establishment or Protection of any right

If the data processing is compulsory for the establishment, use or protection of any right, the personal data of the data owner can be processed.

3.7. Compulsory Data Processing for the Legitimate Interest of our Company

If the data processing is compulsory for the legitimate interests of our Company, provided that it will not cause damage to the fundamental rights and freedoms of the personal data owner, the personal data of the data owner can be processed.

4. PROCESSING OF PERSONAL DATA OF SPECIAL QUALITY

The law attached special importance to personal data that is sensitive within the scope of the law due to the risk of causing victimization or discrimination when unlawfully processed. These special quality personal data are the ones related to race, ethnic origin, political thought, philosophical belief, religion, communion or other believes, appearance, association, foundation or union membership, health, sexual life, imprisonment or security measures and the biometric and genetic data.

Special quality personal data is processed by our Company in accordance with the principles set forth in this text, by taking all necessary administrative and technical measures, including the methods to be determined by the Board, and in the presence of the following conditions:

(i) Special categories of personal data **other than health and sexual life** may be processed without the explicit consent of the person concerned, provided that it is expressly stipulated in the law, in other words, there is a clear provision in the relevant law regarding the processing of personal data. Otherwise, the explicit consent of the person concerned will be obtained.

(ii) The **special quality personal data regarding the health and sexual life**, however, shall be able to be processed by authorized institutions and organizations under the confidentiality obligation or without the explicit consent of the relevant person only for the purpose of protecting the public health, executing the preventive medicine, medical diagnosis, treatment and care services and planning and managing the health services and their finance. Otherwise, the explicit consent of the person concerned will be obtained.

5. PURPOSES OF USE OF COOKIES

We, as a company, use cookies for various purposes on our Site and process your personal data through these cookies. These purposes are mainly:

- **To perform the basic functions necessary for the operation of the Site.**
- **To analyze the Site and to improve the performance of the Site.** For example, the integration of different servers on which the Site works, determining the number of visitors to the Site and adjusting performance accordingly, or making it easier for visitors to find what they are looking for.
- **To increase the functionality of the Site and to provide ease of use.** For example, sharing to third-party social media channels through the Site, remembering the username information or search queries on the next visit of the visitor to the Site.
- **To perform customization, targeting and advertising activities.** For example, displaying advertisements related to the interests of the visitors on the pages and products viewed by the visitors.

In accordance with Articles 5 and 8 of the KVK Law and/or in the presence of exceptions in the relevant legislation, your personal data may be processed for the above purposes without your consent, in cases where necessary in accordance with the legislation.

We, as the Company, may share your personal data within the scope of the Clarification Text with third parties from whom our Company benefits, limited to the realization of the above-mentioned purposes and in accordance with the legislation. We would like to point out that we may store your personal data on servers all over the world of the parties to which the data is transferred.

6. STORAGE OF PERSONAL DATA

Our company stores personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the relevant legal legislation. In this context, our Company first determines whether a period is foreseen for the storage of personal data in the relevant legislation, and if a period is determined, it acts in accordance with this period. If there is no legal period, personal data are stored for the period necessary for the purpose for which they are processed. At the end of the specified storage periods, personal data shall be destroyed in accordance with the periodic destruction periods or the application of our employees and with the determined destruction methods (deletion and / or destruction and / or anonymization).

7. PROCEDURES ON DELETION, DESTRUCTION AND ANONYMIZATION OF THE PERSONAL DATA

Personal data processed by the Company in accordance with the relevant Laws and Regulations, especially the Constitution of the Republic of Turkey, are deleted, destroyed or anonymized by the decision to be taken by the Company or upon the request of the person concerned, in accordance with the provision of Article 7 of the KVK Law.

During the deletion and destruction of personal data by the company, personal data is physically destroyed, deleted from the software with secure methods, and if necessary, it is securely deleted and destroyed by experts in a way that cannot be recovered. The Company will also consider the provisions in other laws regarding the deletion, destruction or anonymization of personal data and the procedures and principles to be determined by the KVK Board in a regulation.

8. COOKIE CHECK

You have the opportunity to customize your preferences for cookies by changing the settings of your browser:

Adobe Analytics	http://www.adobe.com/uk/privacy/opt-out.html
AOL	https://help.aol.com/articles/restore-security-settings-and-enable-cookie-settings-on-browser
Google Adwords	https://support.google.com/ads/answer/2662922?hl=en
Google Analytics	https://tools.google.com/dlpage/gaoptout
Google Chrome	http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647
Internet Explorer	https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies
Mozilla Firefox	http://support.mozilla.com/en-US/kb/Cookies
Opera	http://www.opera.com/browser/tutorials/security/privacy/
Safari	https://support.apple.com/kb/ph19214?locale=tr_TR

9. SCOPE OF THE RIGHTS OF THE DATA OWNER AND EXERCISING OF THESE RIGHTS

9.1. Rights of Data Owner

Pursuant to Article 11 of the KVK Law, you can apply to the Company and make requests on your personal data regarding the following issues:

- to learn whether personal data relating to them are processed,
- Requesting the relevant information if the personal data has been processed,
- Learning for what purposes personal data relating to them are processed and whether these data are used in line with these purposes,
- Knowing the third parties in the country or abroad to whom personal data is transferred,
- Requesting rectification of personal data relating to them in cases where they are processed incompletely or inaccurately, and to request informing third parties to whom your personal data were transferred about this rectification within this scope,
- Requesting their deletion, destruction or anonymization in the event that the reasons requiring the processing of personal data disappear, and requesting the notification of the transaction made within this scope to the third parties to whom the personal data has been transferred,
- Objecting to any conclusion arisen against the data owner by analysis of the processed personal data exclusively through automated systems,

9.2. Application Means

Applications of personal data owners regarding their rights arising from the KVK Law must be submitted to us in writing in accordance with Article 13 of the KVK Law or by other methods to be determined by the KVK Board ("Board"):

APPLICATION METHOD	APPLICATION ADDRESS	INFORMATION TO BE CITED IN THE
Personal Application with wet-ink signature or Application through Notary	Çankaya Mah. Çankaya Cad. No: 1B/68 Çankaya/ANKARA	The statement " <i>Information Request Under the Law on Protection of Personal Data</i> " should appear on the service envelope.
Application via registered e-mail (KEP)	atakulegyo@hs03.kep.tr	The subject of the e-mail should be " <i>Information Request Under the Law on Protection of Personal Data</i> ".
Application via Corporate E-mail	info@atakule.com.tr	The subject of the e-mail should be " <i>Information Request Under the Law on Protection of Personal Data</i> ".

- Your requests stated in your application shall be concluded free of charge as soon as possible and within 30 (thirty) days at the latest, depending on the nature of the request, and the result shall be notified to you in writing or electronically. However, if the proceeding requires an additional cost, you will be charged the fee in the tariff determined by the Personal Data Protection Board.
- The application and request made will be fulfilled without delay if deemed justified by the Company. In case of rejection of the application and request, the reason for the rejection will be notified to the relevant person in writing or electronically as specified in the application and request petition.
- In cases where the application and request are rejected by the company, the response is found to be insufficient, or the response is not given in a timely manner, the person concerned has the right to lodge a complaint with the KVK Board within 30 (thirty) days from the date of learning about the application and the response to the request, and in any case within 60 (sixty) days from the date of application.

10. IDENTIFICATION AND COMMUNICATION DETAILS OF DATA OPERATOR

This clarification text has been issued by Atakule Gayrimenkul Yatırım Ortaklığı A.Ş. established in Turkey, whose information is given below, addressed to the data owners with the capacity of “Data Controller”.

Commercial Title	: Atakule Gayrimenkul Yatırım Ortaklığı A
Address	: Çankaya Mahallesi Çankaya Caddesi No:
Mersis No	: 0095010287500018
Phone No	: 0312 447 65 00
Fax No	: 0312 447 65 75
E-Mail	: info@atakule.com.tr
Registered E-Mail	: atakulegyo@hs03.kep.tr