**CLARIFICATION TEXT ON CUSTOMER PERSONAL DATA**

*This Clarification Text on Customer Personal Data (****“Clarification Text”****) has been prepared by Arzum Elektrikli Ev Aletleri Sanayi ve Ticaret Anonim Şirketi (“***ARZUM/THE COMPANY”)** *acting in the capacity of the data controller in scope of clause 10 of the Personal Data Protection Law 6698 (****“The Law”****) and the Communique related to the Principles and Practices to be followed in fulfilment of the Clarification Obligation (****“Communique”****).*

We reserve the right to update this Clarification Text as well as the process, transfer of personal data, its purpose, collection methods and other topics taking place in the text at any times in scope of any potential amendments which may be made in the applicable legislation. You can easily follow up any updates and other detailed information regarding your personal data in our web site under the heading **“Personal Data Protection’’**.

Your personal data which are processed under this Clarification Text are the following:

**Identity:** Name – surname, date of birth, Turkish Republic identity number, tax identity number;

**Communication:** Telephone number, business place address, home address, e-mail address;

**Finance**: Bank information, credit card data (if any), e-invoice information;

**Other Data:** Customer transaction data, legal transaction data, log records related to transactions having been made in the web site, any information collected during conversations with the call center, any information collected during online sales, any data processed by membership activities in case of gaining membership.

 **(1)Legal Causes for Processing your Personal Data**

We, as one party, kindly request from you your personal data which are collected through the methods specified in this Clarification Text in line with the purposes stated below which shall allow the execution of the works required in order to fulfill our legal obligations arising from the respective legislation. The personal data are processed based on legal reasons according to the Consumer Protection Law 6502, other respective legislation and clauses 5 and 6 of the personal Data Protection Law, provided that such data shall not be used for purposes and in scopes other than specified by this Clarification Text and by taking technical and administrative measures related to data security. For the use in any various marketing and advertising activities; the process will be realized only upon your explicit consent.

 **(2) Transferring your Personal Data**

Your personal data which have been collected as specified in this Clarification Text and processed for specified purposes may be shared within the terms and purposes of personal data processing specified in clauses 8 and 9 of the Law with the company’s stakeholders, company’s executives, affiliates and subsidiaries, real persons or private law persons/entities and suppliers as required by nature of the services. However, personal data are shared with courts and other public institutions due to our legal obligations but not limited to such.

Any required technical and legal measures are taken in order to prevent any violation of rights during data transfer to third parties. Nevertheless, ARZUM shall not be responsible for the data protection policies of third parties having received the personal and any violations having occurred in the risk area which is under such third party’s responsibility.

**(3) Collection of your Personal Data**

Your personal data are collected by us by automatic and/or non-automatic methods in written or electronically. The information collected from you by us through various methods such as online and offline or collected in different times may be matched and used according to the Law and this Clarification Text. In this scope, your personal data will be collected in line with the personal data processing terms and purposes specified in clauses 5 and 6 of the Law the legal reasons and purposes taking place in this Clarification Text.

**(4) Purposes of processing your personal Data**

The purposes of processing your personal data are: to enable the execution of the contract having been concluded between you and the company in case you have purchased a product or service or if you have participated in the campaigns of the company and/or for other reasons; to comply with the obligations stipulated by administrative units in respect with information retention, reporting and notification; to provide our products/services requested by you; to be acquainted with our customers and to increase communication/service quality within the frame of the information for which you have given consent to process; to ensure the correct product availability; to maintain the commercial relationship; to gain statistical information; to present current information of products and campaigns in order to increase the service quality which we provide to our customers; to use such data for communication and marketing such as promotion and to send commercial electronic mails to you if you have consent for doing so.

In all cases, all the data which you may provide to our company according to both the distant sales contract and the states specified in the legislation are processed only in compliance with the respective legislation and/or the scope for which you have given consent for the collection of your data.

**(5) Your Rights**

In scope of clause 11 of the Personal Data Protection Law and in the capacity of the customer, you can submit your requests related to your rights and to the execution of the Law with the application form created by ARZUM and available in our website or by requesting this form in hand and submitting with your wet-ink signature or via the notary public to our address ‘’Flatofis Binası, Otakçılar Caddesi, Numara 78, Kat 1, B Blok, Numara B1B, Eyüp 34050 İstanbul / Türkiye”, or;

By submitting to the request by e-mail with the “secure electronic signature” of the applicant as defined in the Electronic Signature Law 5070 to the related address defined in Arzum@hs02.kep.tr or to our electronic mail address kvkk@arzum.com. Upon submitting your requests, your requests will be finalized free of charge latest within 30 days depending on the nature of your request. If your request will be answered in written, no fee will be charged up to the first 10 (ten) pages whereas a handling fee of 1 TL will be charged for each page exceeding 10 (ten) pages according to the Communique related to the Principles and Practices of Applying to the Data Controller. If the answer to your request will be presented in recorded media such as CD, flash memory etc. the cost of the recording media will be charged to you.

Also, according to clause 4 of the Personal Data Protection Act, ARZUM is obligated to keep your personal data in a correct and updated manner. In this scope, our customers have to share their correct and updated data with ARZUM to enable ARZUM’s fulfillment of its obligations arising from the legislation in effect. If your personal data should be changed in any manner, please update your personal data by sending an e-mail to: kvkk@arzum.com and writing “Update of Personal Data” in the subject section.

**(6) Retention and Destruction:**

Your personal data which are processed under this Clarification Text shall be retained for a period as required by the processing purpose provided that the legal retention period shall not be exceeded and upon the expiration of such period your personal data will be destroyed. Some of the retention and destruction periods of your personal data are as following:

| **PROCESS** | **RETENTION PERIOD** | **DESTRUCTION PERIOD** |
| --- | --- | --- |
| Part of the contract process and retention of the contract | 10 years following expiration of the contractual relationship | Within 180 days following the expiration of the retention period |
| Any data collected as required by other related legislation | Up to the period as stipulated in the related legislation | Within 180 days following the expiration of the retention period |
| Payment transactions | 10 years following the expiration of the contractual relationship | Within 180 days following the expiration of the retention period |
| Customer Log/Registration/Tracking Systems | 10 years | Within 180 days following the expiration of the retention period |
| Customer data | 10 years as of the delivery of the product/service which has been purchased by the customer according to the Turkish Code of Obligations clause 146 and Turkish Commercial Code clause 82. | Within 180 days following the expiration of the retention period |
| Potential customer data | 3 years | Within 180 days following the expiration of the retention period |
| Camera records | 1 month | Within 180 days following the expiration of the retention period |
| Filing of any documents | 10 years | Within 180 days following the expiration of the retention period |

**This is for your kind information.**