

RÖNESANS REASÜRANS VE SİGORTA BROKERLİK ANONİM ŞİRKETİ

PERSONAL DATA PROTECTION AND PROCESSING POLICY

Target Audience: All natural persons whose personal data is processed by R nesans Reas rans ve Sigorta Brokerlik A.Ş.

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TABLE OF CONTENTS

1. **INTRODUCTION**
 - 1.1. Purpose
 - 1.2. Scope
 - 1.3. Legal Basis
 - 1.4. Definitions
 2. **PERSONAL DATA PROTECTION MATTERS**
 - 2.1. Ensuring the Security of Personal Data
 - 2.2. Protection of Special Categories of Personal Data
 - 2.3. Raising Awareness on Personal Data Protection and Processing
 3. **PROCESSING OF PERSONAL DATA**
 - 3.1. Processing Personal Data in Compliance with Legislation
 - 3.2. Conditions for Processing Personal Data
 - 3.3. Processing of Special Categories of Personal Data
 - 3.4. Informing the Data Subject
 - 3.5. Transfer of Personal Data
 4. **PERSONAL DATA INVENTORY PARAMETERS**
 5. **MEASURES TAKEN FOR THE PROTECTION OF PERSONAL DATA**
 6. **STORAGE AND DESTRUCTION OF PERSONAL DATA**
 7. **RIGHTS OF DATA SUBJECTS AND THE EXERCISE OF THESE RIGHTS**
 - 7.1. Rights of the Data Subject
 - 7.2. Exercise of the Data Subject's Rights
 - 7.3. Responding to Applications
 - 7.4. Rejection of the Data Subject's Application
 - 7.5. Data Subject's Right to File a Complaint with the Personal Data Protection Board
 8. **ENFORCEMENT**
 9. **ENTRY INTO FORCE AND ANNOUNCEMENT**
- Appendices**
- **Appendix 1:** Data Categories and Personal Data
 - **Appendix 2:** Purposes for Processing Categorical Personal Data
 - **Appendix 3:** Persons to Whom Personal Data is Transferred and Purposes of Transfer

RÖNESANS REASÜRANS VE SİGORTA BROKERLİK ANONİM ŞİRKETİ PERSONAL DATA PROTECTION AND PROCESSING POLICY

Rönesans Reasürans Ve Sigorta Brokerlik A.Ş ("Rönesans") is a company that leads the sector's transformation with pioneering services and distinctive expertise in insurance brokerage, creating value for its stakeholders. Rönesans places great importance on the protection of personal data in its operations and considers it a priority in its business and processes. The Rönesans Personal Data Protection and Processing Policy ("Policy") is the primary regulation for aligning the personal data processing principles and procedures, as defined by Law No. 6698 on the Protection of Personal Data ("Law"), with the organization's and business processes of Rönesans. In line with the principles of this Policy, Rönesans processes and protects personal data with a high level of responsibility and awareness, ensuring necessary transparency by informing data subjects.

1.1. Purpose

The purpose of this Policy is to ensure the effective implementation of the procedures and principles prescribed by the Law and related legislation, adapted to the organization and processes of Rönesans. Rönesans takes all necessary administrative and technical measures to process and protect personal data, creates internal procedures, raises awareness, and provides all necessary training to foster a consciousness of these matters. All necessary measures are taken, and appropriate and effective control mechanisms are established to ensure the compliance of shareholders, authorities, employees, and business partners with the processes stipulated by the Law.

1.2. Scope

The Policy covers all personal data obtained through automatic means or through non-automatic means, provided they are part of a data recording system, within the business processes of Rönesans.

1.3. Legal Basis

The Policy is based on the Law and related legislation. Personal data is processed to fulfill the legal obligations arising from various laws, including Law No. 6948 on Industrial Registry, Law No. 4703 on the Preparation and Implementation of Technical Legislation on Products, Law No. 132 on the Establishment of the Turkish Standards Institute (TSE) and its amendments, Law No. 6502 on the Protection of Consumers, Law No. 1774 on Identity Notification, Law No. 4857 on Labor, Law No. 6331 on Occupational Health and Safety, Law No. 5510 on Social Insurance and General Health Insurance, Law No. 4447 on Unemployment Insurance, Law No. 6102 on Turkish Commercial Code, Law No. 213 on the Tax Procedure Code, and other related legislation.

In cases of inconsistency between the applicable legislation and the Policy, the provisions of the legislation in force shall prevail. The regulations stipulated by the relevant legislation are adapted into Rönesans practices through the Policy.

1.3 . Definitions

Explicit Consent	It expresses the consent that is based on being informed about a specific subject and is declared freely.
Application Form	An application form prepared in accordance with the Law No. 6698 on the Protection of Personal Data and the Communiqué on the Procedures and Principles for Application to the Data Controller issued by the Personal Data Protection Authority, which includes the applications to be made by data subjects to exercise their rights.
Relevant User	They are individuals within the data controller organization, or those processing personal data in accordance with the authority and instructions received from the data controller, excluding the person or unit responsible for the technical storage, protection, and backup of the data
Disposing	The deletion, destruction, or anonymization of personal data.
Recording	Any environment containing personal data processed by fully or partially automated means or through non-automated means, provided that they are part of a data recording system.
Personal Data	Any information relating to an identified or identifiable person.
Processing of Personal Data	Any operation performed on personal data, such as obtaining, recording, storing, preserving, modifying, rearranging, disclosing, transferring, acquiring, making available, classifying, or preventing the use of the data, whether fully or partially automated or through non-automated means provided they are part of a data recording system.
Anonymization of Personal Data	The process of rendering personal data in such a way that it cannot be associated with an identified or identifiable natural person, even when matched with other data.
Data Subject	A person whose personal data is processed by Rönensans or on its behalf.
Deletion of Personal Data	The deletion of personal data means rendering personal data inaccessible and unusable for Relevant Users in any way.
Destruction of Personal Data	The process of rendering personal data inaccessible, irretrievable, and unusable by anyone in any way.
Board	Personal Data Protection Board

Authority	Personal Data Protection Authority
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Sensitive Personal Data	Data related to a person's race, ethnic origin, political opinion, philosophical belief, religion, sect, or other beliefs; clothing and appearance; membership in associations, foundations, or trade unions; health; sexual life; criminal convictions and security measures; as well as biometric and genetic data.
Periodic Destruction	The process of deletion, destruction, or anonymization that will be carried out ex officio at recurring intervals when all conditions for the processing of personal data stipulated in the Law have ceased to exist, as specified in the personal data storage and destruction policy.
Data Processor	A natural or legal person who processes personal data on behalf of the data controller based on the authority granted by the data controller.
Data Recording System	A recording system in which personal data is processed by structuring it according to certain criteria.
Data Subject / Relevant Person	A natural person whose personal data is processed.
Data Controller	A natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.
Data Representative	A person appointed to fulfill the duties of the Data Controller under the relevant legal provisions of the Law.
Regulation	Regulation on the Deletion, Destruction, or Anonymization of Personal Data published in the Official Gazette on October 28, 2017.

1. SUBJECTS OF PERSONAL DATA PROTECTION

1.1. Ensuring the Security of Personal Data

Rönesans takes necessary measures, as stipulated in Article 12 of the Law, to prevent unlawful disclosure, access, transfer, or any other potential security issues regarding personal data, according to the nature of the data. Rönesans implements measures and conducts audits to ensure the necessary level of personal data security in accordance with the guidelines published by the Personal Data Protection Authority.

1.2. Protection of Sensitive Personal Data

Measures taken to protect sensitive personal data, such as race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing and appearance, membership in associations, foundations, or trade unions, health, sexual life, criminal convictions, security measures, and biometric and genetic data, are diligently applied, and necessary audits are conducted.

1.1. Kişisel Verilerin Korunması ve İşlenmesi Bilincinin Geliştirilmesi

Rönesans provides the necessary training to relevant parties for the lawful processing, access, preservation of personal data, and the development of awareness regarding the exercise of rights. To enhance employees' awareness of personal data protection, Rönesans establishes the necessary business processes and seeks support from consultants when needed. Any deficiencies encountered in practice and the results of the training are evaluated by Rönesans management. Based on these evaluations, new training sessions are organized as needed, depending on changes in the relevant legislation.

2. PROCESSING OF PERSONAL DATA

2.1. Lawful Processing of Personal Data

Personal data shall be processed in accordance with the principles outlined below.

i. Lawfulness and Fairness

Personal data is processed in compliance with the law and the principle of fairness, to the extent required by business processes, and limited in a way that does not harm the fundamental rights and freedoms of individuals.

ii. Ensuring Data is Up-to-Date and Accurate

Necessary measures are taken, and planned and organized work is conducted to keep the processed personal data up-to-date and accurate.

iii. Processing for Specific, Explicit, and Legitimate Purposes

Personal data is processed in accordance with the legitimate purposes determined and disclosed in the ongoing business processes.

iv. Being Relevant, Limited, and Proportional to the Purpose of Processing

Personal data is collected in the quantity and quality required by business processes, and is processed in a limited manner according to the specified purposes.

v. Retention for the Necessary Duration

Personal data is retained for at least the period required for the purpose of processing personal data as stipulated by the relevant legislation. If a specific duration is prescribed by the relevant legislation for the retention of personal data, that period will be followed. If not, personal data will be retained for as long as necessary for the purposes for which they were processed. At the end of the retention periods, personal data will be destroyed using appropriate methods (deletion, destruction, or anonymization) in accordance with periodic destruction schedules or at the request of the data subject.

2.2. Conditions for Processing Personal Data

Personal data may be processed based on the explicit consent of the data subject or one or more of the other conditions specified below.

i. Existence of Explicit Consent of the Data Subject

The processing of personal data is carried out with the explicit consent of the data subject. The explicit consent of the data subject occurs when they are informed about a specific issue and provide their free will.

ii. Absence of Explicit Consent of the Data Subject

In the event that any of the conditions listed below are present, personal data may be processed without the need for the explicit consent of the data subject.

a. Explicit Regulation in Laws

2. **a. Processing Without the Data Subject's Consent**

If there is a clear regulation in the laws regarding the processing of personal data, personal data may be processed without obtaining the consent of the data subject.

3. **i. Inability to Obtain Consent Due to Physical Impossibility**

In cases where a person is unable to express their consent due to physical impossibility or where their consent cannot be deemed valid, if the processing of their personal data is necessary to protect the life or physical integrity of themselves or another person, the personal data of the data subject may be processed.

4. **ii. Directly Related to the Establishment or Performance of a Contract**

If the processing of personal data is directly related to the establishment or performance of a contract to which the data subject is a party, the personal data of the data subject may be processed.

5. **iii. Fulfillment of Legal Obligations**

When fulfilling legal obligations, if the processing of personal data is mandatory, the personal data of the data subject may be processed.

6. **iv. Personal Data Made Public by the Data Subject**

Personal data of data subjects who make their personal data public may be processed to the extent of that publicity.

7. **v. Mandatory Processing for the Establishment or Protection of a Right**

If the processing of personal data is mandatory for the establishment, exercise, or protection of a right, the personal data of the data subject may be processed.

8. **vi. Mandatory Processing for Legitimate Interests**

Provided that it does not harm the fundamental rights and freedoms of the data subject, if the processing of personal data is mandatory for the legitimate interests of Rönésans, the personal data of the data subject may be processed.

9. **1.2. Processing of Sensitive Personal Data**

Rönésans processes sensitive personal data in accordance with the principles set forth in the Law and this Policy, taking all necessary administrative and technical measures as determined by the Authority, and according to the following procedures and principles:

10. **i. Processing of Sensitive Personal Data Other Than Health and Sexual Life**

Sensitive personal data, other than health and sexual life, may be processed without requiring the explicit consent of the data subject if there is a clear provision in the laws regarding its processing. In cases not explicitly anticipated by the laws, the explicit consent of the data subject will be obtained.

11. **ii. Processing of Sensitive Personal Data Related to Health and Sexual Life**

Sensitive personal data related to health and sexual life may be processed without requiring the explicit consent of the data subject by persons or authorized institutions and organizations that are bound by a confidentiality obligation for the purposes of protecting public health, preventive medicine, conducting medical diagnosis, treatment, and care services, and planning and managing health services and financing. Otherwise, the explicit consent of the data subject will be obtained.

11.1 Informing the Data Subject

Rönésans informs the data subjects about the purposes for which their personal data is processed, the parties with whom it is shared, the methods by which it is collected, the legal basis for processing, and the rights they possess regarding the processing of their personal data, in accordance with the relevant legislation. In this regard, the protection of their personal data is carried out in accordance with the principles outlined in the Policy and is dependent on other policy documents and informational texts prepared within this framework.

i. Transfer of Personal Data

Personal data may be transferred with the explicit consent of the data subject; however, personal data can also be transferred to third parties by taking all necessary security measures, including methods stipulated by the Authority, based on one or more of the following conditions:

- a. If explicitly provided for in the laws,
- b. If it is directly related and necessary for the establishment or performance of a contract,
- c. If it is mandatory for Rõnesans to fulfill its legal obligations,
- d. Provided that the data subject has made the personal data public, it can be transferred for the purpose of publicizing it,
- e. If it is mandatory for the establishment, use, or protection of Rõnesans's, the data subject's, or third parties' rights,
- f. If it is mandatory for Rõnesans to ensure its legitimate interests without harming the fundamental rights and freedoms of the data subject,
- g. If it is necessary to protect the life or physical integrity of a person who is unable to express their consent due to actual impossibility or whose consent is not legally recognized.

Personal data can be transferred to those designated as "Foreign Countries with Adequate Protection," as determined by the Authority, under any of the conditions stated above. Personal data can also be transferred to those classified as "Foreign Countries with Data Controllers Who Provide Adequate Protection" in cases where adequate protection is not available, and data controllers in Turkey and foreign countries have provided a written commitment of adequate protection, along with the Authority's permission, in accordance with the conditions prescribed in the legislation.

ii. Transfer of Sensitive Personal Data

Sensitive personal data may be transferred in accordance with the principles established in the Policy, by taking all necessary administrative and technical measures, including methods determined by the Authority, under the following conditions:

- a. Sensitive personal data other than health and sexual life can be transferred without the explicit consent of the data subject if there is an explicit provision regarding the processing of personal data in the laws; otherwise, the explicit consent of the data subject is required.

a. Sensitive personal data regarding health and sexual life may be processed without requiring explicit consent from the data subject by persons or authorized institutions and organizations under a confidentiality obligation, for the purposes of protecting public health, preventive medicine, medical diagnosis, the implementation of treatment and care services, and planning and managing health services and their financing. Otherwise, the explicit consent of the data subject must be obtained.

Personal data may be transferred to those classified as “Foreign Countries with Adequate Protection” if any of the above conditions exist. In the absence of adequate protection, personal data can be transferred to those classified as “Foreign Countries with Data Controllers Who Provide Adequate Protection,” subject to the data transfer conditions regulated in the legislation.

12. PARAMETERS OF PERSONAL DATA INVENTORY

Rönesans processes personal data categories belonging to data subjects, including Job Applicants, Employees, Interns, Shareholders/Partners, Potential Product or Service Recipients, Supplier Representatives, Supplier Employees, Service Recipients, Guardians/Representatives, Other Business Partners/Solution Partners, Company Officials, Visitors, and Family Members and Relatives, within the business processes of health insurance, information technology, human resources, reinsurance, claims, accounting, and finance (Appendix-1). The processing purposes for personal data (Appendix-2) are specified accordingly. The purposes for processing data based on data categories are reported by Rönesans in its field at <https://verbis.kvkk.gov.tr/>.

The purposes for processing personal data are conducted in accordance with the principles specified in Article 4 of the Law, aiming to inform the relevant individuals in line with Article 10 of the Law and other regulations, based on at least one of the personal data processing conditions stated in Articles 5 and 6 of the Law, and in compliance with the general principles outlined in the Law.

Personal data may be shared in accordance with the principles specified in section “3.5. Transfer of Personal Data” of the Policy: with real persons or private legal entities, business partners, suppliers, authorized public institutions and organizations, private insurance companies, and domestic and foreign organizations with which services are contracted or collaborations are made, for the specified purposes (Appendix-3).

13. MEASURES TAKEN TO PROTECT PERSONAL DATA

Rönesans takes the necessary technical and administrative measures to protect personal data processed in accordance with the procedures and principles specified in the Law. This includes conducting necessary audits and carrying out awareness-raising and training activities.

In the event that processed personal data is obtained by third parties unlawfully despite all technical and administrative measures being taken, Rönésans will inform the relevant individuals and units as soon as possible.

STORAGE AND DELETION OF PERSONAL DATA

Rönésans retains personal data for at least the duration prescribed by the relevant legislation necessary for the purpose of processing the data. If a duration is specified in the relevant legislation, Rönésans will comply with this duration; if no legal duration is provided, personal data will be stored for as long as necessary for the purpose of processing. At the end of the designated retention periods, personal data will be deleted in accordance with the periodic destruction times or upon the request of the data subject, using the specified methods (deletion, destruction, or anonymization).

12. RIGHTS OF PERSONAL DATA SUBJECTS AND EXERCISE OF THESE RIGHTS

12.1. Rights of the Personal Data Subject

Personal data subjects have the following rights arising from the Law:

- i. To learn whether personal data is being processed,
- ii. To request information regarding the personal data if it has been processed,
- iii. To learn the purpose of processing personal data and whether it is used in accordance with its purpose,
- iv. To know the third parties to whom personal data has been transferred, whether within the country or abroad,
- v. To request the correction of personal data if it is incomplete or incorrectly processed, and to request that the transaction performed in this context be notified to the third parties to whom personal data has been transferred,
- vi. To request the deletion or destruction of personal data when the reasons necessitating its processing have ceased to exist, even if it has been processed in accordance with the Law and relevant provisions of other laws, and to request that the transaction performed in this context be notified to the third parties to whom personal data has been transferred,
- vii. To object to the emergence of a result against the person by analyzing the processed data exclusively through automated systems,
- viii. To request compensation for damages in case of damage due to unlawful processing of personal data.

12.2. Exercising the Rights of the Personal Data Subject

Personal data subjects can submit their requests regarding the rights listed in Section 6.1 to Rönésans through the methods determined by the Authority. Personal data subjects and those authorized to apply on their behalf can apply to Rönésans by filling out the "Data Subject Application Form" (Appendix-4).

12.3. Response of Rönésans to Applications

Rönésans concludes the applications made by personal data subjects in accordance with the Law and other relevant legislation. Requests submitted to Rönésans in a proper manner are resolved as soon as possible and at the latest within 30 (thirty) days, free of charge. However, if the transaction requires an additional cost, a fee may be charged according to the tariff determined by the Authority.

12.4. Rejection of the Personal Data Subject's Application

Rönésans may reject the request of the applicant, providing justification, in the following cases:

- i.** Processing personal data for purposes such as research, planning, and statistics by anonymizing it through official statistics,
- ii.** Processing personal data for artistic, historical, literary, or scientific purposes, or within the scope of freedom of expression, provided that it does not violate national defense, national security, public safety, public order, economic security, privacy of private life, or personal rights,
- iii.** Processing personal data within the scope of preventive, protective, and intelligence activities carried out by public institutions and organizations assigned and authorized by law to ensure national defense, national security, public safety, public order, or economic security,
- iv.** Processing personal data by judicial authorities or enforcement agencies in relation to investigations, prosecutions, trials, or enforcement procedures,
- v.** Processing personal data as necessary for the prevention of crimes or for criminal investigations,
- vi.** Processing personal data that has been publicly disclosed by the data subject themselves,
- vii.** Processing personal data by public institutions and organizations authorized by law, as well as professional organizations with the nature of public institutions, as necessary for the execution of their auditing or regulatory duties, or for disciplinary investigations or prosecutions,
- viii.** Processing personal data as necessary for the protection of the State's economic and financial interests concerning budget, tax, and financial matters,
- ix.** The possibility that the request of the personal data subject may hinder the rights and freedoms of others,
- x.** Requests that require disproportionate effort,
- xi.** The requested information is public information.

11.2. Right of the Personal Data Subject to Lodge a Complaint with the KVK Authority

In accordance with Article 14 of the Law, if the application is rejected, if the response given is found insufficient, or if no response is provided within the prescribed period, the data subject may lodge a complaint with the Authority within thirty days from the date they learn of Rönensans's response and in any case within sixty days from the date of application.

11.3. Information That May Be Requested from the Personal Data Subject Making the Application

Rönensans may request information from the relevant person to determine whether the applicant is a personal data subject. Rönensans may also ask questions to clarify the matters mentioned in the personal data subject's application.

12. EXECUTION

The Policy has been approved by the Board of Directors and has come into effect. The technical execution of the Policy is ensured by the "Personal Data Retention and Destruction Policy" (Appendix-5).

In business processes, the execution of the Policy is carried out through the following documents: "Customer Information Text and Explicit Consent Statement" (Appendix-6), "Supplier Confidentiality Agreement, Supplier Information Text, and Explicit Consent Statement" (Appendix-7), "Employee Information Text and Explicit Consent Statement" (Appendix-8), "Job Candidate Information Text and Explicit Consent Statement" (Appendix-9), "Website Cookie Information Text" (Appendix-10), "Camera Information Text and Explicit Consent Statement" (Appendix-11), "Carrier Information Text and Explicit Consent Statement" (Appendix-12).

The Board of Directors is responsible for the enforcement of the Law and the Policy, and the Rönensans Personal Data Protection Committee is responsible for monitoring, coordinating, and supervising all related operations and processes.

13. EFFECTIVENESS AND ANNOUNCEMENT

The Policy has come into effect as of the date of its publication. Changes to the Policy will be made available to personal data subjects and relevant individuals through publication on Rönesans's website (<https://www.ronesansbroker.com/>). Policy changes will take effect on the date of their announcement.

Appendix 1 - Data Categories and Personal Data

Appendix 2 - Purposes of Personal Data Processing

Appendix 3 - Recipients of Personal Data and Purposes of Transfer

Appendix 4 - Personal Data Owner Application Form

Appendix 5 - Personal Data Retention and Destruction Policy

Appendix 6 - Customer Information Text and Explicit Consent Statement

Appendix 7 - Supplier Confidentiality Agreement, Supplier Information Text, and Explicit Consent Statement

Appendix 8 - Employee Information Text and Explicit Consent Statement

Appendix 9 - Job Candidate Information Text and Explicit Consent Statement

Appendix 10 - Website Cookie Information Text

Appendix 11 - Camera Information Text and Explicit Consent Statement

Appendix 12 - Carrier Information Text and Explicit Consent Statement

APPENDIX 1 - Data Categories and Personal Data

Tax Type	Personal Data
ID	Name, Surname
	Mother-Father Name
	DOB
	Birth Place
	Marital Status

	National ID Serial Number
	ID Number
	Passport Number
	Geçici TC Kimlik Numarası
	Gender
	ID Card
	Driver's License

	Nationality
Contact	Address
	Email Address
	Address
	Registered e-mail address
	Telephone Number
Personnel Record	Payroll Information
	Disciplinary Investigation
	Employment Entry and Exit Document Records
	Curriculum Vitae Information
	Military Status
Legal Action	Information in correspondence with judicial authorities, information in case files, etc.
Client Transaction	Invoice
	Promissory Note
	Check Information
	Request Information
Transaction Security	Transaction Security (such as IP address information, website login/logout information, passwords, and credentials)
	IP Address
	Website Login / Logout Information
	Passwords and Credentials
Risk Management	(such as information processed for the management of commercial, technical, and administrative risks)
Finance	Balance Sheet Information
	Financial Performance Information
	Credit and Risk Information
	Asset Information
	Bank Account Number
	IBAN Number
	Credit Card Information
Professional Experience	Diploma Information
	Courses Attended
	In-Service Training Information
	Certificates

Last Employment Company Information

	References
Marketing	Shopping History
	Cookie Records
Visual and Audio Visual Records	Camera Records
	Voice Records
	Photographs
Special Categories of Personal Data	
	Information Regarding Disability Status
	Blood Type Information
	Personal Health Information
	Information on Devices and Prosthetics Used
	Information Regarding Disability Status
	Blood Type Information
	Personal Health Information
Information on Devices and Prosthetics Used	
Information Related to Sexual Life	Information Regarding Sexual Life
Criminal Conviction and Security Measures	Information Regarding Criminal Conviction
	Information Regarding Security Measures
Other Information	
Family Information	Number of Children
	Spouse Employment Information
	Child Education and Age Information
Employment Data	Branch-Department
	Working Arrangement
	Profession
	Professional Card Information
Signature Information	Wet or electronic signatures, fingerprints, and special markings found on documents that qualify as personal data
Website Usage Data	Browser Information
	Location Information

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Reputation Management Information	(Information collected for the purpose of protecting the company's commercial reputation, including evaluation reports created in relation to this and information about the actions taken.
Incident Management Information	(Personal data processed for the purpose of taking necessary legal, technical, and administrative measures against developing events to protect the commercial rights and interests of the company, as well as the rights and interests of its customers.)
Request and Complaint Management Information	(Personal data related to the receipt and evaluation of all kinds of requests or complaints directed to the company.
	Private Health Insurance
Insurance Information	Automatically Enrolled Private Pension System (BES)
	Social Security Institution Data
Vehicle Information	Plate Number
Compliance Information	Personal data processed within the scope of compliance
Audit and Inspection Information	Personal data processed during the company's internal or external audit activities.

APPENDIX 2 - Purposes of Processing Categorical Personal Data

Activity
Execution of Emergency Management Processes
Execution of Information Security Processes
Execution of Candidate / Intern / Student Selection and Placement Processes
Execution of Candidate Application Processes
Fulfillment of Employment Contracts and Legal Obligations for Employees
Execution of Benefits and Interests Processes for Employees
Execution of Audit / Ethical Activities
Execution of Training Activities
Execution of Access Authorizations
Execution of Activities in Compliance with Legislation
Execution of Finance and Accounting Operations
Execution of Company / Product / Service Loyalty Processes
Provision of Physical Space Security
Execution of Assignment Processes
Monitoring and Execution of Legal Affairs
Execution of Internal Audit / Investigation / Intelligence Activities
Execution of Communication Activities
Planning of Human Resources Processes

Execution / Auditing of Business Activities
Execution of Occupational Health / Safety Activities
Execution of Activities for Ensuring Business Continuity
Execution of Logistics Activities
Execution of Goods / Services Procurement Processes
Execution of Post-Sales Support Services for Goods / Services
Execution of Goods / Services Sales Processes
Execution of Goods / Services Production and Operations Processes
Execution of Customer Relationship Management Processes
Execution of Activities Aimed at Customer Satisfaction
Organization and Event Management
Execution of Marketing Analysis Studies
Execution of Performance Evaluation Processes
Execution of Advertising / Campaign / Promotion Processes
Execution of Risk Management Processes
Execution of Storage and Archiving Activities
Execution of Social Responsibility and Civil Society Activities
Execution of Contract Processes
Execution of Strategic Planning Activities
Monitoring of Requests / Complaints
Provision of Security for Movable Goods and Resources
Execution of Supply Chain Management Processes
Execution of Compensation Policy
Execution of Marketing Processes for Products / Services
Provision of Security for Data Controller Operations
Work and Residence Permit Procedures for Foreign Personnel
Execution of Investment Processes
Execution of Talent / Career Development Activities
Provision of Information to Authorized Persons, Institutions, and Organizations
Execution of Management Activities
Creation and Monitoring of Visitor Records

APPENDIX 3 – Persons to Whom Personal Data is Transferred and Purposes of Transfer

In accordance with Articles 8 and 9 of the Rönensans Law, personal data of candidates, employees, shareholders/partners, potential buyers of products or services, interns, supplier representatives, supplier employees, individuals receiving products or services, others—business partners/solution partners, company officials, visitors, guardians-representatives, family members, and relatives can be transferred to the categories of persons listed below

**Persons to Whom Data
May Be Transferred**

Definition

Purpose and Scope of Data
Transfer

Real persons or private legal entities

Real or legal persons with whom Rönésans is in a relationship or conducts transactions due to its activities

Limited to the business and transactions conducted
 Limited to the planning, execution, and auditing of strategies related to Rönésans's commercial activities.

Shareholder

Real persons who have established a partnership relationship with Rönésans.

Business Partners	Business partners with whom Rönésans has relationships for purposes such as the promotion and marketing of its products and services, and after-sales support, including partner banks	Limited to the establishment and execution of partnership purposes and activities
Legally Authorized Public Institutions and Organizations	Public institutions and organizations authorized to receive information and documents from Rönésans according to relevant legislative provisions, such as the Social Security Institution, Tax Offices, etc.	Limited to the purpose requested by the relevant public institutions and organizations based on their legal authority
Private Insurance Companies	Individual Retirement, Health, etc. Private Insurance Information	Limited to private insurance record information
Domestic and foreign organizations with which contracted services are received and cooperation is established	Institutions or organizations that provide contracted services and operate in accordance with specific conditions established under relevant legislative provisions, and with which cooperation is established	Limited to subjects related to their areas of activity and the principles of contracts and cooperation protocols
Suppliers	Parties providing services to Rönésans in accordance with data processing purposes and requests	Limited to the procurement of goods and services for Rönésans to carry out its commercial activities from external source