

ANATOLIA TANI VE BİYOTEKNOLOJİ ÜRÜNLERİ AR-GE SAN. VE TİC. A.Ş.**PRIVACY POLICY FOR THE SUBSCRIPTION PROGRAM**

This is the Privacy Policy of the **Anatolia Subscription Program**. This Privacy Policy provides information on the processing of personal data of **ANATOLIA TANI VE BİYOTEKNOLOJİ ÜRÜNLERİ AR-GE SAN. VE TİC. A.Ş.** or its subsidiaries ("ANATOLIA") (i) customers, (ii) Loyalty Program members, (iii) **ANATOLIA** website visitors and/or (iv) **ANATOLIA** application users, if any, or (v) commercial communication channels and the persons related who agree to receive general and personalized campaign information.

This Privacy Policy may change over time. We recommend that you review the Privacy Policy regularly to see possible changes. This Privacy Policy was last modified in May 2023.

1- When is the Privacy Policy Effective?

This Privacy Policy applies and will be valid if you are (i) one of our customers, (ii) a member of the Anatolia Subscription Program, (iii) a visitor to the ANATOLIA website for subscription, and/or (iv) a user of the ANATOLIA Application (Applications), or (v) you give your consent to general and personalized campaign information through commercial communication channels.

On the website, you can find a number of links to other websites. Although these websites have been carefully selected, we are not responsible for the processing of your personal data through these websites. Therefore, this Privacy Policy does not apply to the use of such websites. We recommend examining the privacy policies of these websites in terms of data processing activities on these websites.

2- Who Controls Your Data?

Your personal data processed by the Company, as the data controller, is registered at the address of Hasanpaşa Mahallesi Beydağı Sokak No 1-9 H, 34920 Sultanbeyli / İstanbul, registered in Türkiye with the register number 738589, ANATOLIA TANI VE BİYOTEKNOLOJİ ÜRÜNLERİ AR-GE SAN. VE TİC. A.Ş..

3- For What Purpose and on Which Legal Basis Is Your Personal Data Processed?

This Privacy Policy describes which personal data ANATOLIA processes for what purpose and on what legal basis.

3.1- Customer Service and Relations ManagementWhat is its purpose and legal basis?

When you apply to the Customer Service Centre with a question or a complaint, ANATOLIA may request some information to introduce yourself to help answer your questions. Any personal information provided is used only for these purposes and to improve customer support services. By entering your information into the system, you will give your consent for their evaluation and use in the Company's commercial activities.

In accordance with this procedure, the "necessity to process your personal data, provided that it is directly related to the establishment or performance of a contract" justifies processing your data.

Which personal data is processed for this purpose?

In order to respond appropriately to your question or complaint, the details of your question or complaint are recorded in the ANATOLIA customer database. You may also be asked for your contact details to provide up-to-date information about your questions or complaint.

3.2- Development and Improvement of Products and Services

What is its purpose and legal basis?

ANATOLIA regularly conducts market research and communicates with its customers through surveys for this purpose; uses the answers to these surveys to improve quality control processes and customer experience.

In accordance with this procedure, your personal data is processed based on the legal reason that "data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms".

Which personal data is processed for this purpose?

When you choose to participate in a survey, the personal information you provide (including your name, age, address, and e-mail address) may be processed.

3.3- General Offers

What is its purpose and legal basis?

If you accept receiving of the commercial electronic messages; As an ANATOLIA customer or a member of the Anatolia Subscription Program, you may receive offers or information from ANATOLIA ("**General Offers**").

General Offers are requested to provide information about ANATOLIA products, organizations, and company developments that may be of interest to you. These General Offers may include, but are not limited to the following:

- Electronic newsletters containing general information,
- Electronic newsletters containing company products,
- Newsletters containing information on company participation in events like fairs, congresses, etc.,
- Surveys that include your experiences with the product and the service you receive,
- Training and congress invitations.
- General Offers are sent based on your explicit consent.

You can receive General Offers from ANATOLIA website, Applications, and social media via e-mail. You can contact info@anatoliagenetworks.com about changing your Contact Preferences by

e-mail and you can withdraw your consent to sending commercial electronic messages at any time.

Which personal data is processed for this purpose?

ANATOLIA may process the personal information you provide (including your name, age, address and e-mail address) to send you General Offers.

Not receiving General Offers

You may stop receiving General Offers from ANATOLIA at any time. In this situation, any personal information that is no longer necessary will be erased or anonymized so that ANATOLIA cannot send you General Offers.

3.4- Technical and Functional Management of the Website and Applications

What is its purpose and legal basis?

When you visit our website or use the Apps, we process certain technical information (such as your IP address) to enable and manage the functionality of our online services for you. We can manage the Website and the Applications, for instance, to resolve technical issues or boost their reliability thanks to this technical information.

In accordance with this procedure, your personal data is processed based on the legal reason that "data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms".

Which personal data is processed for this purpose?

Technical data such as the IP address of your computer, tablet, or smartphone, the details of the pages you visit on the Website or the Applications, the web browser you use to browse the internet, the sites you have visited before/after, and the length of your visit/session are processed.

3.5- Generating Management Information and Statistics Data

What is its purpose and legal basis?

ANATOLIA conducts market trends research through statistical analysis. It uses the results of this research to evaluate its current products and services and to adapt its products, marketing activities, and service stations to new developments. Research results are only reported in total.

In accordance with this procedure, your personal data is processed based on the legal reason that "data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms".

3.6- Prevent, Detect, and Investigate Fraud

What is its purpose and legal basis?

ANATOLIA may use the personal data you provide to prevent, detect, and investigate fraud and enforce its Terms and Conditions.

In accordance with this procedure, your personal data is processed based on the legal reason "it is necessary to fulfill a legal obligation".

4- Who can access your data?

ANATOLIA may disclose your personal data to one of the following:

- Authorized third parties involved in the Anatolia Subscription Program, such as any other company licensed to provide products and/or services to Anatolia Subscription Program members,
- All kinds of representatives, service providers, and/or subcontractors and subsidiaries of ANATOLIA,
- Any person to whom ANATOLIA offers to transfer its rights and/or duties,
- Business partners working together for the campaigns organized by ANATOLIA.

ANATOLIA uses third parties for some of its website hosting operations. Collected personal data may be transferred to authorized third parties, who may also be located outside the European Economic Area (EEA), as part of the service provided to you. For example, this may happen from time to time if any of our servers are located in a country outside the EEA, or if one of our service providers is located in a country outside the EEA. ANATOLIA has taken the necessary organizational and/or contractual measures to ensure that your personal data is processed only for the above-mentioned purpose and that an appropriate level of protection is applied to protect your personal data, to the extent that these third parties have the right to access your personal data to perform such transactions.

ANATOLIA may share your information with third parties, such as Anatolia Subscription Program's business partners, with your consent.

Unless we are legally authorized or required to do so, or we believe it is necessary to protect or defend our rights, property, or personal safety, or the rights, property, or personal safety of our users/customers or other individuals, except as set forth in this Privacy Policy, we do not use your personal data without your consent. We will not share it with third parties. ANATOLIA will only provide your personal data to supervisory authorities, financial authorities, and review authorities when required by law.

5- How long does ANATOLIA keep your personal data?

ANATOLIA will close the relevant accounts as soon as reasonably possible upon your request to discontinue your participation in the Subscription Program or to terminate your relationship with ANATOLIA. In addition, inactive customer accounts will be closed or inactivated, and accounts used in violation of this Privacy Policy or applicable Terms and Conditions will be closed. The information of closed or inactive accounts will be deleted or anonymized as soon as reasonably possible. In some cases, we may retain personal data from accounts that have been closed or inactivated for a longer period of time, for example, to prevent fraud or to take measures permitted or required by law.

6- Which cookies does ANATOLIA use?

The Website and/or Application uses cookies or similar technologies. A cookie is a small text file sent to your internet browser to enable us to recognize your browser when you return. ANATOLIA and its authorized service providers may use small graphic images known as "clear GIFs" that work with cookies to recognize you and your use of the Website and/or App. ANATOLIA and these service providers may also use other technologies to store information in your browser using locally shared objects or local storage, such as HTML 5 cookies, flash cookies, and other web application software methods.

By using these technologies, data may be collected about the use of the Website and/or Application, such as which pages are visited, your interaction with the information on the Website, and the duration of your visit.

Functional cookies - ANATOLIA may store cookies to ensure the functionality of the Website and/or the Application. Cookies remember your preferences, such as language and region, which remain your default settings when you visit the Website and/or App again. However, if you wish, you can choose to refuse or block cookies by changing your browser settings. You can look at your browser's Help function for more information.

Analytics cookies - ANATOLIA may use third-party cookies for web analysis. These cookies allow ANATOLIA to analyze the use of the Website and/or Application. This analysis is based on aggregated statistical data provided by ANATOLIA to authorized service providers and allows you to understand how you use ANATOLIA's Website and/or Application. ANATOLIA and these service providers may only provide these data to third parties if required by law.

Advertisement cookies - ANATOLIA may use third-party cookies for advertising. ANATOLIA may use its authorized service providers to serve advertisements on the Website and/or App and other websites on the internet. These service providers may place cookies on your browser and collect information that helps identify your devices, such as IP addresses or other unique device identifiers.

For additional information about cookies set by other parties, read our [cookie types](#) page.

ANATOLIA does not keep cookies any longer than necessary. We use session cookies and persistent cookies:

- The session cookie can track usage such as the websites you visit and the options you use. When you close your internet browser, the session ends, and the cookie is deleted.
- Persistent cookie allows the Website and/or Application to recognize you on your next visit. It remains on your system until you delete it.

Note that most browsers automatically accept cookies. If you do not want cookies to be used, you must delete or block cookies.

Information on how to delete or block cookies and general information about cookies can be found in the **Cookie Settings** plugin at www.anatoliagenetworks.com.

Note that when you refuse the use of cookies, you may still visit the website, but some functions may not work properly, and you may not be able to use all functions of the Website and/or Application.

Our website uses both first-party cookies (placed by the site you visit) and third-party cookies (placed by servers other than the site you visit). Below you can find the different types of cookies we use on our website. **These are: Necessary Cookies, Persistent Cookies, Functional, and Analytics Cookies.** You can find more detailed information about the types of cookies used on the ANATOLIA website on the [Cookie Policy](#) page.

Visitors may wish to restrict the use of cookies or prevent their settings altogether. Most browsers provide ways to control cookie behavior, such as the length of time they are stored, through built-in functions, or using third-party plug-ins. If you disable cookies, please note that

some features of our service may not work properly. For more information on how to manage and delete cookies, you can contact info@anatoliagenetworks.com.

On a mobile device, you can also adjust your settings to limit viewing. For example, you can disable Google Analytics or by installing Google's opt-out browser add-on.

7- Sharing of our website or its content via social media

When you contact us via social media, when you choose to share our website or its content via social media such as WhatsApp, LinkedIn, Facebook, and/or Twitter, your personal data (your name and your interest in ANATOLIA) can be shown by the visitors on your social media pages. Only the terms and conditions (including the privacy policy) on the social media site will apply to the use of social media sites. ANATOLIA is not responsible for the personal data processing or privacy policy of such social media websites, therefore ANATOLIA's Privacy Policy does not apply in this case.

8- Special Note: Are you under the age of 18?

ANATOLIA does not intentionally collect personal data of persons **under the age of 18**. If you are **under the age of 18**, please do not send us your personal data (for example, your name, address, and e-mail address). If you are **under the age of 18** and would like to ask a question or use the Website and/or App in a way that requires you to submit your personal data, please ask your parents to do so for you.

9- How does ANATOLIA protect your personal data?

We implement technology policies to protect your privacy against unauthorized access and misuse.

10- Questions and access, deletion requests

ANATOLIA tries to keep your data about you as accurate as possible. If you want to see, change, or delete the details you have given to ANATOLIA, please send your request to info@anatoliagenetworks.com via the [Related Person Application Form](#).

11- Your rights

By contacting ANATOLIA at info@anatoliagenetworks.com, you may;

- Learn whether your personal data is processed,
- Request information about it if it has been processed,
- Learn the purpose of processing your personal data and whether they are used in accordance with the purpose,
- Know the third parties to whom it has been transferred in the country or abroad,
- Request correction of personal data if it is incomplete or incorrectly processed,
- Request the deletion or destruction of your personal data, without prejudice to the situations determined by the law,
- Request notification of the transactions made in accordance with your rights in the form of correction, deletion, and destruction mentioned above, to third parties to whom personal data has been transferred,
- Object to the emergence of a result against you by analyzing your processed personal data exclusively with automated systems,
- Exercise your rights to demand compensation for your damage, if you suffer damage due to the processing of your personal data in violation of the relevant legislation.

