

## General Data Protection Regulation – GDPR Privacy Notice

We are aware that you care about how your information is used and shared, and we would like to thank you for your trust in us to do this carefully and logically. This Privacy Notice describes how we, Unifree Duty Free İşletmeciliği Anonim Şirketi (“**Unifree**”), collect and process your personal information through websites, devices, products, services, physical stores, and apps that refer to this Privacy Notice (together, the "Unifree Services").

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### 1. Unifree, the Data Controller

Unifree Duty Free İşletmeciliği A.Ş is the data controller of the personal data collected and processed through the Unifree Services.

### 2. What Personal Information Does Unifree Collect About Its Customers?

We collect your personal information to provide and continuously improve our products and services.

These are the types of information we collect:

**Information that you provide us:** We receive and store all information you provide us in connection with Unifree Services. For examples of the personal data we collect, please see **GDPR-UNF ANNEX 1 Examples of Collected Personal Data Table** annexed to this Privacy Notice. You can choose not to

provide certain information; however, in this case, you will not be able to enjoy some of the Unifree Services.

**Automatic Information:** We automatically collect and store certain types of information regarding your use of Unifree Services, including your interaction with the content and services offered through Unifree Services. Like many other websites, we use cookies and other unique identifiers, and we obtain certain types of information when your web browser or device accesses Unifree Services and other content on other websites offered by or on behalf of Unifree. For examples of the automatic information we collect, please see **GDPR-UNF ANNEX 1 Examples of Collected Personal Data Table**.

**Information From Other Sources:** We may receive information about you from other sources to correct our records and to present the results of your future transactions more easily and quickly. For examples of information we obtain from other sources, please see **GDPR-UNF ANNEX 1 Examples of Collected Personal Data Table**.

### **3. For What Purposes Does Unifree Process Your Personal Information?**

We process your personal information to operate, provide and improve the Unifree Services that we offer to our customers. These purposes include:

- **Purchase and delivery of products and services.** We use your personal information to provide products and services and communicate with you regarding orders, products, services, and promotional offers.
- **Provision, troubleshooting and improvement of Unifree Services.** We use your personal information to provide functionality, analyze performance, correct errors, and improve the usability and effectiveness of Unifree Services.
- **Recommendations and customization.** We use your personal information to recommend the features, products and services that may spark your interest, to identify your preferences, and customize your experience with Unifree Services.
- **Provision of voice, image and camera services.** When you use our voice, image and camera services, we process your voice input, images, videos and other personal information to respond to your request, provide the requested service and improve Unifree Services.
- **Compliance with legal obligations.** In some cases, we collect and use your personal information to comply with laws.
- **Communication.** We use your personal information to communicate with you regarding Unifree Services through different channels (for example, phone, email, chat).

- **Advertising.** We use your personal information to display interest-based ads for the features, products and services that may spark your interest. For more information, please see **GDPR-UNF ANNEX 2 Interest-Based Ads Notice**, which is annexed to this Privacy Notice.
- **Prevention of Information Security Violations.** We process the personal information of our customers in order to protect Unifree's partners and subsidiaries and to prevent and identify fraud and abuse.
- **Purposes for which we request your consent.** We may also request your consent to process your personal information for a specific purpose that we will communicate to you. When you give your consent for us to process your personal information for a specific purpose, then you may revoke your consent at any time, and we shall stop processing your information for that purpose.

#### **4. Cookies and Other Identifiers.**

We use cookies and other identifiers to improve your shopping experience, provide our services, understand how our customers use our services, and thereby make improvements and display ads. Approved third parties also use such tools in relation to our display of ads. We use cookies in order to allow our systems to recognize your browser or device and therefore provide you with Unifree Services. For more information about cookies and how we use them, please see **GDPR-UNF ANNEX 3 Cookie Notice**.

#### **5. Does Unifree Share Your Personal Information?**

Information about our customers is an important part of our business. Unifree shares customers' personal information only as described below and with the parties that either are subject to this Privacy Notice or follow practices at least as protective as those described herein.

**Third-party service providers:** We employ and assign other companies and individuals to perform the functions on our behalf. Examples include executing orders for products or services, sending postal mail and email, SMS sending, analyzing data, providing marketing assistance, processing payments, transmitting content and providing customer service. These third-party service providers may have access to the personal information necessary to perform their functions, but may not use it for other purposes. In addition, third parties must process personal information in accordance with this Privacy Notice, and as permitted by the applicable data protection laws.

**Business transfers:** As we continue to develop our business, we might sell or buy other businesses or services. In such transactions, customer information generally is one of the transferred business assets; however, considering the promises made in this Privacy Notice and, of course, unless the customer

approves otherwise, the sharing shall be realized. In addition, in contingencies such as purchasing all the assets of Unifree, customer information, of course, would be one of the transferred assets.

**Protection of persons and others within the European Union:** To enforce our Terms of Use and other agreements and to protect the rights, properties and security of our users and subsidiaries within the European Union, we share your account information and other information in circumstances in which we believe that disclosure is appropriate to comply with laws. This includes information exchanges with other companies and institutions for protection against fraud.

Other than the foregoing, you will receive a notification when information about you is shared with third parties, and you will have the opportunity to choose not to share such information.

**Transfers outside the European Economic Area and Turkey.** Whenever we transfer personal information to countries outside the European Economic Area and Turkey, we ensure that the information is transferred in accordance with this Privacy Notice as permitted by applicable data protection laws.

## **6. How Secure Is the Information About Me?**

We design our system with your security and privacy in mind.

- We strive to protect the security of your personal information during transfers by using encryption protocols and software.
- We follow the Payment Card Industry Data Security Standard (PCI DSS) when processing credit card data.
- We maintain physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of customers' personal information. Our security procedures mean we may ask you to verify your identity before we disclose your personal information.
- Our technological infrastructure uses maximum security measures to protect your information against unauthorized access or loss.
- It is important for you to protect against unauthorized access to your password and computers, devices, and apps. We advise you to use a unique password specific to your Unifree account that is not used for other online accounts. Be sure to sign off when you finish using a shared computer.

## **7. Advertising and Marketing Activities.**

- **Third-party advertisers and links to other websites:** Unifree Services may include third-party advertising and links to other websites and apps. Third-party advertising partners may collect

information about you when you interact with their content, advertising, and services. For more information about third-party advertising, including interest-based ads, please see **GDPR-UNF ANNEX 2 Interest-based Ads Notice**.

- **Use of third-party advertising services:** We furnish advertising companies with information that enables them to provide you with more useful and relevant Unifree ads and to measure their effectiveness. Under no circumstances will we share your name or other information that directly identifies you when we do this. Instead, we use advertising identifiers, such as cookies or other device identifiers. For example, if you have already downloaded one of our apps or are using any service on our website, we share the data regarding your advertising identifier so you will not see an ad to download the app again. Certain advertising companies may also use such information to offer you related ads from advertisers.

## **8. What Information Can I Access?**

For a list of examples you can access, please see **GDPR-UNF ANNEX 4 List of Accessible Data**.

## **9. What Rights Do I Have?**

By applying to our Company;

- To know whether your personal data is processed;
- If so, to request information regarding this;
- To know the processing purposes of personal data and whether these are used in compliance with their purposes; to know third parties to whom the personal data is transferred inside or outside the EU and/or Turkey; to request notification of transactions made by third parties to whom it is transferred;
- To request rectification if the personal data was processed incompletely or inaccurately; to request deletion or destruction if the grounds for processing no longer apply;
- To request notification of the procedures performed by the third parties to whom your personal data has been transferred;
- To object to any result that is to your detriment arising from the analysis of processed data through exclusively automated systems, and to request compensation for damage arising out of the processing of personal data contrary to the KVKK Law.
- In addition, as it is defined in the foregoing headings, you can choose not to provide certain information; however, in this case, you will not be able to enjoy some Unifree Services.

- You can add or update certain information to the pages, such as those referred to in the information that you can have access to. Once you update the information, we generally retain a copy of the former version for our records.
- If you do not want to receive any emails or other communications from us, please contact our **u|First Guest Relations**.
- If you do not want to see interest-based ads, please contact our **u|First Guest Relations**.
- The 'Help' feature on most browsers and devices will tell you how to prevent your browser or device from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to completely disable cookies. Because cookies allow you to take advantage of essential features of Unifree Services, we advise you to leave them enabled.
- You can give your consent for third-party ad cookies or revoke it.
- When you give your consent for us to process your personal information for a specific purpose, you may revoke that consent at any time, and we will stop processing your information for that purpose.

#### **10. Are Children Allowed to Use Unifree Services?**

Unifree may not sell products for purchase by children. It only sells children's products for purchase by adults. If you are under 18, you may use Unifree Services only with the participation of a parent or guardian.

#### **11. How Long Do We Retain Your Personal Information?**

We retain your personal information so you can use Unifree Services continuously, and as long as required to fulfill the purposes described in this Privacy Notice, as required by law, or to ensure that you remain using Unifree Services. For example, we retain your transaction history so you can review your former purchases, and so we can improve the relevance level of the feedback you provide us with and content.

#### **12. EU General Data Protection Regulation and Turkish Personal Data Protection Law – Legal Grounds**

EU GDPR and the Turkish Data Protection Law (KVKK Law) require legal grounds for us to use your personal data. Our means of legal compliance during the processing of your data vary depending on the specific purpose for which we use your personal information.

- Once we offer products and services or communicate with you about them, **we use the performance of an agreement**. This includes use of your personal information to receive and handle orders, offer products and services, and process payment.

- To protect our legitimate commercial interests and our customers' interests, we improve Unifree services (including when we use your voice, video or camera), identify fraud and abuse to ensure your security, and provide interest-based advertising management.
- **We use your explicit consent** when we ask for your consent to process your personal information for a specific purpose that we will communicate to you. When you give your consent for us to process your personal information for a specific purpose, you may revoke that consent at any time, and we will stop processing your information for that purpose.
- We use your personal information **to comply with binding legal obligations**.
- **Personal Data Protection Law No. 6698** - Unifree aims to process your personal data in accordance with the provisions of the Personal Data Protection Law No 6698 ("KVKK Law") and other legislation. The personal data that you have provided/will provide due to your utilization of services offered by our Company and/or that our Company obtains by any means, may be processed by our Company in the capacity of "Data Controller" for the purpose that requires your personal data to be processed in connection with, limited to, and proportionate with such purpose, in all ways specified in the KVKK Law, and may be subject to other procedures listed in the KVKK Law. For further information, please visit our [website](#)

### **13. Contacts, Notifications and Corrections**

If you have any privacy concerns or want to reach out to one of our data controllers, please contact us with a detailed explanation. We will strive to solve the problem for you. In addition, for the foregoing data controllers, you may reach the company at [informationsecurity@unifree.com.tr](mailto:informationsecurity@unifree.com.tr) You may file your complaint to our main supervisory authority, Personal Data Protection Board in Turkey, or any other local authority within the EU.

You should check our website frequently to see the latest changes in our Privacy Notices. Unless otherwise provided, our current Privacy Notice shall apply to all information we hold about you or your account. However, we stand behind the promises we make and will never make any material change to our policy and practices without the consent of affected customers to ensure the continued protection of customer data collected previously.