

Customer Privacy Notice

1. Introduction

Unifree Duty Free İşletmeciliği A.Ş. (hereinafter referred to as “**Unifree**” or the “**Company**”) is committed to protecting the confidentiality and security of your personal data. Pursuant to the Law No. 6698 on Protection of Personal Data Law No. 6698 (“**LPPD**”) and the European Union General Data Protection Regulation (“**GDPR**”), your personal data is under the protection of Unifree, acting as data controller under both LPPD and GDPR. The Company employs necessary technical and administrative measures, utilizing technological and infrastructural capabilities, to ensure the lawful processing and secure preservation of personal data within the framework of LPPD and GDPR.

2. Scope

Unifree provides airport shopping experiences at various airports. As Unifree, we collect data from international passengers who purchase products from duty-free stores operated by Unifree.

This privacy notice applies to customers who shop at Unifree's stores located in Istanbul Airport, Dalaman, Dereköy, and Kosovo. This notice is periodically reviewed and updated from time to time to ensure ongoing compliance and to reflect best practices.

This notice should be read in conjunction with our corporate LPPD Policy.

3. Identity of the Data Controller

Unifree acts as a data controller concerning the personal data it collects and processes about you during transactions. As data controller, Unifree is legally responsible for the processing of your personal data in accordance with LPPD and GDPR.

4. What Information Do We Collect About You?

4.1. Personal data refers to any information relating to an individual by which that person can be identified. In this context, we process, store, and use the following personal information about you:

- **Identity Data:** Name, surname, boarding pass number, passport number.
- **Contact Data:** Address details, email address, phone number.
- **Financial Data:** Invoice details, credit card information obtained via credit card terminals during transactions, receipt information.

- **Customer Transaction Data:** Information collected from customer complaints such as the method of contacting us, content of the complaint, order information, or request details.
- **Security Data:** CCTV camera images and audio recordings in stores.

5. How and By What Method Do We Collect Your Information?

We collect your personal information directly from you through the transactions carried out by you or your complaints and feedback. This information is collected either in person as hard copies or electronically through means such as email.

6. What Are the Purposes and Legal Grounds for Using Your Personal Information?

	Legal Ground	Purpose	Personal Data Categories
1.	Pursuant to Article 5/2-a of LPPD, we will process your personal data as it is explicitly stipulated by laws, and pursuant to Article 5/2-ç of LPPD, to fulfill our legal obligations. The provisions of the Customs Law No. 4458, the Customs Regulation covering the Customs Warehouse Regime, the Duty-Free Stores Regulation published in the Official Gazette dated 13.10.2006 and numbered 26318, and the Tax Procedure Law No. 213 are applied in the duty-free stores operated by our Company.	• Ensuring that sales are conducted in accordance with the provisions of the aforementioned legislation and the decisions and instructions of the authorized administrative authorities. • Managing security processes to fulfill legal obligations.	• Identity Information • Customer Transaction Information • Security Information
2.	Pursuant to Article 5/2-c of LPPD, we will process, store, and use your personal data when	• Processing payment information necessary to	• Identity Information • Contact Information

	necessary for the performance of a contract within the scope of the contractual relationship you will enter into with Unifree.	complete the transaction. Processing order details necessary to complete the transaction.	- Financial Information - Customer Transaction Information
3.	Pursuant to Article 5/2-ç of LPPD, we will process your personal data when necessary to fulfill our legal obligations.	- Maintaining financial records (payment receipts) for financial auditing - Collecting CCTV footage for the security of our stores and the prevention of crime.	- Identity Information - Financial Information - Security Information
4.	Pursuant to Article 5/2-f of LPPD, we will process your personal data in line with our legitimate interests, provided that it does not harm your fundamental rights and freedoms.	- Responding to legal requests and defending against them. - Verification of the accuracy of the people counting systems used in stores as part of a Proof-of-Concept study.	- Identity Information - Contact Information - Customer Transaction Information - Physical Premise Security Data

7. What Happens If the Purposes Specified Above Change?

We will only use your personal information for the purposes specified above unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will inform you and explain the legal basis for such processing.

8. What Happens If You Do Not Provide Your Personal Information?

Most of the information you provide is mandatory, while some are provided to us on a voluntary basis. To comply with GDPR and LPPD, we will inform you when you are required to provide certain information to us. We do not collect more information than necessary to achieve our specified purposes and do not retain such information longer than necessary.

If you do not provide the information when requested, we may not be able to perform the contract we have with you (such as providing you with our products or services). We may also be unable to fulfill our obligations under the contract or comply with our legal obligations (such as adhering to health and safety requirements or maintaining financial records).

9. Explicit Consent

When we process your special category of personal data, we may request your explicit consent. In such cases, we fulfill our obligation to inform you about the personal data to be processed and why we need them, allowing you to carefully evaluate whether you wish to give consent. The presence of your explicit consent is not a condition of your contractual relationship with us.

10. Automated Decision-Making

We do not employ automated decision-making methods in our procedures.

11. Who Can Access Your Personal Information?

11.1 Internal Operations: We may share your personal information within the company with accounting, finance, and business management departments for the purpose of carrying out our operational and commercial activities. If the information technology department needs to access certain files to fulfill its obligations, they may access your personal information provided that necessary measures are taken to protect your data.

11.2 Third-Party Access: We may share your personal information with third parties in accordance with Articles 8 and 9 of LPPD and the provisions of the Regulation on the Principles and Procedures for the Transfer of Personal Data Abroad. All third-party service providers are required to take appropriate administrative and technical measures to protect your personal information in line with our policies. We do not permit our third-party service providers to use your personal data for their own purposes; they are only allowed to process your personal data for specified purposes and in accordance with our instructions.

We share your personal information with the following third parties for the specified purposes:

Airport Civil Administration Authority, Free Zone Directorate, Customs	The provisions of the Customs Law No. 4458, the Customs Regulation	Under Article 5/2-a of LPPD, processing is necessary as it is explicitly
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Directorate, State Airports Authority, General Directorate of Security	covering the Customs Warehouse Regime, the Duty-Free Stores Regulation published in the Official Gazette dated 13.10.2006 and numbered 26318, and the Tax Procedure Law No. 213 are applied in the duty-free stores operated by our Company. Sales are conducted in accordance with the provisions of the aforementioned legislation and the decisions and instructions of the authorized administrative authorities.	stipulated by laws, and under Article 5/2-ç of LPPD, processing is mandatory for us to fulfill our legal obligations arising from the aforementioned regulations.
Legal Advisors	We receive third party legal support from a third party and may share your personal information with lawyers and advisors to make a claim or defend ourselves against a claim in the event of a dispute.	Under Article 5/2-e of LPPD, processing is mandatory for the establishment, exercise, or protection of a right.
Financial Advisors	We receive support from third parties for financial auditing purposes. We may share your receipt information with these advisors.	Under Article 5/2-ç of LPPD, processing is mandatory for us to fulfill our legal obligations arising from the aforementioned regulations.
Information and Technology Firms	We receive third-party support for our IT services, including information security. They may need access to certain information to fulfill their duties.	Under Article 5/2-f of LPPD, processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

12. How Long Will Unifree Retain Your Personal Information?

We will retain your personal information only for as long as necessary to fulfill the purposes outlined in this notice, including satisfying any legal and accounting requirements.

Your information is stored electronically and physically in our archives, on company servers, and within accounting programs.

13. What Are Your Data Protection Rights?

We respect your data protection rights and are committed to ensuring that your data is processed fairly and transparently. We want to ensure you are fully aware of all your rights regarding the protection of your personal data:

- 13.1. Right to Request Access:** You have the right to request access to your personal information and to obtain copies of it. We may charge a reasonable fee for this service.
- 13.2. Right to Request Rectification:** You have the right to request that we correct inaccurate personal information about you or complete any incomplete information.
- 13.3. Right to Request Erasure:** You have the right to request the restriction of processing of your personal information under certain conditions.
- 13.4. Right to Request Restriction of Processing:** You have the right to request the restriction of processing of your personal information under certain conditions.
- 13.5. Right to Object to Processing:** You have the right to object to the processing of your personal data under certain conditions.
- 13.6. Right to Request Data Portability:** You have the right to receive your personal information in a structured, commonly used, and machine-readable format and to transmit it to another controller under certain conditions.
- 13.7. Right to Lodge a Complaint with a Supervisory Authority:** You have the right to lodge a complaint with a supervisory authority.
- 13.8. Right to Withdraw Your Consent:** If you have provided consent for us to process your personal information for a specific reason, you have the right to withdraw your consent at any time by contacting us at KVKK@unifree.com.tr. Withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

14. How Will You Exercise Your Data Protection Rights?

If you wish to exercise any of your data protection rights or discuss any matter relating to this notice, you can contact us via our email address: KVKK@unifree.com.tr. We will respond to your requests within one month.

For more details about our data protection procedures, please refer to our Data Protection Policy at <https://www.unifree.com.tr/en/protection-of-personal-data>.

You can contact the Turkish Personal Data Protection Authority for more detailed information on data protection.