

FLAT-OWNER RESIDENT

CLARIFICATION POLICY REGARDING PERSONAL DATA PROTECTION

We, as Ağaoğlu Eltes Gold Residence Site Yönetimi, would like to inform you in accordance with the 10th Article of Personal Data Protection Law numbered 6698 (“PDPL”) as flat-owner who is a resident in Eltes Gold (“Flat-owner Resident”) about our identity, purpose of processing your data, to whom and why we transfer your data, our legal bases, our methods of processing and your rights.

- **Data Controller:** Ağaoğlu Eltes Gold Residence Site Yönetimi residing at Madenler Mahallesi Şehit Ünal Kalafat Caddesi No:32 Ümraniye/İstanbul (“Residential Administration”)

Your personal data are;

- being in **conformity with the law and good faith,**
- being **accurate and if necessary - up to date,**
- being **processed for specified, explicit and legitimate purposes,**
- being **relevant, limited and proportionate to the purposes** for which data are processed,
- being **stored only for the time designated by relevant legislation or necessitated by the purpose** for which data are collected.

Category of Personal Data	Type of Personal Data	Data Subject	Purpose of Processing	Legal Basis of Processing	Data Collection Method	Data Transfer
Identifying Data	Name Surname	Flat-owner Resident	Fulfilling our legal obligations arising from the Identity Reporting Law No. 1774	Processing of Name Surname data being mandatory in order us to fulfill our legal obligation of ‘reporting identity information of Data Subject to law enforcement agencies’ pursuant to the Identity Reporting Law No. 1774	Through filling family status notification form and submission of photocopy of the identity card to the Residential Administration, semi-automatically	It will be transferred to competent authorities in case of dispute, law enforcement agencies in order to fulfill our legal obligations and Ağaoğlu & group companies in order to collaborate in commercial activities
			Obtaining confirmation from Flat-owner Resident about moving in/out status of his/her tenant	Processing of Name Surname data being mandatory in order us to fulfill our legal obligation of ‘taking the necessary measures on behalf of the Flat-owner Resident for the protection of main property’ pursuant to the Property Ownership Law No. 364	Through writing on certain legal transactions, non-automatically	
			Making legal transactions between Residential Administration and Flat Owner Resident in accordance with the administration plan	Processing of Name Surname data, being mandatory for the establishment of rights arising from legal transactions between Residential Administration and Flat Owner Resident		

Identifying Data	Mother/ Father Name*	Flat-owner Resident	Fulfilling our legal obligations arising from the Identity Reporting Law No. 1774	Processing of this data being mandatory in order us to fulfill our legal obligation of 'reporting identity information of Data Subject to law enforcement agencies' pursuant to the Identity Reporting Law No. 1774	Through submission of photocopy of the identity card to the Residential Administration, semi-automatically	It will be transferred to law enforcement agencies in order to fulfill our legal obligations and Ağaoğlu & group companies in order to collaborate in commercial activities
Identifying Data	T.R. Identity Number	Flat-owner Resident	Fulfilling our legal obligations arising from the Identity Reporting Law No. 1774	Processing of T.R. Identity Number data being mandatory in order us to fulfill our legal obligation of 'reporting identity information of Data Subject to law enforcement agencies' pursuant to the Identity Reporting Law No. 1774	Through filling family status notification form and submission of photocopy of the identity card to the Residential Administration, semi-automatically	It will be transferred to law enforcement agencies in order to fulfill our legal obligations and Ağaoğlu & group companies in order to collaborate in commercial activities
Identifying Data	Passport Number	Foreign Flat-owner Resident	Fulfilling our legal obligations arising from the Identity Reporting Law No. 1774	Processing of Passport Number data being mandatory in order us to fulfill our legal obligation of 'reporting identity information of Data Subject to law enforcement agencies' pursuant to the Identity Reporting Law No. 1774	Through filling family status notification form and submission of passport information to the Residential Administration, semi-automatically	It will be transferred to law enforcement agencies in order to fulfill our legal obligations and Ağaoğlu & group companies in order to collaborate in commercial activities
Identifying Data	Blue Card Number	Flat-owner Resident Who Owns Blue Card	Fulfilling our legal obligations arising from the Identity Reporting Law No. 1774	Processing of Blue Card Number data being mandatory in order us to fulfill our legal obligation of 'reporting identity information of Data Subject to law enforcement agencies' pursuant to the Identity Reporting Law No. 1774	Through filling family status notification form and submission of blue card information to the Residential Administration, semi-automatically	It will be transferred to law enforcement agencies in order to fulfill our legal obligations and Ağaoğlu & group companies in order to collaborate in commercial activities
Identifying Data	Date of Birth	Flat-owner Resident	Fulfilling our legal obligations arising from the Identity Reporting Law No. 1774	Processing of Date of Birth data being mandatory in order us to fulfill our legal obligation of 'reporting identity information of Data Subject to law enforcement agencies' pursuant to the Identity Reporting Law No.1774	Through filling family status notification form and submission of photocopy of the identity card to the Residential Administration, semi-automatically	It will be transferred to law enforcement agencies in order to fulfill our legal obligations and Ağaoğlu & group companies in order to collaborate in commercial activities
Identifying Data	Place of Birth	Flat-owner Resident	Fulfilling our legal obligations arising from the Identity Reporting Law No. 1774	Processing of Place of Birth data being mandatory in order us to fulfill our legal obligation of 'reporting identity information of Data Subject to law enforcement agencies' pursuant to the Identity Reporting Law No. 1774	Through submission of photocopy of the identity card to the Residential Administration, semi-automatically	It will be transferred to law enforcement agencies in order to fulfill our legal obligations and Ağaoğlu & group companies in order to collaborate in commercial activities

Contact Data	Phone Number	Flat-owner Resident	Carrying out communication activities with Data Subject when necessary	Processing of Phone Number data with the purpose of carrying out communication activities with Data Subject, being mandatory for our legitimate interest	Through filling family status notification form and submission of contact details to the Residential Administration, semi-automatically	It will be transferred to authorized institution for SMS sending service in order to fulfill the obligations arising from electronic communication legislation, Ministry of Commerce and the Union of Chambers and Commodity Exchanges of Turkey in order to manage commercial electronic message consents and complaints through Message Management System (in Turkish İletim Yönetim Sistemi), security chiefs of security service provider companies and Ağaoğlu & group companies in order to collaborate in commercial activities
			Send commercial electronic message to Data Subject in accordance with his/her consent	Explicit and clarified consent of Data Subject		
Contact Data	E-mail Address	Flat-owner Resident	Carrying out communication activities with Data Subject when necessary	Processing of E-mail Address data with the purpose of carrying out communication activities with Data Subject, being mandatory for our legitimate interest	Through submission of contact details to the Residential Administration, semi-automatically	It will be transferred to Ministry of Commerce and the Union of Chambers and Commodity Exchanges of Turkey in order to manage commercial electronic message consents and complaints through Message Management System (in Turkish İletim Yönetim Sistemi), institution for E-mail sending service in order to send commercial electronic message and Ağaoğlu & group companies in order to collaborate in commercial activities
			Send commercial electronic message to Data Subject in accordance with his/her consent	Explicit and clarified consent of Data Subject		
Contact Data	Block/Apartment Number	Flat-owner Resident	Making legal transactions between Residential Administration and Flat-owner Resident in accordance with the administration plan	Processing of this data, being mandatory for the establishment of rights arising from legal transactions between Residential Administration and Flat-owner Resident	Through writing on certain legal transactions, non-automatically	It will be transferred to Ağaoğlu & group companies in order to collaborate in commercial activities

Contact Data	Address	Flat-owner Resident	Making legal notifications to Data Subject in cases where he/she does not live in the apartment constantly	Processing of Address data in order us make legal notifications to Data Subject, being mandatory for the protection of our right	Through filling family status notification form and submission of contact details, semi-automatically	It will be transferred to Ağaoğlu & group companies in order to collaborate in commercial activities
	Visual and Audial Recordings	Photograph	Flat-owner Resident	Matching Data Subject's identity information and visual recording in order to manage the entries and exits to and from the apartment and ensuring the apartment safety	Processing of Photograph data being mandatory in order us to fulfill our legal obligation of 'taking the necessary measures on behalf of the Flat-owner Resident for the protection of main property' pursuant to the Property Ownership Law No. 364	Through submission of photocopy of identity card to the Residential Administration, semi-automatically
Fulfilling our legal obligations arising from the Identity Reporting Law No. 1774				Processing of Photograph data being mandatory in order us to fulfill our legal obligation of 'reporting identity information of Flat-owner Resident to law enforcement agencies' pursuant to the Identity Reporting Law No. 1774	Through submission of photograph to the Residential Administration, semi-automatically	
Legal Transaction	Electricity Subscription Number	Flat-owner Resident Who Has Electricity Subscription	Confirming that Data Subject has concluded an electricity subscription contract	Processing of this data with the purpose of Confirming that Data Subject has concluded an electricity subscription contract, being mandatory for our legitimate interest	Through submission of electricity subscription contract to the Residential Administration, semi-automatically	It will be transferred to Ağaoğlu & group companies in order to collaborate in commercial activities
Other	Vehicle Information	Flat-owner Resident Who Owns Vehicle	Registering the vehicle to the system in order to managing the entries and exits of vehicles to and from the apartment and ensuring the apartment safety	Processing of this data being mandatory in order us to fulfill our legal obligation of 'taking the necessary measures on behalf of the Flat-owner Resident for the protection of main property' pursuant to the Property Ownership Law No. 364	Through submission of Vehicle Information to the Residential Administration, semi-automatically	It will be transferred to law enforcement agencies in order to fulfill our legal and Ağaoğlu & group companies in order to collaborate in commercial activities
	License Plate	Flat-owner Resident Who Owns Vehicle	Fulfilling our legal obligations arising from the Identity Reporting Law No. 1774	Processing of License Plate data being mandatory in order us to fulfill our legal obligation of 'reporting identity information of Flat-owner Resident to law enforcement agencies' pursuant to the Identity Reporting Law No. 1774	Through submission of License Plate information to the Residential Administration, semi-automatically	

Other	Date of Acquisition of Flat	Flat-owner Resident	Specifying the beginning date of Flat-owner Resident's rights within the scope of Property Ownership Law No. 364	Processing of this data, being mandatory for the establishment of Flat-owner Resident's rights arising from the Property Ownership Law No. 364	Through submission of Date of Acquisition of Flat information to the Residential Administration, semi-automatically	It will be transferred to competent authorities in case of dispute and Aġaoġlu & group companies in order to collaborate in commercial activities
			Specifying the beginning date of Flat-owner Resident's obligations	Processing of this data in order to specify the beginning date of Flat-owner Resident's obligations being mandatory for the protection of our right		
Other	Pet Ownership Information	Flat-owner Resident Who Owns Pet	Conforming that pets owned by Flat-owner Resident are compatible with the apartment administration plan and the Property Ownership Law No. 364	Processing of this data being mandatory in order us to fulfill our legal obligation of 'taking the necessary measures on behalf of the Flat-owner Resident for the protection of main property' pursuant to the Article 35/1-h of the Property Ownership Law No. 364	Through submission of Pet Ownership Information to the Residential Administration, semi-automatically	It will be transferred to Aġaoġlu & group companies in order to collaborate in commercial activities
Other	Signature	Flat-owner Resident	Determining Flat-owner Resident's declaration of intent in legal transactions made with the Residential Administration	Processing of Signature data in order us to determine Flat-owner Resident's declaration of intent, being mandatory for the protection of our right	Through writing on certain legal transactions, non-automatically	It will be transferred to competent authorities in case of dispute and Aġaoġlu & group companies in order to collaborate in commercial activities

*With regard to Name Surname data of Flat-owner Resident's Mother and Father that are transferred to us through photocopy of the identity card, Flat-owner Resident is a Data Controller and obliged to inform the data subjects in accordance with the 10th Article of PDPL. About the data transferred to us, we have an obligation to inform the data subjects in a reasonable period of time after collecting personal data in accordance with the 10th Article of PDPL and 6th Article (a) of Communique On Principles And Procedures To Be Followed In Fulfillment Of The Obligation To Inform.

Your rights may be summarized as follows:

You have the right to learn

- whether or not your personal data is being processed,
- the purpose of the processing and
- to whom your personal data is transferred domestically and internationally.

You have the right to request

- that your personal data should be processed in accordance with the purpose,
- rectification of personal data if processed incompletely or inaccurately,
- destruction upon disappearance of reasons which require the process,

- notification of the rectification or destruction to the third parties to whom personal data has been transferred and
- compensation for the damage arising from the unlawful processing.

You have the right to object

- to the processing, exclusively by automatic means of your personal data, which leads to an unfavorable consequence for you.

You may send us your request on using your above-mentioned rights, together with documents providing your identity and the scope of your request through below-mentioned manners:

- Sending an electronically signed or unsigned e-mail to **eltes.gold@agaoglu.com.tr**,
- Sending an e-mail to **eltesgold@hs03.kep.tr** Registered Electronic Mail (REM) address from your REM account with a secure electronic signature,
- Delivering by hand, by notary or by certified mail to **Madenler Mahallesi Şehit Ünal Kalafat Caddesi No:32 Ümraniye/İstanbul.**

We undertake to respond your request as soon as possible but not more than 30 (thirty) days, and without any charge, as long as there is no transaction cost.