

PERSONAL DATA PROTECTION AND PRIVACY POLICY

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DEFINITIONS

Explicit Consent	Consent on a specific subject, based on information and expressed with free will
Anonymization	Making personal data cannot be associated with an identified or identifiable natural person under any circumstances, even by matching with other data; Changing personal data in such a way that it loses its personal data nature and this situation cannot be reversed.
Application Form	The form presented in the annex of this Policy, which includes the application to be made by the Data Owners to exercise his rights within the framework of the relevant legislation
Website(s)	Any or all of the websites of Mars Sportif named www.macfit.com.tr , www.nuspa.com.tr , www.marsathletic.com
Business Partner	Real persons or legal entities with whom Mars Sportif has established business partnerships for purposes such as carrying out various projects or obtaining services, either personally or together with its shareholders or group companies while conducting its commercial activities
Personal Data	Any information relating to an identified or identifiable natural person
Processing of Personal Data	Any operation performed on personal data such as collection, recording, storage, retention, alteration, re-organisation, disclosure, transfer, acquisition, making available, classification or prevention of use of personal data by fully or partially automatic means or by non-automatic means provided that it is part of any data recording system
Personal Data with Special Features	Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data
Data Owner	Natural person whose personal data is processed
Data Processor	A natural or legal person who processes personal data on behalf of the data controller

	based on the authorization granted by the data controller
Data Controller	The natural or legal person who determines the purposes and means of processing personal data and manages the place where the data is kept systematically (data recording system)

ABBREVIATIONS

KVKK	Law No. 6698 on the Protection of Personal Data published in the Official Gazette dated April 7, 2016 and numbered 29677
KVK Board	Personal Data Protection Board
Mars Sportif/Company	Mars Sportif Tesisler İşletmeciliği A.Ş.
Politics	Personal Data Protection and Privacy Policy prepared and published by Mars Sportif Tesisler İşletmeciliği A.Ş.

PERSONAL DATA PROTECTION AND PRIVACY POLICY

I. INTRODUCTION

Mars Sportif Tesisler İşletmeciliği A.Ş. ("Mars Sportif") has the utmost sensitivity regarding the protection of personal data and its processing in accordance with the Law and legislation. In order to comply with the Personal Data Protection Law No. 6698 ("KVKK"), the Company fulfills the obligations regarding the processing, deletion, destruction, anonymization, transfer of personal data, enlightening the relevant person and ensuring data security by adopting the principles stipulated by the Personal Data Protection Board ("KVK Board"). This Personal Data Protection and Privacy Policy ("Policy") issued within this scope is made available to the Data Owner(s) whose personal data is processed.

Our Company attaches great importance to the protection of the personal data of our customers/members, business partners, shareholders, employees and other natural persons who contact/contract with us personally or as a representative of a company or organization and/or benefit from the services offered by us, and who establish a relationship with us by applying for a job, visiting our Websites, through our mobile applications or social media accounts, or in any other way.

Within this framework, as the Company, we have prepared this Policy in order to comply with the KVKK and other legislation and to explain our policy on the processing of personal data within the framework of the KVKK.

II. PURPOSE AND SCOPE

KVKK was published in the Official Gazette dated April 7, 2016 and numbered 29677. The KVKK is regulated to protect the fundamental rights and freedoms of natural persons whose personal data are processed, including the right to privacy, and to determine the obligations of natural and legal persons who process personal data.

The purpose of this Policy is to determine the management instructions, procedural requirements and to establish a technical and administrative policy in this regard in order to ensure that Mars Sportif processes and protects the personal data of the relevant persons in accordance with the KVKK.

This Policy applies to the activities carried out for the processing and protection of all personal data held by Mars Sportif in the capacity of "*Data Controller*" and/or "*Data Processor*". The Policy has been handled and prepared based on the KVKK and other legislation on the processing and protection of personal data.

This is Mars Sportif's;

- a. Methods and legal reasons for collecting Personal Data
- b. Which groups of persons' Personal Data are processed
- c. Which category of Personal Data is processed in relation to these groups of persons (Data Categories) and sample data types
- d. In which business processes and for what purposes this Personal Data is used
- e. Technical and administrative measures taken to ensure the security of Personal Data
- f. To whom and for what purpose Personal Data may be transferred
- g. Retention periods of Personal Data
- h. What are the rights of the Data Owner on their Personal Data and how they can use these rights
- i. How the Data Owners can change their positive or negative preferences for receiving electronic commercial messages
- j. Sharing Personal Data with public authorities

III. PERSONAL DATA

A. Definition of Personal Data

Within the framework of Article 3/I(d) of the KVKK, "*personal data*" refers to any information relating to an identified or identifiable natural person. In this context, anonymous information, anonymized information and other data that cannot be associated with a specific person are not considered personal data under this Policy.

B. General Principles for Processing Personal Data

Pursuant to Article 3/I(e) of the KVKK, any operation that may be performed on personal data, such as the acquisition, recording, storage, retention, alteration, reorganization, disclosure, transfer, acquisition, making available, classification or prevention of the use of personal data by fully or partially automatic means or by non-automatic means provided that it is part of any data recording system, falls within the scope of "*data processing*".

Mars Sportif processes personal data in accordance with the principles listed below:

- (i) Compliance with the law and good faith,
- (ii) Being accurate and up to date when necessary,
- (iii) Processing for specific, explicit and legitimate purposes,
- (iv) Being relevant, limited and proportionate to the purpose for which they are processed,
- (v) Retention for the period stipulated in the relevant legislation or required for the purpose for which they are processed.

In this context, your personal and/or special categories of personal data obtained by Mars Sportif and on behalf of Mars Sportif, Mars Sportif's branches/clubs, affiliated companies or through all kinds of channels including but not limited to websites, mobile applications and all kinds of channels in written, verbal or electronic media within the scope of KVKK and other legislation; your personal and/or special categories of personal data obtained within the scope of the KVKK and other legislation may be obtained, recorded, stored, preserved, maintained, modified, shared with other persons deemed appropriate by Mars Sportif for legal and statutory reasons or in line with the legal and actual requirements of the service provided by Mars Sportif and/or with the relevant third party natural person/legal entities in Turkey or abroad. It may be shared with real persons/legal entities in Turkey or abroad, and may be processed, including its transfer abroad.

C. Personal Data Processed by Mars Sportif

1. In General

Mars Sportif may process personal data and personal data with special features with the explicit consent of the Data Owners or without explicit consent in cases stipulated in Articles 5 and 6 of the KVKK.

Law No. 6502 on the Protection of Consumers, Regulation on Subscription Agreements issued by Mars Sportif, Regulation on Distance Contracts, Law No. 6563 on the Regulation of Electronic Commerce, Regulation on Private Physical Education and Sports Facilities, Labor Law No. 4857, Law No. 5510 on Social Security and General Health Insurance, Turkish Commercial Code No. 6102, Tax Procedure Law No. 213 and all other laws, regulations, communiqués and all other legal regulations related to these laws and personal data can be processed within the provisions specified in the relevant legislation.

2. Specifically

In the light of other legislation and in line with the principles set forth in this Policy and the legitimate interests of Mars Sportif, the Data Owners Groups that are/may be subject to data processing by Mars Sportif consist of Employee Candidate, Employee, Intern, Shareholder/Partner, Potential Product or Service Buyer, Supplier Employee, Supplier Official, Product or Service Buyer/Member, Online Visitor, Visitor data groups; and the personal data that may be processed by these Data Owners Groups are listed below:

1.	<p>Product or Service Recipient</p> <ul style="list-style-type: none"> a. Identity Information: Name, surname, Turkish ID Number, Gender, Nationality b. Location Information: GPS Information if authorized through the Mobile Application c. Contact Information: Phone Number, Address, Email, Social Media Username d. Customer Transaction Information: Call Center Records, Whatsapp correspondence, Purchased Service Information, Club usage (entry-exit) information, Call Center Records, Invoice, Request Information, Purchased Service Information, Reception Call Records, Shopping Information e. Physical Space Security: Entry and exit registration information, Security Camera Records f. Marketing Information: Shopping History Information, Advertising Forms, Information Obtained through Campaign Work, Cookie Records, User Information in Advertising Panels, Payment Records, Purchase, Service Fee Information, Reservation Day and Time Information, Current Membership Status Information g. Audio and Visual Recordings: Photograph (if uploaded by the member via the Mobile Application) h. Transaction Security: IP Address Information, Website Login and Logout Information, Membership Portal Login Information i. IBAN Number for refund transactions in cases where the credit card is not refunded
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	<p>j. Legal Action: Consumer Arbitration Committee Applications, Consumer Court Decisions, Consumer Arbitration Committee File Content, Consumer Case File Content Information</p> <p>k. Health Information: Questionnaire answers regarding health information for Nutrition Counseling Service, Body Measurement Information, Pre-Service Health Questionnaire Answers, Information on disability status to benefit from special campaigns, health</p>
2.	<p>Potential Product or Service Buyer/ Site Member</p> <p>a. Identity Information: Name-Surname, Turkish ID Number, Age, Date of Birth, Gender</p> <p>b. Contact Information: Phone Number, Email, Address</p> <p>c. Transaction Security Information: IP Address Information, Website Login and Logout Information</p> <p>d. Marketing Information: Advertisement Forms, Information Obtained through Campaign Work, Cookie Records, Cookies, User Information in Advertisement Panels</p>
3.	<p>Visitor</p> <p>a. Contact Phone Number, Email</p> <p>b. Physical Space Security: Entry and Exit Records, Security Camera Records</p>
4.	<p>Online Visitors/Visitors</p> <p>a. Transaction Security Information: IP Address Information, Website Login and Logout Information</p>
5.	<p>Employee Data/Intern Data</p> <p>a. Identity Information: Name-Surname, Date of Birth, Place of Birth, Turkish ID Number, Mother, Father's Name, Marital Status, Identity Card Serial Number, Civil Registration Sample, Nationality, Marital Status</p> <p>b. Contact Information: Phone Number, Email, Address</p> <p>c. Personnel Information: Disciplinary Investigation, Performance Evaluation Report, Employment Document Records</p>

	<ul style="list-style-type: none"> d. Physical Space Security: Workplace Entry and Exit Records, Security Camera Records e. Professional Experience Information: Diploma Information, Courses Attended, On-the-Job Training Information, Certificates, Diploma Score f. Audiovisual Recordings: Digital Training Content, Photography and Digital Interview Content g. Health Information: Health Report, Information on disability status, Blood type information, Personal health information in the health report in the personal file h. Criminal Conviction and Security Measures: Criminal Record i. Legal Action: Case File Information, Salary Garnishment Deduction Information, Party and File Content Information Subject to Case Files, Information notified via e-notification j. Finance Info: Bank IBAN Number
6.	<p>Employee Candidate Data</p> <ul style="list-style-type: none"> a. Identity Information: Name, Surname, Turkish ID Number, Date of Birth, Nationality, Marital Status b. Contact Information: Email Address, Phone Number, Address Information c. Physical Space Security: Camera recordings during job interviews at branches and headquarters d. Professional Experience Information: Diploma Information, Courses Attended, On-the-Job Training Information, Certificates, Diploma Score e. Audiovisual Recordings: Photographs, Digital Interview Recordings f. Health Information: Information on Disability Status, Blood Type Information, Personal Health Information in the Health Report in the Personal File
7.	<p>Shareholder/Partner Data</p> <ul style="list-style-type: none"> a. Identity Information: Name-Surname, Turkish ID Number, Date of Birth b. Contact Information: Phone Number, Email
8.	<p>Supplier Employee</p>

	<ul style="list-style-type: none"> a. Identity Information: Name-Surname, Turkish ID Number, Date of Birth b. Contact Information: Phone Number, Email, Address c. Criminal Conviction and Security Measures: Criminal Record d. Personnel Employment Certificate, SSI Service Transcript e. Professional Experience Information: Vocational Qualification Certificate f. Health Health Report
	<p>Supplier Officer</p> <ul style="list-style-type: none"> a. Identity Information: Name-Surname, Turkish ID Number, Date of Birth b. Contact Information: Phone Number, Email, Address c. Financial Information Bank IBAN Number
9.	<p>Personal Trainer</p> <ul style="list-style-type: none"> a. Identity Information: Name-Surname, Turkish ID Number, Date of Birth, Gender, b. Contact Information: Phone number, E-mail address, Address, GSM Information c. Financial Information: Bank IBAN Information, Tax Certificate d. Professional Experience Information: Diploma Information, Courses attended, On-the-job training information, Certificates, Transcript e. Audio and Visual Recordings: Exercise Videos and Photos, Digital Training Content, Photographs f. Size Information: Clothing Size, Shoe Size g. Physical Space Security: Entry and Exit Records, Security Camera Records h. Legal Action: Case File Information, Salary Garnishment Deduction Information, Party and File Content Information Subject to Case Files, Information notified via e-notification i. Criminal Conviction and Security Measures: Criminal Record j. Health: Health Report

IV. Purposes of Processing Personal Data

1. In General

Identity Information

- Execution of Emergency Management Processes
- Execution of Information Security Processes
- Execution of Employee Candidate / Intern / Student Selection and Placement Processes
- Execution of Employee Candidate Application Processes
- Execution of Employee Satisfaction and Loyalty Processes
- Fulfillment of Obligations Arising from Employment Contract and Legislation for Employees
- Execution of Fringe Benefits and Benefits Processes for Employees
- Conducting Audit / Ethics Activities
- Conducting Training Activities
- Execution of Access Authorizations
- Execution of Activities in Compliance with the Legislation
- Execution of Company / Product / Service Loyalty Processes
- Ensuring Physical Space Security
- Execution of Assignment Processes
- Follow-up and Execution of Legal Affairs
- Conducting Internal Audit / Investigation / Intelligence Activities
- Execution of Communication Activities
- Planning Human Resources Processes
- Execution / Supervision of Business Activities
- Execution of Occupational Health / Safety Activities
- Receiving and Evaluating Suggestions for Improvement of Business Processes
- Execution of Business Continuity Ensuring Activities
- Execution of Logistics Activities
- Execution of Goods / Service Procurement Processes
- Execution of Goods / Services After Sales Support Services
- Execution of Goods / Service Sales Processes
- Execution of Goods / Services Production and Operation Processes
- Execution of Customer Relationship Management Processes
- Execution of Activities for Customer Satisfaction
- Organization and Event Management
- Conducting Marketing Analysis Studies
- Execution of Performance Evaluation Processes
- Execution of Advertising / Campaign / Promotion Processes
- Execution of Risk Management Processes
- Execution of Storage and Archive Activities
- Execution of Social Responsibility and Civil Society Activities
- Execution of Contract Processes
- Execution of Strategic Planning Activities
- Tracking Requests / Complaints

- Execution of Supply Chain Management Processes
- Execution of Wage Policy
- Execution of Marketing Processes of Products / Services
- Ensuring the Security of Data Controller Operations
- Execution of Investment Processes
- Execution of Talent / Career Development Activities
- Foreign Personnel Work and Residence Permit Procedures
- Providing Information to Authorized Persons, Institutions and Organizations

Contact Information

- Execution of Emergency Management Processes
- Execution of Information Security Processes
- Execution of Employee Candidate / Intern / Student Selection and Placement Processes
- Execution of Employee Candidate Application Processes
- Execution of Employee Satisfaction and Loyalty Processes
- Fulfillment of Obligations Arising from Employment Contract and Legislation for Employees
- Execution of Fringe Benefits and Benefits Processes for Employees
- Conducting Audit / Ethics Activities
- Conducting Training Activities
- Execution of Access Authorizations
- Execution of Activities in Compliance with the Legislation
- Execution of Company / Product / Service Loyalty Processes
- Execution of Assignment Processes
- Follow-up and Execution of Legal Affairs
- Conducting Internal Audit / Investigation / Intelligence Activities
- Execution of Communication Activities Planning Human Resources Processes
- Execution / Supervision of Business Activities
- Execution of Occupational Health / Safety Activities
- Receiving and Evaluating Suggestions for Improvement of Business Processes
- Execution of Business Continuity Ensuring Activities
- Execution of Logistics Activities
- Execution of Goods / Service Procurement Processes
- Execution of Goods / Services After Sales Support Services
- Execution of Goods / Service Sales Processes
- Execution of Goods / Services Production and Operation Processes
- Execution of Customer Relationship Management Processes
- Execution of Activities for Customer Satisfaction
- Organization and Event Management
- Conducting Marketing Analysis Studies
- Execution of Performance Evaluation Processes
- Execution of Advertising / Campaign / Promotion Processes
- Execution of Risk Management Processes
- Execution of Storage and Archive Activities

- Execution of Social Responsibility and Civil Society Activities
- Execution of Contract Processes
- Execution of Strategic Planning Activities
- Tracking Requests / Complaints
- Execution of Supply Chain Management Processes
- Execution of Wage Policy
- Execution of Marketing Processes of Products / Services
- Ensuring the Security of Data Controller Operations
- Execution of Investment Processes
- Execution of Talent / Career Development Activities
- Providing Information to Authorized Persons, Institutions and Organizations
- Foreign Personnel Work and Residence Permit Procedures
- Creating and Tracking Visitor Records

Location Information

- Execution of Communication Activities
- Execution/Supervision of Business Activities
- Execution of Activities for Customer Satisfaction
- Conducting Marketing Analysis Studies

Personal Information

- Execution of Emergency Management Processes
- Fulfillment of Obligations Arising from Employment Contract and Legislation for Employees
- Execution of Fringe Benefits and Benefits Processes for Employees
- Conducting Audit / Ethics Activities
- Conducting Training Activities
- Execution of Activities in Compliance with the Legislation
- Execution of Assignment Processes
- Follow-up and Execution of Legal Affairs
- Conducting Internal Audit / Investigation / Intelligence Activities
- Planning Human Resources Processes
- Execution / Supervision of Business Activities
- Execution of Occupational Health / Safety Activities
- Execution of Logistics Activities
- Execution of Goods / Service Procurement Processes
- Organization and Event Management
- Execution of Performance Evaluation Processes
- Execution of Storage and Archive Activities
- Execution of Contract Processes
- Follow-up of Requests / Complaints
- Execution of Supply Chain Management Processes
- Execution of Wage Policy
- Ensuring the Security of Data Controller Operations

<ul style="list-style-type: none"> - Providing Information to Authorized Persons, Institutions and Organizations
<p>Legal Process Knowledge</p> <ul style="list-style-type: none"> - Managing Emergency Management Processes - Fulfillment of Obligations Arising from Employment Contract and Legislation for Employees - Execution of Fringe Benefits and Benefits Processes for Employees - Conducting Audit / Ethics Activities - Follow-up and Execution of Legal Affairs - Conducting Internal Audit / Investigation / Intelligence Activities - Planning Human Resources Processes - Execution / Supervision of Business Activities - Execution of Occupational Health / Safety Activities - Execution of Business Continuity Ensuring Activities - Managing Contract Processes - Providing Information to Authorized Persons, Institutions and Organizations
<p>Customer Transaction Information</p> <ul style="list-style-type: none"> - Execution of Information Security Processes - Execution of Access Authorizations - Execution of Activities in Compliance with the Legislation - Execution of Communication Activities - Execution of Goods / Services After Sales Support Services - Execution of Goods / Service Sales Processes - Execution of Customer Relationship Management Processes - Execution of Activities for Customer Satisfaction - Conducting Marketing Analysis Studies - Execution of Advertising / Campaign / Promotion Processes - Execution of Risk Management Processes - Execution of Storage and Archive Activities - Execution of Contract Processes - Execution of Marketing Processes of Products / Services - Ensuring the Security of Data Controller Operations - Execution of Investment Processes
<p>Knowledge of Physical Space Security</p> <ul style="list-style-type: none"> - Execution of Emergency Management Processes - Execution of Information Security Processes - Fulfillment of Obligations Arising from Employment Contract and Legislation for Employees - Execution of Fringe Benefits and Benefits Processes for Employees - Conducting Audit / Ethics Activities - Execution of Access Authorizations - Execution of Activities in Compliance with the Legislation

- Execution of Company / Product / Service Loyalty Processes
- Ensuring Physical Space Security
- Follow-up and Execution of Legal Affairs
- Conducting Internal Audit / Investigation / Intelligence Activities
- Execution of Communication Activities
- Planning Human Resources Processes
- Execution / Supervision of Business Activities
- Execution of Occupational Health / Safety Activities
- Execution of Business Continuity Ensuring Activities
- Execution of Goods / Service Sales Processes
- Execution of Activities for Customer Satisfaction
- Organization and Event Management
- Conducting Marketing Analysis Studies
- Execution of Performance Evaluation Processes
- Execution of Advertising / Campaign / Promotion Processes
- Execution of Risk Management Processes
- Execution of Storage and Archive Activities
- Managing Contract Processes
- Follow-up of Requests/Complaints
- Execution of Wage Policy
- Execution of Marketing Processes of Products / Services
- Ensuring the Security of Data Controller Operations
- Providing Information to Authorized Persons, Institutions and Organizations

Transaction Security Information

- Execution of Information Security Processes
- Execution of Activities in Compliance with the Legislation
- Execution of Company / Product / Service Loyalty Processes
- Execution of Communication Activities
- Execution of Goods / Services After Sales Support Services
- Execution of Customer Relationship Management Processes
- Conducting Marketing Analysis Studies
- Execution of Advertising/Campaign/Promotion Processes
- Execution of Risk Management Processes
- Managing Storage and Archive Activities
- Tracking Requests / Complaints
- Execution of Marketing Processes of Products / Services
- Ensuring the Security of Data Controller Operations
- Providing Information to Authorized Persons, Institutions and Organizations

Finance Information

- Execution of Activities in Compliance with the Legislation
- Execution / Supervision of Business Activities

- Execution of Storage and Archive Activities
- Execution of Contract Processes

Professional Experience Information

- Execution of Emergency Management Processes
- Execution of Information Security Processes
- Execution of Employee Candidate / Intern / Student Selection and Placement Processes
- Execution of Employee Candidate Application Processes
- Fulfillment of Obligations Arising from Employment Contract and Legislation for Employees
- Conducting Audit / Ethics Activities
- Conducting Training Activities
- Execution of Activities in Compliance with the Legislation
- Execution of Assignment Processes
- Monitoring and Execution of Legal Affairs
- Conducting Internal Audit / Investigation / Intelligence Activities
- Planning Human Resources Processes
- Execution / Supervision of Business Activities
- Execution of Occupational Health / Safety Activities
- Receiving and Evaluating Suggestions for Improvement of Business Processes
- Execution of Business Continuity Ensuring Activities
- Execution of Logistics Activities
- Execution of Goods / Service Procurement Processes
- Execution of Goods / Services Production and Operation Processes
- Execution of Performance Evaluation Processes
- Execution of Risk Management Processes
- Execution of Storage and Archive Activities
- Managing Contract Processes
- Execution of Supply Chain Management Processes
- Managing Wage Policy
- Ensuring the Security of Data Controller Operations
- Execution of Talent / Career Development Activities
- Providing Information to Authorized Persons, Institutions and Organizations

Marketing Information

- Execution of Information Security Processes
- Execution of Access Authorizations
- Execution of Activities in Compliance with the Legislation
- Execution of Company / Product / Service Loyalty Processes
- Managing Communication Activities
- Managing Goods/Service Sales Processes
- Conducting Marketing Analysis Studies

- Execution of Advertising/Campaign/Promotion Processes
- Execution of Risk Management Processes
- Execution of Storage and Archive Activities
- Execution of Strategic Planning Activities
- Execution of Wage Policy
- Execution of Marketing Processes of Products / Services
- Ensuring the Security of Data Controller Operations
- Execution of Investment Processes

Audiovisual Recordings

- Execution of Information Security Processes
- Execution of Employee Candidate / Intern / Student Selection and Placement Processes
- Execution of Employee Candidate Application Processes
- Execution of Employee Satisfaction and Loyalty Processes
- Fulfillment of Obligations Arising from Employment Contract and Legislation for Employees
- Execution of Fringe Benefits and Benefits Processes for Employees
- Conducting Audit / Ethics Activities
- Conducting Training Activities
- Execution of Access Authorizations
- Execution of Activities in Compliance with the Legislation
- Conducting Internal Audit / Investigation / Intelligence Activities
- Planning Human Resources Processes
- Execution / Supervision of Business Activities
- Receiving and Evaluating Suggestions for Improvement of Business Processes
- Execution of Goods / Service Procurement Processes
- Execution of Goods / Service Sales Processes
- Execution of Goods / Services Production and Operation Processes
- Organization and Event Management
- Execution of Performance Evaluation Processes
- Execution of Risk Management Processes
- Execution of Storage and Archive Activities
- Execution of Contract Processes
- Ensuring the Security of Data Controller Operations
- Execution of Talent, Career Development Activities

Health Information

- Execution of Emergency Management Processes

- Execution of Employee Candidate / Intern / Student Selection and Placement Processes
- Execution of Employee Candidate Application Processes
- Fulfillment of Obligations Arising from Employment Contract and Legislation for Employees
- Execution of Fringe Benefits and Benefits Processes for Employees
- Conducting Audit / Ethics Activities
- Execution of Access Authorizations
- Execution of Activities in Compliance with the Legislation
- Planning Human Resources Processes
- Execution / Supervision of Business Activities
- Execution of Occupational Health / Safety Activities
- Receiving and Evaluating Suggestions for Improvement of Business Processes
- Execution of Goods / Services After Sales Support Services
- Execution of Goods / Service Sales Processes
- Organization and Event Management
- Execution of Risk Management Processes
- Execution of Storage and Archive Activities
- Managing Contract Processes
- Follow-up of Requests/Complaints
- Ensuring the Security of Data Controller Operations
- Providing Information to Authorized Persons, Institutions and Organizations

Criminal Conviction and Security Measures

- Fulfillment of Obligations Arising from Employment Contract and Legislation for Employees
- Execution of Activities in Compliance with the Legislation
- Planning Human Resources Processes
- Conducting Audit / Ethics Activities
- Execution of Activities in Compliance with the Legislation
- Monitoring and Execution of Legal Affairs
- Conducting Internal Audit / Investigation / Intelligence Activities
- Execution of Occupational Health / Safety Activities
- Execution of Business Activities/Supervision
- Execution of Storage and Archive Activities
- Execution of Contract Processes
- Follow-up of Requests/Complaints
- Ensuring the Security of Data Controller Operations

Body Knowledge

- Execution of Goods/Service Procurement Processes
- Execution of Contract Processes

2. Specifically

In addition to the purposes stated above, Mars Sportif may process personal data for the purposes specifically stated below and may be retained for the period required by these purposes and in any case for the periods required by legal legislation:

- (i) Fulfillment of legal and administrative obligations,
- (ii) Negotiation, establishment and performance of contracts concluded/intended to be concluded,
- (iii) Providing and developing the services requested by the members effectively, creating and organizing the personal account of the member through the website and managing membership transactions through the personal account, informing members and customers about campaigns and opportunities or providing prices, marketing, other opportunities, offers and information regarding the services provided,
- (iv) Ensuring the security of Mars Sportif's website and other electronic systems, social media accounts and physical environments,
- (v) Promotion and marketing of Mars Sportif's services and their development, obtaining the opinion of the Data Owners through surveys and polls,
- (vi) Ensuring entry and exit security, preventing foreign and illegal entries,
- (vii) Birthday celebration, inclusion in sweepstakes, campaigns or competitions, gift giving and other similar events, promotions and campaigns in favor of the Data Owners,
- (viii) Investigation, detection, prevention and reporting of breaches of contract and law to the relevant administrative or judicial authorities,
- (ix) Resolution of existing and future legal disputes,
- (x) Responding to requests and questions,
- (xi) Realization of company and partnership law transactions,
- (xii) Conducting recruitment processes within the framework of human resources policies,
- (xiii) Evaluating and finalizing the eligibility of job applications and contacting job applicants,
- (xiv) Data processing is mandatory for the establishment, exercise or protection of a right,
- (xv) Protecting the legitimate interests of Mars Sportif, provided that the fundamental rights and freedoms of the Data Owners are not harmed.

V. Transfer of Personal Data within and outside Turkey

1. In General

Provided that Mars Sportif complies with the general principles listed in the KVKK and the conditions stipulated in Articles 8 and 9 of the KVKK and takes the necessary security

measures, Mars Sportif may transfer the personal data provided to third parties in Turkey and abroad and process and store them on servers or other electronic media located in Turkey and abroad for the purposes specified in this Policy. Although the third parties to whom personal data may be transferred may vary depending on various factors such as the type (membership relationship, business relationship, etc.) and nature of the relationship between the Data Owners and Mars Sportif, they are generally as shown below:

- (i) Mars Sportif Group Companies,
- (ii) Depository institutions, platform owners, data broadcasting organizations, infrastructure providers and other business partners, suppliers and subcontractors that Mars Sportif works with in Turkey and abroad,
- (iii) All kinds of official authorities and institutions,
- (iv) Banks and/or institutions authorized for collection purposes and domestic/international organizations and other relevant third parties with which the relevant activity is carried out for these purposes.

2. To whom and for what purpose Personal Data may be transferred

Mars Sportif transfers personal data to third parties only for the purposes specified in this Policy and in accordance with Articles 8 and 9 of the KVKK. In this context, the processed Customer/Member data and the person to whom the purchased service will be performed are shared with shareholders, suppliers, public institutions and organizations, subsidiaries and affiliates, and this data can also be accessed by the call center when necessary.

Customer/Member data is also shared with the commercial electronic message intermediary service provider in order to promote, advertise, offer benefits and opportunities in line with the shopping preferences, tastes and habits of the customer/member in line with the commercial electronic message approval of the customer/member.

Website and mobile applications usage preferences and browsing history are shared with third parties that provide cookie services in order to communicate with the Customer/Member in line with their tastes and preferences. Personal data transfers realized within this scope are realized through the secure environment and channels provided by the relevant third party.

In the process of processing personal data and subjecting them to domestic and international transfer, in addition to the implementation of the technical measures specified in this article to ensure the security of personal data, Mars Sportif also provides legal and contractual protection of the security of data within the framework of the provisions of the KVKK in the contracts concluded with third parties.

VI. Method of Collection of Personal Data

Mars Sportif may obtain personal data in written, verbal, audio or video recording or other physical or electronic forms for the purposes specified in this Policy within the framework of the conditions set forth in Articles 5 and 6 of the KVKK. In addition, personal data may also be collected through channels such as headquarters, branches and other physical environments of Mars Sportif, call centers, websites, mobile applications, electronic transaction platforms, social media and other public channels or events organized, sales and marketing units, customer forms, digital marketing, contracts, applications, forms, offers, cookies used during website visits.

VII. Retention Period of Personal Data

Except in cases where longer retention is required or permitted by law, Mars Sportif, this Policy and the Annex- In line with the purposes set out in the Personal Data Retention and Destruction Policy, it retains the personal data it obtains and processes in accordance with the KVKK for the periods specified in the KVKK and other special laws.

In the event that the purpose of processing personal data expires and the retention periods determined by Mars Sportif in accordance with the KVKK and other legislation and other legislation expire, personal data are stored only as evidence in possible legal disputes, in order to assert the relevant right related to personal data and / or to establish a defense or submit it if requested by competent official authorities. In determining the aforementioned periods, the statute of limitations and retention periods determined in the relevant legislation for the assertion of the aforementioned right are taken as basis. In this case, does not access the stored personal data for any other purpose and access to the relevant personal data is provided only when it is required to be used in the relevant legal dispute.

The specified periods are meticulously monitored by Mars Sportif and personal data that are found to have expired the aforementioned retention periods are again and Personal Data is deleted, destroyed or anonymized by Mars Sportif in accordance with the KVKK as detailed in the Annex- Personal Data Retention and Destruction Policy.

The Cookie Policy should be reviewed regarding the retention periods of personal data obtained through cookies.

VIII. Security and Control of Personal Data

Within the framework of Article 12 of the KVKK, Mars Sportif, as the "data controller", takes the necessary technical and administrative measures to ensure the appropriate level of security in order to prevent unlawful processing of personal data and unlawful access to data and to

ensure the protection of personal data. For this purpose, (i) activities are carried out in accordance with the internal policies and rules prepared for the protection of personal data, (ii) employees are provided with the necessary training and responsibilities regarding the personal data protection legislation and the internal policies and rules prepared in this direction, (iii) all necessary declarations and commitments are obtained from employees and persons and institutions that process data on behalf of Mars Sportif for the confidentiality and protection of data, (iv) necessary information security measures are implemented to ensure the security of personal data inside and outside the company and to prevent unauthorized access to data, (v) compliance with the internal policies and rules established for the protection of personal data is ensured, (vi) the adequacy of the measures taken is checked and new data security systems are procured and/or existing data security systems are developed and updated according to the needs and opportunities and necessary audits are carried out in this regard.

IX. Technical and Administrative Measures Taken by Mars Sportif for the Protection and Security of Personal Data

Mars Sportif undertakes to take all necessary technical and administrative measures and exercise due diligence to ensure the confidentiality and security of your personal data.

Mars Sportif takes necessary measures to prevent unauthorized access, misuse, unlawful processing, disclosure, alteration or destruction of personal data. Mars Sportif uses generally accepted security technology standards such as firewalls and Secure Socket Layer (SSL) encryption when processing personal data. In addition, SSL is used when sending personal data to Mars Sportif through its website, mobile application and mobile site.

Mars Sportif takes the following data security measures to prevent unlawful access to the personal data it processes, to prevent unlawful processing of such data and to ensure the protection of personal data;

- Network security and application security are ensured,
- Closed system network is used for personal data transfers through the network,
- Key management is in place,
- Security measures are taken within the scope of procurement, development and maintenance of information technology systems,
- The security of personal data stored in the cloud is ensured,
- There are disciplinary regulations for employees that include data security provisions,
- Training and awareness raising activities on data security are carried out for employees at regular intervals,
- Authorization matrix has been created for employees,
- Access logs are kept regularly,
- Corporate policies on access, information security, use, storage and disposal have been prepared and implemented,
- Data masking measures are applied when necessary,

- Confidentiality commitments are made,
- Employees who are reassigned or leave their jobs are de-authorized in this area,
- Up-to-date anti-virus systems are used,
- Firewalls are used,
- The signed contracts contain data security provisions,
- Extra security measures are taken for personal data transferred via paper and the relevant document is sent in the format of a confidential document,
- Personal data security policies and procedures have been determined,
- Personal data security issues are reported quickly,
- Personal data security is monitored,
- Necessary security measures are taken regarding entry and exit to physical environments containing personal data,
- Physical environments containing personal data are secured against external risks (fire, flood, etc.),
- Security of environments containing personal data is ensured,
- Personal data is minimized as much as possible,
- Personal data is backed up and the security of backed up personal data is also ensured.
- User account management and authorization control system are implemented and monitored.
- Internal periodic and/or random audits are conducted and commissioned.
- Log records are kept without user intervention.
- Existing risks and threats have been identified.
- Protocols and procedures for the security of Personal Data with Special Features have been determined and implemented.
- If Personal Data with Special Features is to be sent via electronic mail, it is sent encrypted and using a KEP or corporate mail account.
- Secure encryption/cryptographic keys are used for Personal Data with Special Features and managed by different units.
- Intrusion detection and prevention systems are used.
- Cyber security measures have been taken and their implementation is constantly monitored.
- Encryption is performed.
- Penetration test is applied.
- Personal Data with Special Features transferred on portable memory sticks, CDs and DVDs are encrypted.
- Data processing service providers are periodically audited on data security.
- Awareness of data processing service providers on data security is ensured.
- Data loss prevention software is used.

Despite the Company taking the necessary information security measures, in the event that personal data is damaged as a result of attacks on the platforms operated by the Company or the Company system without any fault of the Company or in the hands of unauthorized third

parties, the Company will immediately notify the data owner and the Personal Data Protection Board and take the necessary measures.

X. Rights of the Data Owners within the Framework of KVKK

Pursuant to Article 11 of the KVKK, the Data Owners has the following rights on personal data processed by Mars Sportif:

- a. Learn whether their personal data is being processed,
- b. Request information if their personal data has been processed,
- c. Learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- d. To know the third parties to whom personal data are transferred domestically or abroad,
- e. To request correction of personal data in case of incomplete or incorrect processing,
- f. To request the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of the KVKK,
- g. Request notification of the transactions made pursuant to subparagraphs (d) and (e) to third parties to whom personal data are transferred,
- h. To object to the occurrence of a result against you by analyzing the processed data exclusively through automated systems,
- i. In case of damage due to unlawful processing of personal data, to demand compensation for the damage,

In case the Data Owners wish to exercise any of the above-mentioned rights, they are required to fill in the application form attached to this Policy and submit a wet signed copy of the form together with the information and documents that will identify their identity to the nearest branch address by personal application or via notary public. In the event that the Personal Data Protection Board decides to submit the requests by methods other than those mentioned above, the ways in which the applications can be submitted will be announced separately.

Mars Sportif will evaluate and finalize the requests duly received from Data Owners as soon as possible and in any case within 30 (thirty) days at the latest depending on the nature of the request within the framework of Article 13 of the KVKK

Although the requests of Data Owners will be finalized free of charge as a rule, if the response to the request requires an additional cost, a fee may be charged in the amounts determined within the framework of the relevant legislation.

XI. USE AND MANAGEMENT OF COOKIES

For detailed information about the cookies used by Mars Sportif, cookie types, purposes, storage periods and cookie management, you should review the Cookie Policy.

XII. SITES, PRODUCTS AND SERVICES OF THIRD PARTIES

Mars Sportif's websites, platforms and applications may contain links to third party websites, products and services. Such links are subject to the privacy policies of third parties, third parties and third party websites are independent from Mars Sportif and Mars Sportif shall not be responsible for the privacy practices of third parties under any circumstances.

XIII. AMENDMENTS

Mars Sportif has the right to make changes to this Personal Data Protection and Privacy Policy from time to time in the light of the Regulations to be issued in accordance with the KVKK and other legislation and for other reasons, including but not limited to. The current version of the Policy will be published on the websites of Mars Sportif and will be available to users and members on the websites.

XIV. ENFORCEMENT

This Policy will enter into force on the date of its publication and will remain in force until it is removed from the website.

ANNEX: MARS SPORTIF PERSONAL DATA STORAGE AND DESTRUCTION POLICY

1. Definitions

Related User	Except for the person or unit responsible for the technical storage, protection and backup of the data, persons who process personal data within the data controller organization or in accordance with the authorization and instruction received from the data controller.
Destruction	Means the deletion, destruction or anonymization of personal data.
Periodic Disposal	It refers to the deletion, destruction or anonymization process to be carried out ex officio at recurring intervals specified in the personal data retention and destruction policy in the event that all of the conditions for processing personal data specified in the law disappear.
Deletion of Personal Data	It is the process of making personal data inaccessible and non-reusable in any way for the relevant users.
Destruction of Personal Data	Making personal data inaccessible, irretrievable and non-reusable by anyone in any way.
Anonymization of Personal Data	Making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even by matching it with other data.

2. Purpose and Scope of Personal Data Retention and Destruction Policy

The purpose of this Deletion and Destruction Policy is to ensure that Mars Sportif processes, stores, and safeguards personal data in full compliance with the Law on the Protection of Personal Data ("Law" or "KVKK"). This policy further aims to guarantee that, even when personal data has been lawfully processed, it is deleted, destroyed, or anonymized in accordance with the KVKK and the Regulation on the Deletion, Destruction, or Anonymization of Personal Data ("Regulation") a secondary regulation under the KVKK, published in the Official Gazette dated 28.10.2017 and numbered 30224 once the reasons necessitating its processing cease to exist and the legal retention periods have expired. Moreover, this policy seeks to ensure full adherence to all obligations imposed by the Regulation.

This Deletion and Destruction Policy applies to the storage and destruction of personal data processed by Mars Sportif.

This Deletion and Destruction Policy has been handled and prepared based on the KVKK, "*Regulation on Deletion, Destruction or Anonymization of Personal Data*" and other legislation on the storage and destruction of personal data.

3. Activities of Deletion, Destruction and Anonymization of Personal Data Conducted by Mars Sportif

Personal data are retained by Mars Sportif only within the retention and limitation periods specified in the relevant legislation and/or for the period required for the purpose for which they are processed. Accordingly, Mars Sportif first determines whether there is any period and/or statute of limitations for the storage of personal data in the relevant legislation and stores personal data in accordance with these periods. In the event that no period of time is stipulated in the relevant legislation, personal data are stored in accordance with the KVKK and for the period required for the purpose for which they are processed.

As regulated in Article 7 of the KVKK, Mars Sportif destroys personal data by deleting, destroying or anonymizing personal data in accordance with Articles 8, 9 and 10 of the "Regulation on Deletion, Destruction or Anonymization of Personal Data" ex officio or upon the request of the relevant person, in the event that the reasons requiring its processing disappear and/or the legal retention periods expire, although it has been processed in accordance with the provisions of the relevant law.

In order to fulfill its obligations arising from the Law and the Regulation, Mars Sportif has taken the necessary technical and administrative measures, developed the necessary functioning mechanisms in this regard, trains its relevant units to comply with these obligations and makes the necessary assignments in this regard.

4. Circumstances Requiring Destruction of Personal Data

Pursuant to the KVKK and the Regulation, personal data of Data Owners shall be deleted, destroyed or anonymized by Mars Sportif ex officio or upon request in the cases listed below:

- a. Amendment and/or repeal of the provisions of other legislation that constitute the basis for the processing, storage and retention periods of personal data in a way that eliminates the obligation to store personal data,
- b. The purpose requiring the processing or storage of personal data disappears,
- c. The disappearance of the "Conditions for Processing Personal Data" specified in Articles 5 and 6 of the Law.
- d. In cases where the processing of personal data takes place only on the basis of "explicit consent", the Data Owners's withdrawal of consent,
- e. Acceptance by the data controller of the Data Owners's application for the deletion, destruction or anonymization of his/her personal data within the scope of his/her rights mentioned in paragraphs 2/e-f of Article 11 of the KVKK,
- f. The Board's decision on the deletion, destruction or anonymization of personal data,
- g. Following the expiration of the maximum period for which personal data is required to be retained, there is no legal requirement that would justify retaining personal data for a longer period of time,

5. Methods of Deletion, Destruction and Anonymization of Personal Data

Mars Sportif may use deletion, destruction and anonymization methods in the destruction of personal data in accordance with KVKK:

- a. **Deletion Methods** : Mars Sportif uses one or more of the following methods as deletion methods depending on the nature of the personal data and the environment in which it is located; deletion by command from the database, blackout.
- b. **Destruction Methods** : Mars Sportif uses one or more of the methods of physical destruction, de-magnetization, overwriting as destruction methods depending on the nature of the personal data and the environment in which it is located.
- c. **Anonymization Methods** : In order to anonymize personal data, Mars Sportif uses one or more of the following anonymization methods: regional hiding, removing variables, removing records, generalization, lower and upper limit coding, global coding, sampling, data exchange, noise addition, micro merging, data hashing and distortion as an anonymization method depending on the nature, size, structure and diversity of the relevant data, the benefit to be obtained from the data and the purpose of processing.

6. Unit, Title and Job Descriptions of Mars Sportif Personnel Involved in Personal Data Storage and Destruction Processes

Business Systems Manager and Hardware & System Manager will be responsible for storing, deleting, destroying and anonymizing personal data from the database. The job descriptions of these persons have been determined by Mars Sportif as follows:

Business Systems Manager

Department : Information Technology

Summary job description : Designing and managing software needs in line with company strategies.

System Administrator

Department : Information Technology

Summary job description : Managing the infrastructure required for the smooth operation of the applications and business systems used within the company and ensuring their security.

7. Storage and Destruction Periods

Data Category	Storage Period(s)	Related Legislation	Destruction Period
Personal Data Regarding Persons/Members Receiving Products or Services	3 years as per Law 6563 and related secondary legislation, 10 years after the legal relationship ends;	Turkish Code of Obligations, Law on the regulation of electronic commerce and related secondary legislation	Upon expiry of the storage period, it is destroyed in the first periodic destruction.
All Records of Accounting and Financial Transactions	10 years	Turkish Commercial Code and Tax Procedure Law	Destroyed at the first periodic destruction upon expiry of the storage period.
Call Center Voice Recordings	3 years	Law on the Regulation of Electronic Commerce and related secondary legislation and Law on Consumer Protection	Destroyed at the first periodic destruction upon expiry of the storage period.
Records Regarding Membership and Purchase	10 years	Turkish Code of Obligations, Turkish Commercial Code, Consumer Protection Law and Tax Procedure Law	Destroyed at the first periodic destruction upon expiry of the storage period.
Commercial Electronic Message Consent Records	3 years from the date of withdrawal of consent	Law on the Regulation of Electronic Commerce and related secondary legislation	Destroyed at the first periodic destruction upon expiry of the storage period.
Traffic Information on Online Visitors	2 years	Law on the Regulation of Publications on the Internet and Combating Crimes Committed Through These Publications	Destroyed at the first periodic destruction upon expiry of the storage period.

Cookies	6 Months - Maximum 2 Years	Law on the Regulation of Publications on the Internet and Combating Crimes Committed Through These Publications	Destroyed at the first periodic destruction upon expiry of the storage period.
Supplier Data, Supplier Employee and Supplier Official	10 years after the end of the legal relationship	Turkish Commercial Code, Tax Procedure Law	Destroyed at the first periodic destruction upon expiry of the storage period.
Employee Data	10 Years from the Termination of Operations	Labor Law, Social Security and General Health Insurance Law	Destroyed at the first periodic destruction upon expiry of the storage period.
Employee Candidate Data	The data of all employee candidates whose application process is negative is destroyed.	The data of all employee candidates whose application process is negative is destroyed.	The data of all employee candidates whose application process is negative is destroyed.
Visitor Data	2 Years from the End of the Visit	Personal Data Protection Authority Personal Data Retention and Destruction Policy Published by KVKK	Destroyed at the first periodic destruction upon expiry of the storage period.
Camera Recordings	2 Years	Personal Data Protection Authority Personal Data Retention and Destruction Policy Published by KVKK	Destroyed at the first periodic destruction upon expiry of the storage period.
Data Regarding Job Application/Internship Application/ Candidate Applications if the Application is not Accepted (e.g. CV, Resume, Cover Letter, Application Form, etc.)	2 Years	Sectoral Practices	CVs that are more than two years old are destroyed in computerized form. For physical CVs, the period is 6 months.

Data on Potential Customers	13 Months	European Union / Sectoral Customary Practice	Destroyed at the first periodic destruction upon expiry of the storage period.
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8. Technical and Administrative Measures Taken by Mars Sportif for Secure Storage of Personal Data and Prevention of Unlawful Processing and Access

8.1. In General

8.1.1. Administrative Measures

- There are disciplinary regulations for employees that include data security provisions.
- Authorization matrix has been created for employees.
- Corporate policies on access, information security, use, storage and disposal have been prepared and implemented.
- Confidentiality commitments are made.
- Employees who are reassigned or leave their jobs are de-authorized in this area.
- The signed contracts contain data security provisions.
- Personal data security policies and procedures have been determined.
- Personal data security issues are reported quickly.
- Personal data security is monitored.
- Personal data is minimized as much as possible.
- Existing risks and threats have been identified.

8.1.2. Technical Measures

- Network security and application security are ensured.
- Closed system network is used for personal data transfers through the network.
- Key management is in place.
- Security measures are taken within the scope of procurement, development and maintenance of information technology systems.
- The security of personal data stored in the cloud is ensured.
- Access logs are kept regularly.
- Data masking measures are applied when necessary.
- Up-to-date anti-virus systems are used.
- Firewalls are used.
- Personal data security is monitored.
- Necessary security measures are taken regarding entry and exit to physical environments containing personal data.
- Physical environments containing personal data are secured against external risks (fire, flood, etc.).
- The security of environments containing personal data is ensured.

- Personal data is backed up and the security of backed up personal data is also ensured.
- User account management and authorization control system are implemented and monitored.
- Log records are kept without user intervention.
- Intrusion detection and prevention systems are used.
- Cyber security measures have been taken and their implementation is constantly monitored.
- Encryption is performed.
- Penetration test is applied.
- Data loss prevention software is used.

8.2. Specifically

- i.** The access of membership services representatives working in clubs to member data is restricted by the relevant software, and in this context, they are not authorized to obtain bulk member lists from the software in order to ensure data security.
- ii.** In order to ensure data security and limit authorization, access authorizations have been limited so that each club employee has access only to the club member data they work for.
- iii.** On the company's main server, personnel access authorizations are restricted.
- iv.** A "deep freeze" system was installed on the computers provided by Mars Sportif for public use in the clubs, and the downloaded files were deleted whenever the computers were restarted. In addition, the computers in question were reorganized to include Chrome and Explorer applications for internet access only.
- v.** New encryption techniques have been introduced for staff computers and periodic password change is mandatory.
- vi.** The usb inputs and printing authorizations of the computers allocated to the staff are limited. In clubs, usb usage is defined only for the club manager and 1 computer.