

DATA PROTECTION AND PRIVACY POLICY

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DEFINITIONS

Explicit Consent	Consent that is specific to a particular matter, based on information provided, and freely given
Anonymization	Ensuring that personal data, even when combined with other data, cannot under any circumstances be associated with an identified or identifiable natural person; The alteration of personal data in such a way that it loses its character as personal data and this change is irreversible.
Application Form	The form provided as an annex to this Policy, which contains the request to be submitted by the data subject to exercise their rights under applicable legislation
Website(s)	Any one or all of the websites owned by Mars Spor Kulübü : www.macfit.com.tr , www.nuspa.com.tr , and www.marsathletic.com
Business Partner	Natural or legal persons with whom Mars Spor Kulübü has established a business partnership—either directly or in conjunction with its shareholder companies or group companies—for purposes such as carrying out various projects or obtaining services 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—whether fully or partially automated, or carried out by non-automated means provided it forms part of a data recording system—such as the collection, recording, storage, retention, alteration, reorganization, disclosure, transfer, acquisition, making available, classification, or restriction of use of such data process
Sensitive Personal Data	Data related to race, ethnic origin, political opinions, philosophical beliefs, religion, denomination, or other beliefs; attire; membership in associations, foundations, or labor unions; health; sexual life; criminal convictions and security measures; as well as biometric and genetic data

Data Subject	The 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 authority granted by the data controller
Data Controller	A natural or legal person who determines the purposes and means of processing personal data and manages the location where the data is systematically stored (data recording system)

ABBREVIATIONS

KVKK	The Law on the Protection of Personal Data No. 6698, published in the Official Gazette No. 29677 dated April 7, 2016
KVK Board	Personal Data Protection Board
Mars Spor Kulübü / Company	Mars Spor Kulübü and Facilities Management Inc.
Policy	The Personal Data Protection and Privacy Policy prepared and published by Mars Spor Kulübü ve Tesisleri İşletmeciliği A.Ş.

DATA PROTECTION AND PRIVACY POLICY

I. INTRODUCTION

As Mars Spor Kulübü ve Tesisleri İşletmeciliği A.Ş. (“Mars Spor Kulübü”), we exercise the utmost care regarding the protection of personal data and its processing in compliance with the Law and applicable regulations. To ensure compliance with the Personal Data Protection Law No. 6698 (“KVKK”), the Company has adopted the principles set forth by the Personal Data Protection Board (“KVK Board”) and fulfills its obligations regarding the processing, erasure, destruction, anonymization, and transfer of personal data, as well as informing the data subject and ensuring data security. This Personal Data Protection and Privacy Policy (“Policy”), prepared within this scope, is made available to the Data Subject(s) whose personal data is processed.

Our company places great importance on the protection of personal data of our customers/members, business partners, shareholders, and employees who contact us or enter into a contract with us—either directly or as a representative of a company or organization—and/or who use the services we provide, as well as other individuals who apply for a job, by visiting our Websites, through our mobile applications or social media accounts, or by establishing a relationship with us in any other manner.

In this context, as a Company, we have prepared this Policy to ensure compliance with the Personal Data Protection Law (KVKK) and other applicable legislation, and to outline our policy regarding the processing of personal data under the KVKK.

II. PURPOSE AND SCOPE

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

The purpose of this Policy is to establish management directives and procedural requirements to ensure that Mars Spor Kulübü processes and protects the personal data of data subjects in compliance with the KVKK, and to create a technical and administrative policy in this regard.

This Policy applies to all activities related to the processing and protection of personal data held by Mars Spor Kulübü in its capacity as “*Data Controller*” and/or “*Data Processor*.” The Policy has been developed and prepared in accordance with the KVKK and other legislation regarding the processing and protection of personal data.

This Policy outlines Mars Spor Kulübü’s:

- a. The methods and legal grounds for collecting Personal Data
- b. Which groups of individuals’ Personal Data are processed
- c. The categories of Personal Data processed regarding these groups of individuals (Data Categories) and examples of data types
- d. The business processes in which this Personal Data is used and the purposes for which it is used
- e. Technical and administrative measures taken to ensure the security of Personal Data
- f. To whom and for what purposes Personal Data may be transferred
- g. The retention periods for Personal Data
- h. What rights the Data Subject has regarding their Personal Data and how they can exercise these rights
- i. How Data Subjects can change their preferences regarding the receipt of electronic commercial communications, whether positive or negative
- j. Sharing Personal Data with government authorities

III. PERSONAL DATA

A. Definition of Personal Data

Under Article 3/I(d) of the Personal Data Protection Law (KVKK), “*personal data*” refers to any information relating to identified or identifiable natural persons. Within this scope,

anonymous information, information that has been anonymized, and other data that cannot be associated with a specific individual are not considered personal data under this Policy.

B. General Principles Governing the Processing of Personal Data

Under Article 3/I(e) of the KVKK, any operation performed on personal data—whether fully or partially automated, or carried out by non-automated means provided it is part of a data recording system—such as the collection, recording, storage, retention, alteration, reorganization, disclosure, transfer, acquisition, making available, classifying, or restricting the use of personal data—all such operations fall under the scope of “*data processing*.”

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

- (i) Compliance with the law and the principles of good faith,
- (ii) Accuracy and, where necessary, up-to-date status,
- (iii) Processing for specific, explicit, and legitimate purposes,
- (iv) Processing that is relevant, limited, and proportionate to the purpose for which it is processed,
- (v) Retention for the period prescribed by applicable legislation or as necessary for the purpose for which they are processed.

In this context, Mars Spor Kulübü and, on behalf of Mars Spor Kulübü, its branches/clubs and affiliated companies, or through websites, mobile applications, and any other channels (including but not limited to these), in written, oral, or electronic form; your personal data and/or special category personal data obtained under the KVKK and other applicable legislation; may be collected, recorded, retained, and stored in the manners prescribed by the KVKK; retained, modified, and shared with other persons deemed appropriate by Mars Spor Kulübü—for legal and statutory reasons or in accordance with the legal and practical requirements of the services provided by Mars Spor Kulübü —and/or with relevant third parties (natural or legal persons) in Turkey or abroad, and may be processed, including through transfer abroad.

C. Personal Data Processed by Mars Spor Kulübü

1. In General

Mars Spor Kulübü may process personal data and special category personal data with the data subject’s explicit consent or, in the cases provided for in Articles 5 and 6 of the Personal Data Protection Law (KVKK), without explicit consent.

Mars Spor Kulübü processes personal data and special category personal data in accordance with the Consumer Protection Law No. 6502, the Regulation on Subscription Contracts issued pursuant to this law, the Regulation on Distance Contracts, the Law on the Regulation of Electronic Commerce No. 6563, the Regulation on Private Physical Education and Sports Facilities, the Labor Law No. 4857, the Social Insurance and General Health Insurance Law No. 5510, the Turkish Commercial Code No. 6102, the Tax Procedure Law No. 213, and all

other laws—including but not limited to those listed—as well as the regulations, circulars, and all other legal provisions associated with these laws, and in accordance with the provisions set forth in the relevant legislation.

2. Specifically

In light of other applicable legislation and in accordance with the principles set forth in this Policy and the legitimate interests of Mars Spor Kulübü, the Data Subject Groups subject to or potentially subject to data processing activities by Mars Spor Kulübü consist of Job Applicants, Employees, Interns, Shareholders/Partners, Potential Product or Service Recipients, Supplier Employee, Supplier Representative, Product or Service Recipient/Member, Online Visitor, and Visitor; the personal data that may be processed for these Data Subject Groups are listed below:

1.	Product or Service Recipient a. Identification Information: First name, last name, Turkish ID number, gender, nationality b. Location Information: GPS Information, if permission has been granted via the Mobile App c. Contact Information: Phone Number, Address, Email, Social Media Username d. Customer Transaction Information: Call Center Records, WhatsApp Messages, Information on Purchased Services, Club Usage (Entry/Exit) Information, Call Center Records, Invoices, Request Information, Information on Purchased Services, Reception Interview Records, Shopping Information e. Physical Premises Security: Entry and exit log information, security camera recordings f. Marketing Information: Purchase History Information, Advertising Forms, Information Obtained Through Campaigns, Cookie Records, User Information Displayed on Advertising Panels, Payment Records, Purchase and Service Fee Information, Reservation Date and Time Information, Current Membership Status Information g. Visual and Audio Records: Photos (if uploaded by the member via the mobile app) h. Transaction Security: IP Address Information, Website Login and Logout Information, Membership Portal Login Information i. IBAN Number for refund transactions in cases where a refund is not issued to a credit card
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	j. Legal Proceedings: Consumer Arbitration Board Applications, Consumer Court Decisions, Consumer Arbitration Board File Contents, Consumer Lawsuit File Contents k. Health Information: Survey responses regarding health information for the Nutrition Counseling Service, Body Measurement Information, Pre-Service Health Survey Responses, Information regarding disability status for the purpose of benefiting from special campaigns, health declaration
2.	Potential Product or Service Purchaser/Site Member a. Identification Information: First Name-Last Name, Turkish ID Number, Age, Date of Birth, Gender b. Contact Information: Phone Number, Email, Address c. Transaction Security Information: IP Address Information, Website Login and Logout Information d. Marketing Information: Ad Forms, Information Obtained Through Campaign Activities, Cookie Records, Cookies, User Information Displayed on Ad Panels
3.	Visitor a. Contact Information: Phone Number, Email b. Physical Premises Security: Entry and Exit Logs, Security Camera Footage
4.	Online Visitor/Visitor a. Transaction Security Information: IP Address Information, Website Entry and Exit Information
5.	Employee Data/Intern Data a. Identity Information: First Name, Last Name, Date of Birth, Place of Birth, Turkish ID Number, Mother's Name, Father's Name, Marital Status, ID Card Serial Number, Certified Copy of the Population Registry, Nationality, Marital Status b. Contact Information: Phone Number, Email, Address c. Personnel Records: Disciplinary Investigations, Performance Evaluation Reports, Hiring Records

	d. Physical Premises Security: Workplace Entry and Exit Records, Security Camera Footage e. Professional Experience Information: Degree Information, Courses Taken, On-the-Job Training Information, Certificates, GPA f. Audio-Visual Records: Digital Training Content, Photographs, and Digital Interview Content g. Health Information: Medical Reports, Information Regarding Disability Status, Blood Type Information, Personal Health Information Contained in the Medical Report in the Personnel File h. Criminal Convictions and Security Measures: Criminal Record i. Legal Proceedings: Case File Information, Wage Garnishment Information, Information on Parties and Case Contents, Information Served via E-Notification j. Financial Information: Bank IBAN Number
6.	Job Applicant Data a. Identification Information: First Name, Last Name, Turkish ID Number, Date of Birth, Nationality, Marital Status b. Contact Information: Email Address, Phone Number, Address c. Physical Premises Security: Camera recordings from job interviews conducted at branches and headquarters d. Professional Experience Information: Degree Information, Courses Taken, On-the-Job Training Information, Certificates, GPA e. Audio-Visual Records: Photographs, Digital Interview Recordings f. Health Information: Information Regarding Disability Status, Blood Type, Personal Health Information Contained in the Health Report in the Personnel File
7.	Shareholder/Partner Data a. Identification Information: First Name, Last Name, Turkish ID Number, Date of Birth b. Contact Information: Phone Number, Email

8.	Supplier Employee a. Identification Information: First Name, Last Name, Turkish ID Number, Date of Birth b. Contact Information: Phone Number, Email, Address c. Criminal Convictions and Security Measures: Criminal Record d. Employment Records: Employment Start Date Certificate, Social Security Service History e. Professional Experience: Professional Qualification Certificate f. Health: Medical Report
	Supplier Representative a. Identification Information: First Name, Last Name, Turkish ID Number, Date of Birth b. Contact Information: Phone Number, Email, Address c. Financial Information: Bank IBAN Number
9.	Independent Trainer a. Identification Information: First Name-Last Name, Turkish ID Number, Date of Birth, Gender, b. Contact Information: Phone Number, Email Address, Address, Cell Phone Information c. Financial Information: Bank IBAN, Tax ID d. Professional Experience: Degree Information, Courses Taken, On-the-Job Training, Certificates, Transcripts e. Visual and Audio Recordings: Exercise Videos and Photos, Digital Educational Content, Photos f. Body Measurements: Clothing Size, Shoe Size g. Physical Premises Security: Entry and Exit Records, Security Camera Footage h. Legal Proceedings: Case File Information, Wage Garnishment Information, Information on Parties and Case Contents, Information Served via E-Notification

	i. Criminal Convictions and Security Measures: Criminal Record j. Health: Medical Report
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IV. Purposes of Processing Personal Data

1. In General

Identity Information

- Conducting Emergency Management Processes
- Conducting Information Security Processes
- Conducting Candidate/Intern/Student Selection and Placement Processes
- Execution of Job Applicant Application Processes
- Implementation of Employee Satisfaction and Engagement Processes
- Fulfillment of Obligations Arising from Employment Contracts and Legislation for Employees
- Implementation of Employee Benefits and Perks Processes
- Conducting Audit and Ethics Activities
- Conducting Training Activities
- Implementation of Access Authorizations
- Ensuring Compliance with Legislation
- Implementation of Company/Product/Service Loyalty Processes
- Ensuring Physical Premises Security
- Conducting Assignment Processes
- Monitoring and Execution of Legal Matters
- Conducting Internal Audit, Investigation, and Intelligence Activities
- Conducting Communication Activities
- Planning of Human Resources Processes
- Conducting and Overseeing Business Operations
- Conducting Occupational Health and Safety Activities
- Receiving and Evaluating Recommendations for Improving Business Processes
- Conducting Business Continuity Activities
- Execution of Logistics Activities
- Conducting Goods and Services Procurement Processes
- Conducting Post-Sales Support Services for Goods and Services
- Execution of Goods/Services Sales Processes
- Execution of Goods and Services Production and Operations Processes
- Execution of Customer Relationship Management Processes
- Execution of Activities Aimed at Customer Satisfaction
- Organization and Event Management
- Execution of Marketing Analysis Studies
- Execution of Performance Evaluation Processes

- Execution of Advertising, Campaign, and Promotion Processes
- Conducting Risk Management Processes
- Conducting Storage and Archiving Activities
- Conducting Social Responsibility and Civil Society Activities
- Execution of Contract Processes
- Execution of Strategic Planning Activities
- Tracking Requests and Complaints
- Execution of Supply Chain Management Processes
- Implementation of the Compensation Policy
- Execution of Product/Service Marketing Processes
- Ensuring the Security of Data Controller Operations
- Execution of Investment Processes
- Execution of Talent and Career Development Activities
- Processing Work and Residence Permits for Foreign Employees
- Providing Information to Authorized Individuals, Institutions, and Organizations

Contact Information

- Implementation of Emergency Management Processes
- Implementation of Information Security Processes
- Execution of Candidate/Intern/Student Selection and Placement Processes
- Execution of Job Applicant Application Processes
- Implementation of Employee Satisfaction and Engagement Processes
- Fulfillment of Obligations Arising from Employment Contracts and Legislation for Employees
- Implementation of Employee Benefits and Perks Processes
- Conducting Audit and Ethics Activities
- Conducting Training Activities
- Implementation of Access Authorizations
- Ensuring Compliance with Legislation
- Implementation of Company/Product/Service Loyalty Processes
- Conducting Assignment Processes
- Monitoring and Conducting Legal Affairs
- Execution of Internal Audit, Investigation, and Intelligence Activities
- Conducting Communication Activities Planning Human Resources Processes
- Execution and Oversight of Business Operations
- Conducting Occupational Health and Safety Activities
- Receiving and Evaluating Recommendations for the Improvement of Business Processes
- Conducting Business Continuity Activities
- Conducting Logistics Activities
- Conducting Goods and Services Procurement Processes
- Conducting Post-Sales Support Services for Goods and Services
- Execution of Goods/Services Sales Processes
- Execution of Goods and Services Production and Operations Processes
- Execution of Customer Relationship Management Processes

- Execution of Activities Aimed at Customer Satisfaction
- Organization and Event Management
- Execution of Marketing Analysis Studies
- Execution of Performance Evaluation Processes
- Execution of Advertising, Campaign, and Promotion Processes
- Conducting Risk Management Processes
- Conducting Storage and Archiving Activities
- Conducting Social Responsibility and Civil Society Activities
- Execution of Contract Processes
- Execution of Strategic Planning Activities
- Tracking Requests and Complaints
- Execution of Supply Chain Management Processes
- Implementation of the Compensation Policy
- Execution of Product/Service Marketing Processes
- Ensuring the Security of Data Controller Operations
- Execution of Investment Processes
- Execution of Talent and Career Development Activities
- Providing Information to Authorized Individuals, Institutions, and Organizations
- Processing Work and Residence Permits for Foreign Personnel
- Creating and Tracking Visitor Records

Location Information

- Conducting Communication Activities
- Conducting/Monitoring Business Activities
- Conducting Activities Aimed at Customer Satisfaction
- Conducting Marketing Analysis Studies

Personnel Information

- Conducting Emergency Management Processes
- Fulfillment of Obligations Arising from Employment Contracts and Legislation for Employees
- Implementation of Employee Benefits and Perks Processes
- Conducting Audit and Ethics Activities
- Conducting Training Activities
- Ensuring Activities Are Conducted in Compliance with the Law
- Conducting Assignment Processes
- Monitoring and Handling Legal Matters
- Conducting Internal Audit, Investigation, and Intelligence Activities
- Planning of Human Resources Processes
- Conducting and Overseeing Business Operations
- Conducting Occupational Health and Safety Activities
- Conducting Logistics Operations
- Execution of Goods and Services Procurement Processes
- Organization and Event Management

- Conducting Performance Evaluation Processes
- Conducting Storage and Archiving Activities
- Execution of Contract Processes
- Tracking Requests and Complaints
- Execution of Supply Chain Management Processes
- Implementation of the Compensation Policy
- Ensuring the Security of Data Controller Operations
- Providing Information to Authorized Individuals, Institutions, and Organizations

Knowledge of Legal Proceedings

- Management of Emergency Response Processes
- Fulfilling Obligations Arising from Employment Contracts and Legislation for Employees
- Administering Employee Benefits and Perks
- Conducting Audit and Ethics Activities
- Monitoring and Execution of Legal Matters
- Conducting Internal Audit, Investigation, and Intelligence Activities
- Planning of Human Resources Processes
- Conducting and Overseeing Business Operations
- Conducting Occupational Health and Safety Activities
- Conducting Business Continuity Activities
- Management of Contract Processes
- Providing Information to Authorized Individuals, Institutions, and Organizations

Customer Transaction Information

- Conducting Information Security Processes
- Implementation of Access Authorizations
- Conducting Activities in Compliance with Legislation
- Conducting Communication Activities
- Execution of Post-Sales Support Services for Goods/Services
- Execution of Goods/Services Sales Processes
- Execution of Customer Relationship Management Processes
- Conducting Activities Aimed at Customer Satisfaction
- Conducting Marketing Analysis Studies
- Execution of Advertising, Campaign, and Promotion Processes
- Execution of Risk Management Processes
- Execution of Storage and Archiving Activities
- Conducting Contract Processes
- Execution of Product/Service Marketing Processes
- Ensuring the Security of Data Controller Operations
- Execution of Investment Processes

Knowledge of Physical Premises Security

- Execution of Emergency Management Processes

- Execution of Information Security Processes
- Fulfilling Obligations Arising from Employment Contracts and Legislation for Employees
- Implementation of Employee Benefits and Perks Processes
- Conducting Audit and Ethics Activities
- Implementation of Access Authorizations
- Ensuring Compliance with Laws and Regulations
- Implementation of Company/Product/Service Loyalty Processes
- Ensuring Physical Premises Security
- Monitoring and Handling Legal Matters
- Conducting Internal Audit, Investigation, and Intelligence Activities
- Conducting Communication Activities
- Planning of Human Resources Processes
- Conducting and Overseeing Business Operations
- Conducting Occupational Health and Safety Activities
- Conducting Business Continuity Activities
- Execution of Goods/Services Sales Processes
- Execution of Activities Aimed at Customer Satisfaction
- Organization and Event Management
- Conducting Marketing Analysis Studies
- Conducting Performance Evaluation Processes
- Execution of Advertising, Campaign, and Promotion Processes
- Conducting Risk Management Processes
- Conducting Storage and Archiving Activities
- Management of Contract Processes
- Tracking Requests and Complaints
- Implementation of the Compensation Policy
- Execution of Product/Service Marketing Processes
- Ensuring the Security of Data Controller Operations
- Providing Information to Authorized Individuals, Institutions, and Organizations

Transaction Security Information

- Implementation of Information Security Processes
- Conducting Activities in Compliance with Regulations
- Implementation of Company/Product/Service Commitment Processes
- Execution of Communication Activities
- Execution of Post-Sales Support Services for Goods and Services
- Execution of Customer Relationship Management Processes
- Conducting Marketing Analysis Studies
- Execution of Advertising, Campaign, and Promotion Processes
- Conducting Risk Management Processes
- Management of Storage and Archiving Activities
- Tracking Requests and Complaints
- Execution of Marketing Processes for Products/Services

- Ensuring the Security of Data Controller Operations
- Providing Information to Authorized Individuals, Institutions, and Organizations

Financial Information

- Conducting Activities in Compliance with Legislation
- Conducting and Auditing Business Activities
- Conducting Storage and Archiving Activities
- Conducting Contract Processes

Professional Experience Information

- Conducting Emergency Management Processes
- Conducting Information Security Processes
- Conducting Candidate/Intern/Student Selection and Placement Processes
- Execution of Job Applicant Application Processes
- Fulfillment of Obligations Arising from Employment Contracts and Legislation for Employees
- Conducting Audit and Ethics Activities
- Conducting Training Activities
- Conducting Activities in Compliance with the Law
- Conducting Assignment Processes
- Monitoring and Handling Legal Matters
- Conducting Internal Audit, Investigation, and Intelligence Activities
- Planning of Human Resources Processes
- Conducting and Overseeing Business Operations
- Conducting Occupational Health and Safety Activities
- Receiving and Evaluating Recommendations for the Improvement of Business Processes
- Conducting Business Continuity Activities
- Execution of Logistics Activities
- Conducting Goods and Services Procurement Processes
- Conducting Goods and Services Production and Operations Processes
- Conducting Performance Evaluation Processes
- Conducting Risk Management Processes
- Conducting Storage and Archiving Activities
- Management of Contract Processes
- Execution of Supply Chain Management Processes
- Management of the Compensation Policy
- Ensuring the Security of Data Controller Operations
- Conducting Talent and Career Development Activities
- Providing Information to Authorized Individuals, Institutions, and Organizations

Marketing Information

- Conducting Information Security Processes

- Managing Access Permissions
- Conducting Activities in Compliance with Legislation
- Implementation of Company/Product/Service Loyalty Processes
- Management of Communication Activities
- Management of Goods/Services Sales Processes
- Conducting Marketing Analysis Studies
- Execution of Advertising, Campaign, and Promotion Processes
- Execution of Risk Management Processes
- Conducting Storage and Archiving Activities
- Conducting Strategic Planning Activities
- Implementation of the Compensation Policy
- Execution of Product/Service Marketing Processes
- Ensuring the Security of Data Controller Operations
- Conducting Investment Processes

Audio-Visual Records

- Implementation of Information Security Processes
- Conducting Candidate, Intern, and Student Selection and Placement Processes
- Conducting Job Applicant Application Processes
- Execution of Employee Satisfaction and Engagement Processes
- Fulfillment of Obligations Arising from Employment Contracts and Legislation for Employees
- Implementation of Processes Related to Employee Benefits and Perks
- Conducting Audit and Ethics Activities
- Conducting Training Activities
- Management of Access Permissions
- Ensuring Activities Are Conducted in Compliance with the Law
- Conducting Internal Audit, Investigation, and Intelligence Activities
- Planning of Human Resources Processes
- Conducting and Monitoring Business Operations
- Receiving and Evaluating Recommendations for Improving Business Processes
- Execution of Goods and Services Procurement Processes
- Conducting Goods and Services Sales Processes
- Execution of Goods and Services Production and Operations Processes
- Organizational and Event Management
- Execution of Performance Evaluation Processes
- Execution of Risk Management Processes
- Execution of Storage and Archiving Activities
- Execution of Contract Processes
- Ensuring the Security of Data Controller Operations
- Conducting Talent and Career Development Activities

Health Information

- Conducting Emergency Management Processes
- Conducting Candidate/Intern/Student Selection and Placement Processes
- Conducting Job Applicant Application Processes
- Fulfillment of Obligations Arising from Employment Contracts and Legislation for Employees
- Implementation of Employee Benefits and Perks Processes
- Conducting Audit and Ethics Activities
- Managing Access Permissions
- Ensuring Compliance with Legislation
- Planning of Human Resources Processes
- Conducting and Auditing Business Operations
- Conducting Occupational Health and Safety Activities
- Receiving and Evaluating Recommendations for Improving Business Processes
- Conducting Post-Sales Support Services for Goods and Services
- Execution of Goods/Services Sales Processes
- Organization and Event Management
- Implementation of Risk Management Processes
- Execution of Storage and Archiving Activities
- Management of Contract Processes
- Tracking Requests and Complaints
- Ensuring the Security of Data Controller Operations
- Providing Information to Authorized Individuals, Institutions, and Organizations

Criminal Convictions and Security Measures

- Fulfillment of Obligations Arising from Employment Contracts and Legislation for Employees
- Conducting Activities in Compliance with the Law
- Planning of Human Resources Processes
- Conducting Audits and Ethics Activities
- Conducting Operations in Compliance with the Law
- Monitoring and Handling Legal Matters
- Conducting Internal Audit, Investigation, and Intelligence Activities
- Conducting Occupational Health and Safety Activities
- Conducting Business Operations/Audits
- Conducting Storage and Archiving Activities
- Conducting Contract Processes
- Tracking Requests/Complaints
- Ensuring the Security of Data Controller Operations

Body Measurements

- Conducting Goods/Services Procurement Processes
- Execution of Contract Processes

2. Specifically

Mars Spor Kulübü may process personal data for the purposes specifically listed below, in addition to the purposes stated above, and may retain such data for as long as necessary to fulfill these purposes and, in any case, for the periods required by applicable laws and regulations:

- (i) Compliance with legal and administrative obligations,
- (ii) Negotiating, establishing, and performing contracts that have been or are intended to be entered into,
- (iii) The effective provision and development of services requested by members; the creation and management of members' personal accounts via the website; the administration of membership transactions through personal accounts; and informing members and customers about campaigns and opportunities, or providing information regarding prices, marketing, other benefits, offers, and details related to the services provided,
- (iv) Ensuring the security of Mars Spor Kulübü's website and other electronic systems, social media accounts, and physical premises,
- (v) Promoting and marketing Mars Spor Kulübü's services and developing them, as well as gathering the data subject's opinions through surveys and polls,
- (vi) Ensuring entry and exit security and preventing unauthorized and illegal entry,
- (vii) Including data subjects in birthday celebrations, raffles, campaigns, or contests; providing gifts; and conducting similar events, promotions, and campaigns that benefit the data subject,
- (viii) Investigating, identifying, and preventing violations of the contract and the law, and reporting them to the relevant administrative or judicial authorities,
- (ix) Resolving current and future legal disputes,
- (x) Responding to requests and questions,
- (xi) Conducting corporate and partnership law transactions,
- (xii) Conducting hiring processes in accordance with human resources policies,
- (xiii) Evaluating the suitability of job applications, finalizing them, and communicating with applicants,
- (xiv) Data processing is necessary for the establishment, exercise, or protection of a right,
- (xv) Protection of Mars Spor Kulübü's legitimate interests, provided that this does not infringe upon the data subject's fundamental rights and freedoms.

V. Transfer of Personal Data Within and Outside Turkey

1. General Provisions

Mars Spor Kulübü may transfer the personal data it has obtained to third parties both within and outside Turkey and may process and store such data on servers or in other electronic environments located within or outside Turkey, provided that it complies with the general

principles set forth in the Personal Data Protection Law (KVKK) and the conditions stipulated in Articles 8 and 9 of the KVKK, and provided that it takes the necessary security measures, in accordance with the purposes specified in this Policy. While 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 subject and Mars Spor Kulübü—they generally include the following:

- (i) Mars Spor Kulübü Club Group Companies,
- (ii) Storage providers, platform owners, data publishing organizations, infrastructure providers, and other business partners, suppliers, and subcontractors with whom Mars Spor Kulübü works both domestically and internationally,
- (iii) All types of official authorities and institutions,
- (iv) Banks and/or institutions authorized for collection purposes, as well as domestic and international organizations and other relevant third parties with whom we collaborate to carry out activities related to these purposes.

2. To Whom and for What Purposes Personal Data May Be Disclosed

Mars Spor Kulübü transfers personal data to third parties solely for the purposes specified in this Policy and in accordance with Articles 8 and 9 of the Personal Data Protection Law (KVKK). In this context, processed Customer/Member data and information regarding the person to whom the purchased service will be provided are shared with shareholders, suppliers, public institutions and organizations, affiliates, and subsidiaries, and the call center may also access this data when necessary.

In accordance with their consent to receive commercial electronic communications, customer/member data is shared with a commercial electronic communication service provider to offer tailored benefits, opportunities, and advertisements based on shopping preferences and habits.

Usage preferences and browsing history on the Website and mobile applications are shared with third parties providing cookie services in order to communicate with the Customer/Member based on their preferences and interests. Personal data transfers carried out within this scope are conducted through the secure environments and channels provided by the relevant third party.

During the processing of personal data and its transfer both domestically and internationally, in addition to the implementation of the technical measures specified in this article to ensure the security of personal data, Mars Spor Kulübü ensures that the security of the data is also protected legally and contractually under the provisions of the Personal Data Protection Law (KVKK) included in the contracts entered into with third parties.

VI. Method of Collecting Personal Data

Mars Spor Kulübü may collect personal data in written, oral, audio, or video recording formats, or in other physical or electronic forms, for the purposes specified in this Policy, in accordance with the conditions set forth in Articles 5 and 6 of the Personal Data Protection Law (KVKK). In addition, personal data may be collected through channels such as the headquarters, branches, and other physical locations belonging to Mars Spor Kulübü where data subjects can make contact; call centers; websites; mobile applications; electronic transaction platforms; social media and other public platforms; events organized by the Club; sales and marketing units; customer forms; digital marketing; contracts; applications; forms; and offers; and through cookies used during website visits.

VII. Retention Period for Personal Data

Except in cases where there is a legal requirement or authorization to retain data for longer periods, Mars Spor Kulübü retains personal data that it has obtained and processed in compliance with this Policy and the Retention and Destruction of Personal Data Policy, in accordance with the Personal Data Protection Law (KVKK), and retains such data for the periods specified in the KVKK and other relevant laws.

Upon the expiration of the purpose of processing personal data and the expiration of retention periods determined by Mars Spor Kulübü in compliance with the KVKK and other applicable legislation, personal data is retained solely for the purpose of serving as evidence in potential legal disputes, to assert rights related to the personal data, and/or to establish a defense, or to present such data upon request by authorized official authorities. In determining the aforementioned periods, the statutes of limitations and retention periods specified in the relevant legislation regarding the assertion of the aforementioned rights are taken as the basis. In this case, personal data is not accessed for any other purpose, and access to the relevant personal data is provided only when it is necessary for use in the relevant legal dispute.

Mars Spor Kulübü meticulously monitors the specified periods, and personal data for which the aforementioned retention periods have expired are deleted, destroyed, or anonymized by Mars Spor Kulübü in accordance with the Personal Data Retention and Destruction Policy, as detailed in Appendix- Personal Data Retention and Destruction Policy, in accordance with the Personal Data Protection Law (KVKK).

For information regarding the retention periods of personal data collected through cookies, please refer to the Cookie Policy.

VIII. Security and Oversight of Personal Data

In accordance with Article 12 of the Personal Data Protection Law (KVKK), Mars Spor Kulübü, as the “data controller,” takes the necessary technical and administrative measures to ensure an appropriate level of security in order to prevent the unlawful processing of personal data and unlawful access to such data, and to ensure the protection of personal data. To this end, (i) operations are conducted in accordance with internal policies and rules established for the protection of personal data; (ii) employees are provided with the necessary training and assigned responsibilities regarding personal data protection legislation and the internal policies and rules developed in line with it; (iii) all necessary declarations and commitments regarding the confidentiality and protection of data are obtained from employees and from individuals and entities processing data on behalf of Mars Spor Kulübü; (iv) necessary information security measures are implemented to ensure the security of personal data both within and outside the company and to prevent unauthorized access to the 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 monitored, and new data security systems are procured and/or existing data security systems are developed and updated in accordance with needs and capabilities, and the necessary audits are conducted in this regard.

IX. Technical and Administrative Measures Taken by Mars Spor Kulübü Regarding the Protection and Security of Personal Data

Mars Spor Kulübü commits to taking all necessary technical and administrative measures and exercising due diligence to ensure the confidentiality and security of your personal data.

Mars Spor Kulübü takes the necessary precautions to prevent unauthorized access to personal data, its misuse, or the unlawful processing, disclosure, alteration, or destruction of personal data. Mars Spor Kulübü uses generally accepted security technology standards, such as firewalls and Secure Sockets Layer (SSL) encryption, when processing personal data. In addition, SSL is used when you submit your personal data to Mars Spor Kulübü via its website, mobile app, and mobile site.

Mars Spor Kulübü implements the following data security measures to prevent unauthorized access to the personal data it processes, to prevent the unlawful processing of such data, and to ensure the protection of personal data:

- Network and application security are ensured,
- A closed network system is used for the transmission of personal data over the network,
- Key management is implemented,
- Security measures are implemented in the procurement, development, and maintenance of information technology systems,
- The security of personal data stored in the cloud is ensured,

- Disciplinary regulations containing data security provisions for employees are in place,
- Training and awareness programs on data security are conducted for employees at regular intervals,
- An authorization matrix has been established for employees,
- Access logs are maintained on a regular basis,
- Corporate policies regarding access, information security, usage, retention, and disposal have been developed and implemented,
- Data masking measures are applied when necessary,
- Confidentiality agreements are executed,
- Authorizations for employees who change roles or leave the company are revoked,
- Up-to-date antivirus systems are used,
- Firewalls are in use,
- Signed contracts include data security provisions,
- Extra security measures are taken for personal data transmitted on paper, and the relevant documents are sent in a classified document format,
- Policies and procedures for personal data security have been established,
- Personal data security issues are reported promptly,
- Personal data security is monitored,
- The necessary security measures are taken regarding access to and from physical environments containing personal data,
- The security of physical environments containing personal data against external risks (fire, flood, etc.) is ensured,
- The 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 the backed-up personal data is also ensured.
- A user account management and authorization control system is in place, and these are monitored.
- Periodic and/or random internal audits are conducted and commissioned.
- Log records are maintained without user intervention.
- Current risks and threats have been identified.
- Protocols and procedures regarding the security of special-category personal data have been established and are being implemented.
- If special-category personal data is to be sent via email, it is always sent in an encrypted format using KEP or a corporate email account.
- Secure encryption and cryptographic keys are used for special-category personal data and are managed by separate units.
- Intrusion detection and prevention systems are in use.
- Cybersecurity measures have been implemented, and their application is continuously monitored.
- Encryption is performed.
- Penetration testing is conducted.

- Sensitive personal data transferred via removable storage devices, CDs, or DVDs is encrypted during transmission.
- Data security audits of data-processing service providers are conducted at regular intervals.
- Data security awareness is promoted among data-processing service providers.
- Data loss prevention software is used.

Even though the Company has taken the necessary information security measures, in the event that personal data is compromised or falls into the hands of unauthorized third parties as a result of attacks on platforms operated by the Company or the Company's systems through no fault of the Company, the Company will immediately notify the data subject and the Personal Data Protection Board of this situation and take the necessary measures.

X. Data Subject Rights Under the KVKK

With regard to personal data processed by Mars Spor Kulübü, the data subject has the following rights under Article 11 of the Personal Data Protection Law (KVKK):

- a. To learn whether their personal data is being processed,
- b. To request information if their personal data has been processed,
- c. To learn the purpose of the processing of their personal data and whether it is being used in accordance with that purpose,
- ç. To know the third parties to whom their personal data has been transferred, whether within or outside the country,
- d. To request the correction of their personal data if it has been processed incompletely or incorrectly,
- e. To request the erasure or destruction of your personal data under the conditions set forth in Article 7 of the KVKK,
- f. To request that the actions taken pursuant to subparagraphs (d) and (e) be notified to the third parties to whom their personal data has been transferred,
- g. To object to a decision made solely through the automated processing of their personal data that adversely affects them,
- h. To request compensation for damages incurred as a result of the unlawful processing of their personal data,

Data subjects who wish to exercise any of the rights set out above may submit the application form annexed to this Policy, together with information and documents verifying their identity, either in person or through a notary to the nearest branch office in wet-ink signed form; or may submit their application through the other methods set out in the Personal Data Protection Board's Communiqué on the Procedures and Principles Regarding Application to the Data Controller, published in the Official Gazette dated 10.03.2018 and numbered 30356, namely via a registered electronic mail (KEP) address, secure electronic signature, mobile signature, or the email address previously notified to the Company and registered in our systems.

Mars Spor Kulübü will evaluate and resolve requests received from data subjects in accordance with the proper procedures as soon as possible and, in any case, within 30 (thirty) days at the latest, depending on the nature of the request, in accordance with Article 13 of KVKK.

While data subjects' requests will generally be processed free of charge, if responding to a request entails additional costs, a fee may be charged in accordance with the amounts specified under relevant legislation.

XI. USE AND MANAGEMENT OF COOKIES

For detailed information about the cookies used by Mars Spor Kulübü, including cookie types, purposes, retention periods, and cookie management, please review the Cookie Policy.

XII. THIRD-PARTY WEBSITES, PRODUCTS, AND SERVICES

Mars Spor Kulübü's websites, platforms, and applications may contain links to third-party websites, products, and services. Such links are subject to the privacy policies of the third parties; third parties and their websites are independent of Mars Spor Kulübü, and Mars Spor Kulübü shall in no way be liable for the privacy practices of third parties.

XIII. AMENDMENTS

Mars Spor Kulübü reserves the right to make changes to this Personal Data Protection and Privacy Policy from time to time, in light of the provisions of the Regulation to be issued pursuant to the Personal Data Protection Law (KVKK) and other applicable legislation, and for other reasons not limited to these. The current version of the Policy will be published on Mars Spor Kulübü's websites and will remain accessible to users and members via these websites.

XIV. ENTRY INTO FORCE

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

APPENDIX: MARS SPOR KULÜBÜ PERSONAL DATA RETENTION AND DISPOSAL POLICY

1. Definitions

Relevant User	Individuals who process personal data within the data controller's organization or in accordance with the authority and instructions received from the data controller, excluding the person or unit responsible for the technical storage, protection, and backup of the data.
Destruction	This refers to the deletion, destruction, or anonymization of personal data.
Periodic Destruction	This refers to the process of deleting, destroying, or anonymizing personal data, which is carried out automatically at recurring intervals as specified in the personal data retention and destruction policy, when all conditions for processing personal data set forth in the law no longer apply.
Deletion of Personal Data	This is the process of rendering personal data inaccessible and unusable in any way by the relevant users.
Destruction of Personal Data	This is the process of rendering personal data inaccessible, irrecoverable, and unusable by anyone in any way.
Anonymization of Personal Data	The process of rendering personal data incapable of being associated with any identified or identifiable natural person, even when matched with other data.

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

The purpose of this Deletion and Destruction Policy is to ensure that Mars Spor Kulübü processes, stores, and protects the personal data of data subjects in compliance with the Law on the Protection of Personal Data ("Law" or "KVKK") and, even if such data has been processed in accordance with the provisions of the Law, and in cases where the reasons necessitating such processing no longer exist and the statutory retention periods have expired, to ensure that such data is deleted, destroyed, or anonymized in accordance with the KVKK and the Regulation on the Deletion, Destruction, or Anonymization of Personal Data, which constitutes secondary legislation under the KVKK and entered into force upon its publication in the Official Gazette No. 30224 dated October 28, 2017 ("Regulation")—to ensure that such data is deleted, destroyed, or anonymized in accordance with the Regulation.

This Deletion and Destruction Policy applies to activities related to the storage and destruction of personal data processed by Mars Spor Kulübü.

This Deletion and Destruction Policy has been developed and prepared in accordance with the KVKK, the “*Regulation on the Deletion, Destruction, or Anonymization of Personal Data*,” and other relevant legislation regarding the storage and destruction of personal data.

3. Activities Related to the Deletion, Destruction, and Anonymization of Personal Data Conducted by Mars Spor Kulübü

Personal data is retained by Mars Spor Kulübü only for the periods specified in the relevant legislation regarding retention and statutes of limitations and/or for as long as necessary to fulfill the purpose for which it was processed. Accordingly, Mars Spor Kulübü first determines whether the relevant legislation specifies any retention period and/or statute of limitations for personal data and retains such data in accordance with these periods. If no specific period is stipulated in the relevant legislation, personal data is retained in accordance with the KVKK and for as long as necessary to fulfill the purpose for which it was processed.

Mars Spor Kulübü, as stipulated in Article 7 of the KVKK, deletes, destroys, or anonymizes personal data—either on its own initiative or upon the request of the data subject—when the reasons necessitating its processing no longer exist and/or when the statutory retention periods have expired, in accordance with Articles 8, 9, and 10 of the “*Regulation on the Deletion, Destruction, or Anonymization of Personal Data*,” by deleting, destroying, or anonymizing the personal data.

In order to fulfill its obligations arising from laws and regulations, Mars Spor Kulübü has taken the necessary technical and administrative measures; has developed the required operational mechanisms in this regard; and is training its relevant units and assigning the necessary responsibilities to ensure compliance with these obligations.

4. Circumstances Requiring the Destruction of Personal Data

In accordance with the Personal Data Protection Law (KVKK) and the relevant regulations, personal data belonging to data subjects shall be deleted, destroyed, or anonymized by Mars Spor Kulübü, either on its own initiative or upon request, in the following cases:

- a. Amendments to or repeal of other statutory provisions governing the processing, storage, and retention periods of personal data, which eliminate the obligation to retain such data;
- b. The purpose requiring the processing or storage of personal data ceases to exist,
- c. The “Conditions for the Processing of Personal Data” specified in Articles 5 and 6 of the Law no longer apply.
- d. In cases where the processing of personal data is based solely on the condition of “explicit consent,” the data subject’s withdrawal of consent,
- e. The data controller’s acceptance of the data subject’s request for the erasure, destruction, or anonymization of their personal data, made within the scope of the rights referred to in subparagraphs (e) and (f) of Paragraph 2 of Article 11 of the KVKK,

- f. A decision by the Board regarding the erasure, destruction, or anonymization of personal data,
- g. The expiration of the maximum period requiring the retention of personal data, followed by the absence of any legal grounds justifying the retention of such data for a longer period,

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

Mars Spor Kulübü may use the following methods of erasure, destruction, and anonymization in accordance with the Personal Data Protection Law (KVKK):

- a. **Deletion Methods:** Depending on the nature of the personal data and the environment in which it is stored, Mars Spor Kulübü may use one or more of the following deletion methods: deletion via command from the database or redaction.
- b. **Destruction Methods:** Depending on the nature of the personal data and the environment in which it is stored, Mars Spor Kulübü may use one or more of the following destruction methods: physical destruction, demagnetization, or overwriting.
- c. **Anonymization Methods:** Mars Spor Kulübü uses one or more of the following anonymization methods to anonymize personal data, depending on the nature of the data, its volume, the structure of its physical storage, its diversity, the intended benefit from the data, and the purpose of processing: regional masking, variable removal, record deletion, generalization, lower and upper bound coding, global coding, sampling, data swapping, noise addition, micro-aggregation, data hashing, and data corruption.

6. Mars Spor Kulübü Personnel Involved in Personal Data Storage and Destruction Processes: Department, Title, and Job Descriptions

The Business Systems Manager and the Hardware & Systems Manager will be responsible for the storage, deletion, destruction, and anonymization of personal data in the database. The job descriptions for these positions have been established by Mars Spor Kulübü as follows:

Business Systems Manager

Department : Information Technology

Summary of Job Description : Planning and managing software needs in line with company strategies

Systems Administrator

Department : Information Technology

Summary Job Description : Managing the infrastructure and ensuring the security necessary for the smooth operation of applications and business systems used within the company

7. Retention and Destruction Periods

Data Category	Retention Period(s)	Relevant Legislation	Destruction Period
Personal Data Regarding Individuals/Members Who Purchase Products or Services	3 years in accordance with Law No. 6563 and related secondary legislation, and 10 years after the legal relationship has ended;	The Turkish Code of Obligations, the Law on the Regulation of Electronic Commerce, and relevant secondary legislation	Data is destroyed during the first periodic destruction following the expiration of the retention period.
All Records Related to Accounting and Financial Transactions	10 years	Turkish Commercial Code and Tax Procedure Code	Data is destroyed during the first periodic destruction following the expiration of the retention period.
Call Center Audio Recordings	3 years	Law on the Regulation of Electronic Commerce and related secondary legislation and the Law on the Protection of Consumers	They are destroyed during the first periodic destruction following the expiration of the retention period.
Membership and Purchase Records	10 years	Turkish Code of Obligations, Turkish Commercial Code, Law on the Protection of Consumers, and Tax Procedure Law	Data is destroyed during the first periodic destruction following the expiration of the retention period.
Commercial Electronic Communication Consent Records	3 years from the date the consent is revoked	Law on the Regulation of Electronic Commerce and related secondary legislation	Data is destroyed during the first periodic destruction following the expiration of the retention period.
Traffic Information Regarding Online Visitors	2 years	The Law on the Regulation of Publications Made	Data is destroyed during the first periodic destruction

		on the Internet and the Fight Against Crimes Committed Through Such Publications	following the expiration of the retention period.
Cookies	6 Months – Up to 2 Years	The Law on the Regulation of Publications Made on the Internet and the Fight Against Crimes Committed Through Such Publications	Data is destroyed during the first periodic destruction following the expiration of the retention period.
Supplier Data, Supplier Employee, and Supplier Authorized Representative	10 years after the legal relationship ends	Turkish Commercial Code, Tax Procedure Code	Data is destroyed during the first periodic destruction following the expiration of the retention period.
Employee Data	10 years from the termination of operations	Labor Code, Social Security and General Health Insurance Act	Data is destroyed during the first periodic destruction following the expiration of the retention period.
Job Applicant Data	The data of all job applicants whose application process resulted in a negative outcome is destroyed.	The data of all job applicants whose application process resulted in a negative outcome is destroyed.	The data of all job applicants whose application process resulted in a negative outcome is destroyed.
Visitor Data	2 Years from the End of the Visit	Personal Data Protection Authority's Personal Data Retention and Destruction Policy Published by the KVKK	Data is destroyed during the first periodic destruction following the expiration of the retention period.
Camera Footage	2 Years	Personal Data Protection Authority's Personal Data	Data is destroyed during the first periodic destruction following the

		Retention and Destruction Policy Published by the KVKK	expiration of the retention period.
Data Related to Job Applications/Internship Applications/Candidate Applications in Cases Where the Application Is Not Accepted (e.g., Resume, CV, Cover Letter, Application Form, etc.)	2 Years	Industry Practices	Resumes older than two years are destroyed electronically. For physical resumes, the retention period is 6 months.
Data Regarding Potential Customers	13 Months	European Union/Industry Practice	Data is destroyed during the first periodic destruction following the expiration of the retention period.

8. Technical and Administrative Measures Taken by Mars Spor Kulübü to Ensure the Secure Storage of Personal Data and to Prevent Its Unlawful Processing and Access

8.1.In General

8.1.1. Administrative Measures

- Disciplinary regulations containing data security provisions for employees are in place.
- An authorization matrix has been created for employees.
- Corporate policies regarding access, information security, use, storage, and disposal have been prepared and implemented.
- Confidentiality agreements are being executed.
- Authorizations in this area are revoked for employees who change roles or leave the company.
- Signed contracts include data security provisions.
- Personal data security policies and procedures have been established.
- Personal data security issues are reported promptly.
- Personal data security is monitored.
- Personal data is minimized as much as possible.
- Current risks and threats have been identified.

8.1.2. Technical Measures

- Network security and application security are ensured.

- A closed network is used for the transmission of personal data over the network.
- Key management is implemented.
- Security measures are in place for the procurement, development, and maintenance of information technology systems.
- The security of personal data stored in the cloud is ensured.
- Access logs are maintained on a regular basis.
- Data masking measures are applied when necessary.
- Up-to-date antivirus systems are in use.
- Firewalls are in use.
- The security of personal data is monitored.
- The necessary security measures are taken regarding access to and from physical environments containing personal data.
- The security of physical environments containing personal data against external risks (fire, flood, etc.) is ensured.
- The security of environments containing personal data is ensured.
- Personal data is backed up, and the security of the backed-up personal data is also ensured.
- A user account management and authorization control system is in place, and these are monitored.
- Log records are maintained without user intervention.
- Intrusion detection and prevention systems are in use.
- Cybersecurity measures have been implemented, and their enforcement is continuously monitored.
- Encryption is used.
- Penetration testing is conducted.
- Data loss prevention software is used.

8.2. Specifically

- i. Access to member data by membership services representatives working at the clubs is restricted within the relevant software; accordingly, to ensure data security, they do not have the authority to obtain bulk member lists from the software.
- ii. To ensure data security and enforce access restrictions, each club employee's access permissions are limited so that they can only access the member data of the club where they work.
- iii. Staff access permissions have been restricted on the company's main server.
- iv. At the clubs, a "deep freeze" system has been installed on the computers provided by Mars Spor Kulübü for public use, ensuring that downloaded files are deleted every time the computers are restarted. Additionally, these computers have been reconfigured to run only the Chrome and Explorer browsers for internet access.

- v. New encryption techniques have been implemented for staff computers, and a mandatory periodic password change policy is in effect.
- vi. USB ports and printing permissions on computers assigned to staff have been restricted. In the clubs, USB usage is permitted only for the club manager and on one designated computer.