

## ***Privacy and Cookie Policy***

### ***Privacy Policy***

At TT Danışmanlık (will be referred to as "the company"), we work to protect the privacy of our users (will be referred as the "data owner") visiting our website [www.talutrade.com](http://www.talutrade.com) operated by the company (will be referred to as "the platform") in order to ensure that they benefit from our services in a safe and complete manner. Consequently, this Company Privacy and Cookie Policy (will be referred to as "Policy") has been prepared in order to process the personal data of our users in full compliance with the Personal Data Protection Law No.6698 ("KVK Law") and to inform them within this context.

The purpose of this Policy is to ensure and determine the terms and conditions of the use of personal data shared during the visit of the platform by the data owner.

### ***Which Data are Processed?***

The data processed by the Company and considered as "personal data" in accordance with KVK Law are listed below. Unless otherwise explicitly stated, the term "personal data" within the scope of the terms and conditions provided in this Policy will cover the following information:

- ID information
- Contact information
- User information
- User transaction information
- Transaction security Information
- Marketing information
- Request / complaint Information

### ***Personal Data Processing Purposes***

The company uses the personal data provided by the data owner in order to create and keep membership account records, to facilitate the use of the services by the data owner on the platform, to detect system errors and to monitor performance and to improve the operation of the platform, to provide maintenance and backup services, to put in place marketing policies based on individual usage preferences of the platform by data owners, to help with the planning and execution of the company's strategic decisions by making sure that the necessary legal, technical and commercial framework in order to accomplish all these elements is complete and well protected.

### ***Personal Data to be Processed with the Data Owners' Explicit Consent and Processing Purposes***

Within the scope of the data owner's explicit consent, the Company follows the movements of the data owner on the platform to improve user experience, to create statistics, to profile, to conduct marketing activities, to create and offer promotional suggestions specific to the data owner. The company will be able to process data for use in all kinds of advertising and material content and share this data with the parties mentioned below.

### ***Transfer of Personal Data:***

The company, in order to improve data owner's experience, to ensure private data security , to detect fraudulent or unauthorized use, to eliminate errors related to platform services, and to realize any of the purposes stated in the Privacy Policy may transfer the personal data belonging to the data owner and the new data obtained by using this personal data to its third party service providers such as providers of SMS services, hosting services, law firms, research companies, call centers etc. in order to achieve the purposes specified in the Privacy Policy, but with the transfer being limited only against the provision of such services.

Personal data can be shared with the company, company officials, shareholders, business partners, suppliers, legally authorized public institutions and organizations and legally authorized private institutions within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the KVK Law. The data may also be transferred overseas within the framework and boundaries of the Article 9 of the law relating to the procedural principles and to the decisions of the Personal Data Protection Board.

### ***Personal Data Collection Method and Legal Reasoning***

Personal data is collected from the platform and in the electronic environment. Personal data collected for the above-mentioned legal reasons can be processed and transferred for the purposes specified in Articles 5 and 6 of the KVK Law No. 6698 and in this Privacy Policy.

### ***Cookie Policy***

As a company, we strive to protect the privacy of those who use our site to ensure that our users benefit from our services safely and completely.

As with most websites, Cookies are used to display personal content and advertisements to visitors, to perform analytical activities within the platform and to track visitor usage habits.

This Cookie Policy is an integral part of the Company's Privacy Policy.

The company has prepared this Cookie Policy to explain which cookies are used on the platform and how users can manage their preferences in this regard.

For more detailed information about the processing of your personal data by the company, we recommend that you review our [Privacy Policy](#).

### ***What are "Cookies"?***

Cookies are small text files stored by the websites you visit, and they are created by servers associated with these websites. Thus, when the visitor visits the same site, the server can understand this. Cookies do not contain personal data such as name, gender, or address of the visitor. For more detailed information on cookies, you can visit [www.allaboutcookies.org](http://www.allaboutcookies.org) or [www.aboutcookies.org](http://www.aboutcookies.org)

### ***What type of Cookies Are Used?***

Cookies can be categorized in terms of their ownership, lifetime, and purpose of use:

- Depending on the party placing the cookie, platform cookies and third-party cookies are used. While platform cookies are created by the Company, third party cookies are managed by different companies that are in cooperation with the Company.
- Session cookies and persistent cookies are used depending on the time the cookie is active. While session cookies are deleted after the visitor leaves the platform, permanent cookies can remain on the visitors' devices for various periods depending on the area of use.
- According to the purpose of use, technical cookies, verification cookies, targeting / advertising cookies, personalization cookies and analytical cookies are used on the Platform.

### ***Why Are Cookies Used?***

On the Platform, Cookies are used for the following purposes:

- To realize the basic functions required for the platform to work e.g. making sure products in the visitor's basket remain, to remember the password of a logged-in member, while visiting different pages on the Platform.
- Analyzing the Platform and increasing the performance of the Platform e.g. integration of the different servers that the Platform works on, determining the number of visitors to the Platform and making performance settings accordingly or making it easier for visitors to find what they are looking for.
- Increasing the functionality of the platform and providing ease of use e.g. remembering the username information or search queries on the following visits to the Platform by the visitors.
- To perform personalization, targeting and advertising activities. e.g. displaying ads related to the interests of the visitors on the pages and products viewed by them.

### ***How Can You Manage Your Cookie Preferences?***

The company attaches great importance to its users' ability to use their preferences on how their personal data is being managed. However, preference management is not possible for some cookies that are mandatory for the platform to work. We would also like to remind you that if some cookies are turned off, various functions of the platform may not work.

Information on how to manage preferences for Cookies used on the platform is as follows:

- Visitors can customize their preferences for cookies by changing the browser settings on which they view the Platform. If the browser in use offers this opportunity, it is possible to change the preferences for cookies through the browser settings. Thus, although it may differ according to the possibilities offered by the browser, data owners have the opportunity to prevent the use of cookies, to choose to receive a warning before the cookie is used, or to disable or delete only some Cookies. Although the preferences on this subject vary according to the browser used, a general explanation is available at <https://www.aboutcookies.org/>. Cookies preferences may need to be made separately for each device that the visitor accesses the platform.

- [Click to turn off Cookies managed by Google Analytics.](#)

- [Click to manage the personalized advertising experience provided by Google.](#)

- The settings menu of the mobile device can be used to manage Cookies on mobile devices.

### ***What Rights Do You Have as a Data Owner?***

Pursuant to Article 11 of the Law No.6698 on the Protection of Personal Data, data owners can request the following from the company:

- Whether their personal data is being processed,
- Request that information if their personal data has been processed,
- Learn the purpose of processing their personal data and whether they are used appropriately for their purpose,
- Learn about the third parties to whom personal data are transferred to domestically or abroad,
- Request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data are transferred to.
- Request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear, despite the fact that it has been processed in accordance with the provisions of the law and to request notification of the transaction made within this scope to third parties to whom personal data has been transferred to.
- In case of damage due to unlawful processing of personal data, data owner has the right to demand compensation for the damage.

All requests communicated by the data owner conformingly to the methods mentioned in the KVK Law will be evaluated and concluded within 30 (thirty) days. Although in principle no fee shall be charged for these requests, the Company reserves the right to charge a fee based on the fee schedule determined by the Personal Data Protection Board.

[\*\*General Data Protection Application Form\*\*](#)

### ***Consent and Changes to the Privacy Policy***

- The Company's Privacy Policy aims to provide its users with detailed explanations about the scope and purposes of the use of Cookies and to inform users about their Cookie preferences.

In this regard, if the Cookie information warning on the Platform is closed and the use of the Site continued, the consent for the cookie policy will be presumed. The ability of users to change their Cookie preferences is always reserved.

- The Company may change the terms of its privacy policy at any time. The Current Policy becomes effective on the date it is published on the platform.

We recommend you reading of TT Danışmanlık A.Ş.'s [\*\*Personal Data Protection and Processing Policy\*\*](#).