**CLARIFICATION TEXT REGARDING THE PROCESSING OF PERSONAL DATA**

Your personal data is collected verbally or in writing and processed by Λευκωσία Επενδύσεις σε ακίνητα Διαχείριση κατασκευών και εμπόριο. within the scope of the marketing and sales operations of the Apate Cyprus Estate.

This Clarification Text has been drawn up for the purpose of informing you about the rules governing the processing of your personal data and your rights in relation to the processing, in accordance with the Personal Data Protection Law numbered 6698 (“**PDPL**”).

Λευκωσία performs such processing operations in compliance with the principles of lawfulness, good faith, accuracy and up-to-datedness when required, processing for specific, explicit and legitimate purposes, data minimization, purpose limitation, proportionality and storage limitation (retaining the data for the period of time stipulated in the applicable law as required for the intended purpose of processing).

1. **Data Processed**

Λευκωσία processes the data subject’s identification, communication, citizenship information, Turkish National ID number/passport number, ‘mersis’ number, photograph, bank account information, date of birth, education, employment, marital status, monthly income information and all other data that do not fall under these categories (data required for operations regarding marketing and sales, such as order, payment, visit information etc.).

1. **Legal Grounds and Purposes for Processing**

Your personal data is processed through automated or non-automated means in accordance with the legal grounds set forth under Article 5 of the Law, which are when processing is “clearly provided for by the laws”, “necessary regarding the processing of personal data belonging to the parties of a contract, provided that it is directly related to the conclusion or fulfillment of that contract”, “necessary for compliance with a legal obligation to which the controller is subject” and “necessary for the establishment, exercise or protection of any right”.

Personal data are processed within the scope of the purposes mentioned hereunder:

* Conducting Contractual Processes
* Fulfilling Legal and Administrative Obligations
* Follow-up and Execution of Legal Affairs
* Conducting Communication Operations
* Execution of Occupational Health/Safety Operations
* Conducting Goods/Services Procurement Processes
* Conducting Support Services Following the Sales of Goods/Services
* Management and Execution of Customer Relationship Processes
* Management of Operations Regarding Customer Satisfaction
* Conducting Marketing Analysis Operations
* Execution of Advertising/Campaign/Promotion Processes
* Follow-up of Requests/Complaints
* Execution of Marketing Processes of Products/Services
* Providing Information to Authorized Persons, Institutions and Organizations
* Logging and Tracking Visitor Records
* Ensuring the Security of Physical Environment

1. **Transfer of Personal Data to Third Parties**

The procedures and principles that govern personal data transfers are regulated under Articles 8 and 9 of PDPL. Within the scope of the purposes mentioned above, personal data may be transferred to be shared with third parties which are the shareholders, affiliates and subsidiaries, group companies, business partners, suppliers of Λευκωσία, and other authorized public institutions and organizations, domestically or abroad.

Provided that legal requirements are complied with, Λευκωσία may process and transfer special category personal data under Article 6 of the PDPL.

1. **Processing Period**

Data controller Λευκωσία shall process personal data for the period of time specified under the VERBİS system, depending on the category of data processed.

1. **Data Subject Rights**

Pursuant to Article 11 of the Law, you have the right to submit a request to Λευκωσία about the processing of your personal data regarding the matters set forth hereunder:

1. Being informed about whether your personal data is being processed or not,
2. If your personal data has been processed, requesting information regarding such processing,
3. Being informed about the intended purpose of the processing of your personal data and whether such data is used within the scope of the intended purpose,
4. Being informed about third parties to whom your personal data has been transferred domestically or abroad,
5. Requesting rectification or completion of your personal data if the data is processed inaccurately or incompletely, and requesting notification of the rectifications made in this respect to third parties to whom the personal data might have been transferred,
6. In the event where the grounds for processing of personal data are no longer present, requesting the erasure, destruction or anonymization of your personal data and requesting notification of the operations carried out in this respect to third parties to whom the personal data might have been transferred,
7. Filing an objection against any unfavorable outcomes emerging from the analysis of your personal data solely through automated means,
8. Claiming compensation for any damages arising from the unlawful processing of your personal data.
9. **Application Procedure**

Requests shall be forwarded in writing to the formal address of Λευκωσία at Basilissis Phreiderikis, 20, EL GRECO HOUSE, Floor 1, Flat/Office 104 1066, Leukosia, Cyprus via the notary public. Any requests made via e-mail shall be forwarded to [support@apatecyprusestate.com](mailto:support@apatecyprusestate.com) by utilizing the registered electronic mail (KEP) address, secure electronic signature, mobile signature or the requesting party’s e-mail address registered at Λευκωσία, or, if applicable, by means of the software or application developed for this purpose at <http://apatecyprusestate.com> website.

The requests submitted accordingly shall be drafted using the application form attached below, written explicitly and clearly to be understood beyond any doubt, with the identification and relevant documents and information attached to the application. For requests submitted on behalf of others, identification and address information of the requester and the legal documents demonstrating the authorization to represent the requesting party must be provided.

Applications to be made in this respect shall be concluded as swiftly as possible, in any case within no longer than 30 (thirty) days in accordance with Article 13 of the PDPL. If the request is denied, you shall be informed of the grounds for the rejection with its justifications in writing or via electronic means. If the application consists of incomplete information and documents, the time frame for responses shall commence from the date on which the incomplete information and documents are completed. Applications are currently free of charge. However, if the operation requires any additional cost, the fee provided in the tariff set out by the Personal Data Protection Board may be applicable.

Responses to applications can either be sent to the requesting party’s address by any type of mail, or via e-mail according to Λευκωσία preference.

This Clarification Text shall be subject to revision by Λευκωσία in cases deemed necessary.

**APPLICATION FORM REGARDING PERSONAL DATA**

1. **Contact Information of the Data Subject**

|  |  |
| --- | --- |
| **Name - Surname** |  |
| **Cyprus National ID Number/Nationality - passport number or ID number for foreigners** |  |
| **E-mail Address** |  |
| **Home or business address for formal notifications** |  |
| **Telephone Number** |  |

1. **Requests to be Made by the Data Subject**

Please choose the subject matter of your application regarding your personal data from the options available as listed hereunder:

|  |  |  |
| --- | --- | --- |
|  | **Subjects for Request and Legal Grounds** | **Your Choice** |
| **1** | I would like to be informed about whether my personal data is being processed or not.  ***(Personal Data Protection Law Art. 11/1 (a))*** |  |
| **2** | If my personal data is being processed, I request information regarding such processing.  ***(Personal Data Protection Law Art. 11/1 (b))*** |  |
| **3** | If my personal data is being processed, I would like to be informed about the intended purpose of the processing of my personal data and whether such data is used within the scope of the intended purpose.  ***(Personal Data Protection Law Art. 11/1 (c))*** |  |
| **4** | I request information on whether my personal data is transferred to any third parties domestically and/or abroad, and if transferred, on the third parties to whom my data is transferred to.  ***(Personal Data Protection Law Art. 11/1 (ç))*** |  |
| **5** | I request the rectification of my personal data that is either incomplete or processed inaccurately by the third parties to whom my corporate / personal data is transferred.  *(If requested, accurate and complementary information/documents must be submitted in order to rectify your personal data that you consider to be incomplete or inaccurate.)*  ***(Personal Data Protection Law Art. 11/1 (d))*** |  |
| **6** | I believe that the grounds that necessitate the processing of my personal data are no longer present, and, accordingly, I hereby request my personal data to be;   |  |  | | --- | --- | | * + - Erased |  | | * + - Destroyed |  | | * + - Anonymized |  |   *(please indicate your choice by putting an x mark.)*  ***(Personal Data Protection Law Art. 11/1 (e))*** |  |
| **7** | I would like my personal data I consider to be incomplete or processed inaccurately (Request No: 5) to be rectified by the third parties to which such data is transferred.  ***(Personal Data Protection Law Art. 11/1 (f))*** |  |
| **8** | I would like my personal data I consider to be incomplete or processed inaccurately (Request No: 5) to be;   |  |  | | --- | --- | | * + - Erased |  | | * + - Destroyed |  | | * + - Anonymized |  |   by the third parties to which such data is transferred.  *(please indicate your choice by putting an x mark.)*  ***(Personal Data Protection Law Art. 11/1 (f))*** |  |
| **9** | I hereby object to any unfavorable outcomes emerging from the processing and analysis of my personal data solely through automated means.  ***(Personal Data Protection Law Art. 11/1 (g))*** |  |
| **10** | I hereby request compensation for the damages I have suffered due to unlawful processing of my personal data.  ***(Personal Data Protection Law Art. 11/1 (h))*** |  |

1. **Explanation of Relationship to Λευκωσία (it would be helpful in the process of reviewing your request and ensuring the swiftest response if you disclose whether your relationship to Λευκωσία that required your personal data to be processed is through employment or any other means.)**