

CANİKAPP
PRIVACY NOTICE ON
PROTECTION OF PERSONAL DATA

As Samsun Yurt Savunma Sanayi ve Ticaret Anonim Şirketi (“**Canik**”), we pay the utmost attention to act in compliance with the Turkish Personal Data Protection Law numbered 6698 (“**Law**”) as well as the European data protection law, in particular with the General Data Protection Regulation (“**GDPR**”) and the relevant secondary legislations.

The purpose of this privacy notice is to inform CanikApp users regarding processing of their personal data. Please read this privacy notice carefully before proceeding to use CanikApp.

1)Responsibility for Data Processing

Canik, as controller within the meaning of the Law and GDPR, is responsible for the lawfulness of the processing of your personal data. You can contact us at any time using the following contact details:

Samsun Yurt Savunma Sanayi ve Ticaret Anonim Şirketi

Address: Şabanoğluosb Mahallesi Ulubatlı Cad. No: 2 B/B Tekkeköy/Samsun

Phone: +90 (362) 266 66 71

E-mail address: kvkk@canikarms.com

You may also contact our EU Representative:

Hogan Lovells International LLP

Karl-Scharnagl-Ring 5

80539 Munich, Germany

E-Mail address: eurepresentative.canikarms@hoganlovells.com

You may also contact our Data Protection Officer:

E-Mail address: dpo@canikarms.com

1)Categories of Personal Data collected

Personal data collected when you log-in to CanikApp as guest without signing up (“guest data”):

If you prefer to use the application as guest without creating a user account, your choices of country and application language are processed.

Personal data collected when you sign up to CanikApp (“user data”). In connection with your registration with the Canik App your name, surname, mobile phone number, country of residence, time zone and e-mail address are processed. If you wish to log in via Facebook and Gmail without entering a mobile phone number, Canik gains access to your name, surname and e-mail address via these platforms. Once you have selected the display language your choice of language is processed as well as user data.

Personal data collected when you create a Canik ID (“profile data”). Although it is not required for usage of the application, you can at your own discretion create a Canik ID. In order to so, you can upload a profile picture by granting CanikApp access to your photos and/or camera; set a username (nickname); and enter your identity number, the city-district you reside in, your nationality, date of birth, gender,

passport number, delivery address, invoice address and information about the Canik weapons you own. Your nationality, identity number and passport number are also requested for security checks required by Canik Academy. You can also view in your profile certificates of the courses you have completed at Canik Academy.

Personal data collected while you use CanikApp (“usage data”). In connection with the use of CanikApp, your session history will be processed. If you give your explicit consent, your past shopping habits and preferences will also be processed.

Personal data collected while you use the shot timer feature (“shot timer data”). In connection with the use of the shot timer feature, the model of your weapon, the sounds recorded through the microphone during shooting, the total duration of your shooting, the recording date and the sensitivity value will be automatically processed. To use this feature, you need to allow microphone access. It is at your discretion whether to save shot results or not. If you choose not to do so, the results will be directly deleted and not processed by Canik.

Data in relation to your device (“device data”). The below-mentioned device data is processed and collected from your mobile device connected to the internet while you use CanikApp; regardless of whether you have created a CanikApp account or not:

Device properties: the brand, model, name and version of the operating system (such as IOS or Android) of your device, the internet browser used, device identifier (device ID)

Data obtained from device properties: Your location information if you turn on GPS location services on your mobile device

Network and connection data:

Internet protocol (IP) number used while downloading the application

If you have given your consent to Canik and you allowed CanikApp to access your GPS location your location data will be processed.

1)Purposes and Legal Grounds for Processing Personal Data

Your above-mentioned personal data is processed for the following purposes and based on the following legal grounds:

Guest data is processed for the purpose of our legitimate interest to determine the display language and it is also processed to send you notifications in relation to the Canik events, products and services that are close to your location upon obtaining your consent to this effect.

User data is processed to create a CanikApp user account, to create your membership, to send you a welcome e-mail, to confirm your user identity, to address complaints, requests and all kinds of information requests, to provide you with information about amendments made in the privacy notice or in the CanikApp, to improve the user experience in the CanikApp, to put the application into use, to determine display language for the performance of the user agreement you entered into with Canik. User data may also be processed for our legitimate interest to determine whether you have previously benefited from any other product or service of Canik (such as the Canik Academy). In addition, if you explicitly consented to receiving commercial electronic messages (e.g. SMS, push notifications and e-mails) for marketing and publicity purposes, your user data will be processed for the purposes of carrying out communication activities, sending advertisement/promotion/special offers, product marketing and publicity and displaying you content related with such products and services (for instance the list of courses you have previously completed at Canik Academy). If you wish to log in via Facebook and

Gmail without entering a mobile phone number your user data is also processed for the purpose of our legitimate interest in confirming your user identity.

Profile data is processed for the purposes of our legitimate interest regarding the creation of your Canik ID in the application, improving the user experience in CanikApp, providing specific functions of the application, carrying out financial and accounting transactions in case you purchase Canik accessories via CanikApp from the Canik website, payment transactions and for the delivery of the products. If you have given your explicit consent your profile data will also be processed for segmentation and profiling analysis purposes based on your consent.

Usage data is processed for the purposes of our legitimate interest in order to put the application into use. Your usage data is also processed based on your explicit consent if you have given it to Canik for the purpose of planning the marketing strategy, segmentation, profiling and preparation of reports to this effect. Segmentation and profiling are used to determine the best/worst selling product categories, carry out product improvement projects, analyse user preferences (for example, analysis of users by age, gender, and interest categories), provide content for users with the potential to buy a product, give promotions based on data driven predictive models, increase sales potential and develop the marketing strategy.

Shot timer data will be processed for the purpose of our legitimate interest providing this feature to you. Your shot results will be processed by Canik for the purposes of our legitimate interest increasing the functionality of the application, user satisfaction and meeting user demands.

Device data is processed for the purposes of developing and updating CanikApp services, addressing your complaints and requests, resolving any technical problems you encounter while using CanikApp, and improving user experience. If you are registered as a user, device data is processed for the performance of your user agreement. If you use CanikApp without registration, device data is processed based on our legitimate interest in pursuing the purposes above.

If you consented to the collection and processing of GPS location data and to us sending electronic messages for marketing and publicity purposes, you will be able to receive messages regarding Canik events, products and services close to your location.

1) Sources and Methods for Collecting Your Personal Data

The above-mentioned guest, user and profile data are collected directly from you as you sign up to CanikApp, log in as guest and create your Canik ID. If you grant CanikApp access to your location and turn your microphone on while using the shot - timer feature, data will be automatically collected via the application. Usage data and device data are also automatically collected via the application. If you login via Facebook and Gmail and grant your permission, your name, surname and e-mail address information are accessed through these platforms.

1)Recipients of Your Personal Data

Your personal data is transferred to a supplier for the purposes of improving quality of Canik services, meeting technical requirements, and providing personalized and behavioural advertisements serving your interest and data storage; and to another supplier that provides IT consulting services in order to receive IT related support.

In addition, your personal data can be transferred to our legal consultants in order to ensure that the processes are carried out lawfully and to carry out legal affairs.

Your personal data may also be transferred to judicial authorities or relevant law enforcement officers upon request in accordance with the relevant legislation.

Requests from public institutions will also be addressed in accordance with the legislation.

1)Data Processing outside the EU/EEA

Your personal data is processed by the service providers and other data recipients listed in Section 5 of this privacy notice above. These service providers and other data recipients that may be located in countries outside the European Union/the European Economic Area ("Third Countries"), in particular in Turkey. Where recipients are based in Third Countries which do not provide a level of data protection as considered adequate to the European Union (as demonstrated by an adequacy decision adopted by the European Commission), we have implemented appropriate safeguards according to applicable data protection laws, namely Standard Contractual Clauses, ensuring that the data processed by such recipient is adequately protected with a level of data protection comparable to the European Union. For more information on the recipients and Third Countries concerned, the safeguards implemented, and for obtaining a copy of these safeguards, please contact us at the contact details set out above.

1)Protection of Your Personal Data

We take reasonable steps including appropriate technical and organizational measures to ensure that your personal data is adequately protected, in particular against unauthorized access, unauthorized disclosure, or use, and accidental or unlawful destruction, loss, alteration or deletion of your personal data. Our security measures are continuously revised and adapted in line with technological developments.

2)Storage of Your Personal Data

We will store your personal data only for the period necessary to fulfil the purposes for which we have collected and processed your personal data as outlined in this privacy notice. After the corresponding storage period has expired, your data will be deleted in accordance with our data retention policy, unless statutory retention obligations (in particular due to commercial and tax law requirements) preclude this or prolonged storage is necessary in the specific individual case for the purposes of our legitimate interests (interest in fulfilling our legal obligations and the necessity of processing for the establishment, exercise or defence of legal claims).

3)Your Rights

Subject to the statutory provisions, including the corresponding local laws, you have a number of rights in connection with our processing of your personal data, which we will outline in more detail below. To exercise your rights, including the right to withdraw your consent, please contact Canik using the contact details listed at the beginning of this Privacy notice.

You have the rights as set out in Article 11 of the Law as well as the following rights regarding your personal data:

(i) access: Subject to the statutory provisions, you have the right to request access to your personal data processed by us and a copy of this data (right of access);

(ii) rectification: Subject to the statutory provisions, you have the right to have any incorrect data rectified and, taking into account the purposes of the processing, to have incomplete personal data completed (right to rectification);

(iii) erasure: Subject to the statutory provisions, you have the right, if there are justified grounds, to request the erasure of your data (right to erasure);

(iv) restriction of processing: Subject to the statutory provisions, you have the right to request the restriction of processing of your data, provided that the statutory prerequisites apply (right to restriction of processing);

(v) data portability: Subject to the statutory provisions and provided that the statutory prerequisites apply, you have the right to receive the data provided by you in a structured, commonly used and machine-readable format and to transmit those data to another controller or, to the extent that this is technically feasible, have them transmitted by us (right to data portability);

(vi) right to object: Subject to the statutory provisions, you have the right, on grounds relating to your particular situation, to object to any processing of your data for the purposes of legitimate interests pursued by us or a third party (right to object). If data is processed by us for direct marketing purposes, you have the right to object at any time to such processing without any particular reasons being required;

(vii) automated individual decision-making: You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, provided the statutory prerequisites do not apply. We do not conduct an automated decision-making;

(viii) withdrawal of consent: If the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of your consent will not affect the lawfulness of processing your personal data based on consent before this consent was withdrawn;

(ix) complaint: Notwithstanding any other remedies, you are also entitled anytime to file a complaint with Turkish Data Protection Authority.

1)Amendments to the Privacy Notice

We reserve the right to amend this privacy notice in the future if our practices regarding the handling of your personal data change. You can access and review the respective applicable version of this at any time via the Canik App.

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