

P GROUP

Stillnook Personal Data Protection and Processing Policy

1. Introduction

Stillnook attaches great importance to the protection of personal data. This policy establishes the fundamental principles and practices regarding the protection of personal data collected and processed by Stillnook.

2. Scope

This policy encompasses all personal data processing activities conducted by Stillnook. Within this scope, all personal data collected and processed by Stillnook are subject to this policy.

3. Definition of Personal Data

Personal data refers to any information relating to an identified or identifiable natural person. Within this scope, information such as name, surname, national identification number, address, telephone number, email address, IP address, photograph, video, shopping habits, health information, etc., can be considered as personal data.

4. Collection and Processing of Personal Data

Stillnook may collect and process personal data from customers, employees, business partners, and other third parties through various means. The methods used by Stillnook for the collection and processing of personal data include:

- From Customers: Stillnook may collect personal data from customers during activities such as purchasing products and services, visiting the website, contacting customer service, etc. Personal data collected by Stillnook in this scope includes:

- o Customer name, surname, national identification number, address, telephone number, email address

- o Customer payment information

- o Customer shopping habits

- From Employees: Stillnook may collect personal data from employees during activities such as recruitment, employment contracts, personnel files, performance evaluations, etc. Personal data collected by Stillnook in this scope includes:

- o Employee name, surname, national identification number, address, telephone number, email address

- o Employee education information

- o Employee work experience information

- o Employee performance evaluation information

- From Business Partners: Stillnook may collect personal data from business partners within the

scope of business relationships. Personal data collected by Stillnook in this scope includes:

- o Business partner name, surname, national identification number, address, telephone number, email address
- o Business partner contact information
- o Business partner financial information
- From Other Third Parties: Stillnook may collect personal data from other third parties for reasons such as legal obligations, commercial activities, etc. Personal data collected by Stillnook in this scope includes:
 - o Customer complaints and requests
 - o Contracts with business partners
 - o Requests from competent authorities

5. Purposes of Personal Data Processing

Stillnook may use the personal data collected and processed for the following purposes:

- Customer service: Stillnook may use personal data to provide information to customers about products and services, evaluate customer complaints and requests, etc.
- Sales and marketing: Stillnook may use personal data to promote its products and services, offer special deals to customers, etc.
- Finance and accounting: Stillnook may use personal data for purposes such as the sale of products and services, collection of customer payments, etc.
- Business processes: Stillnook may use personal data to carry out human resources, logistics, accounting, etc., business processes.
- Legal obligations: Stillnook may use personal data to fulfill legal obligations.

6. Transfer of Personal Data

Stillnook may transfer the personal data collected and processed to third parties in the following cases:

- To competent authorities: Stillnook may transfer personal data to competent authorities due to legal obligations.
- To business partners: Stillnook may transfer personal data to business partners within the scope of contracts.
- To service providers: Stillnook may transfer personal data to third parties from whom it receives services to provide its products and services.

7. Security of Personal Data

Stillnook takes necessary technical and administrative measures to ensure the security of personal data. Measures taken by Stillnook for security include:

- Technical measures: Stillnook takes necessary technical measures to protect personal data.

Measures taken by Stillnook include:

- o Measures are taken to protect personal data from unauthorized access, use, disclosure, alteration, or destruction.
- o Personal data is regularly checked to ensure an appropriate level of security.
- o Personal data can only be accessed by authorized personnel.
- Administrative measures: Stillnook takes necessary administrative measures to protect personal data. Measures taken by Stillnook include:
 - o Employees receive necessary training on the collection and processing of personal data.
 - o Awareness campaigns are conducted regarding the security of personal data.
 - o Policies and procedures regarding the security of personal data are established.

While Stillnook takes necessary measures to ensure the security of personal data, it is not entirely responsible for the security of personal data. The security of personal data is also the responsibility of the users. Therefore, users should take necessary measures to protect their personal data.

8. Right to Access and Rectify Personal Data

Users have the right to access and rectify the personal data processed by Stillnook. Within the scope of this right, users can request Stillnook to inform them about their personal data, correct their personal data if it is incomplete or incorrect, delete or destroy their personal data, transfer their personal data, and object to the processing and transfer of their personal data. Stillnook will evaluate the personal data requests of users in accordance with the relevant legislation and resolve them as soon as possible.

9. Right to Complaint

Users can lodge complaints regarding the processing of their personal data to Stillnook or the Personal Data Protection Board in accordance with the relevant legislation.

10. Effectiveness and Amendments

This policy is effective as of the date published by Stillnook. Stillnook may amend this policy without prior notice if necessary.