

EMAAR SQUARE MALL

CLARIFICATION TEXT FOR THE PROCESSING AND PROTECTION OF PERSONAL DATA

As Emaar, we give utmost importance to the confidentiality and security of personal data. In that regard, with this Clarification Text ("**Clarification Text**"), we would like to inform you as Emaar Libadiye Gayrimenkul Geliştirme A.Ş. ("**Emaar**" and/or "**Company**") in our capacity as data controller about processing of your personal data in accordance with the applicable legislation ("**Legislation**") including specifically Law No. 6698 on Protection of Personal Data ("**KVKK**") and Law No. 6563 on the Regulation of Electronic Commerce ("**ETK**").

You may have access detailed information about purposes of processing of your personal data in the Emaar Group Policy for Protection of Personal Data available at the address www.emaarsquaremall.com

Your Personal Data Processed

Pursuant to KVKK, all kinds of information relating to a real person who was identified or identifiable is defined as "personal data" and all sorts of procedures carried out on the data such as extraction, recording, storage, safe-keeping, alteration, rearrangement, disclosure, transfer, acquisition, rendering obtainable, classification and prevention of utilization of personal data by automated means or non-automatic methods in part or in whole provided that they are part of any data recording system are called "processing of personal data". In that regard, your personal data processed by Emaar will be as follows:

- **Your Identification Data** (name, surname, birth date, civil status)
- **Your Contact Data** (e-mail address, home phone number, work phone number, GSM number, home address, work address)
- **Your Financial Data:** As part of Emaar Loyalty Program ("**Loyalty Program**"), if you upload voucher/invoice/e-archive invoice to Emaar Mobile Application in connection with your shopping at different stores of Emaar, your shopping details indicated on the voucher/invoice/e-archive invoice that you uploaded and amount spent by you will be processed. Your bank details for the credit card used in your payment, last 4 digits of your credit card and credit card score details will be processed. Name/surname appearing on the credit card used for payment will be also processed to ensure accuracy of the spending.

Purposes of Processing of your Personal Data and Legal Reason

In line with the fundamental principles set forth in KVKK, your personal data mentioned above will be processed by Emaar for the following purposes and based on your explicit consent required under article 5/2 of KVKK:

- Offering you various awards, enabling you to earn points and granting you drawing right under the campaign you will participate,
- Providing you with better services, offering various advantages, providing information about sales, marketing, and promotions, providing information about campaigns and their conditions, performing surveys and carrying out customer satisfaction researches,
- Traffic measurement, statistical and analytical analyses, profiling/segmentation procedures that will be executed for the sales and marketing activities and for providing you with the offers relating to the customized products and services through targeting and re-targeting,

- Execution of profiling and analysis activities; suggesting and introducing to you those products and services after customizing them according to your preferences, usage habits and requirements,
- If you are included in the Loyalty Program, carrying out profiling/segmentation, targeting and retargeting procedures based on the information you shared with Emaar;
- Communicating with you by using your contact data in connection with all services and products offered by Emaar ((for example AVM, Aquarium, residence etc.) and providing your information and data for the purpose of making introductions and marketing through phone, SMS, e-mail and digital channels provided that you granted your consent for this,
- Planning and executing corporate communication activities,
- Defining our commercial and business strategies,
- Executing our customer services/relations and evaluating customer satisfaction and carrying out relevant statistical studies,
- Keeping statistics for the customers in order to enhance our efficiency in our sales, marketing and customer services,
- Execution of introduction and marketing activities for all products and services offered by Emaar; making you suggestions about these products and services; planning and/or execution of market research activities for the sale and marketing of these products and services.

Parties to whom your Personal Data are Transferred and Purposes of Transfer

In line with the fundamental principles set forth in KVKK and pursuant to article 8/1 of KVKK, your personal data processed by Emaar may be transferred to the local persons and legal entities from whom Emaar procures services and/or consulting support and our suppliers, service providers and business partners with whom we are bound with confidentiality obligations and to the same operating at abroad provided that you granted your explicit consent as per article 9/1 of KVKK for the purpose of providing services and products or performing a contract and also for above mentioned purposes provided that you had granted your explicit consent to us as mentioned above. Besides that, your personal data may be transferred to the legal and judicial authorities and authorized private persons pursuant to article 8/2 of KVKK.

Besides that, in order to achieve above-mentioned purposes and execute the business operations needed to carry out the activities of the group companies and in connection with the organizational changes occurring in the structure of the company such as division, merger, and acquisition, your personal data may be shared with the group companies of Emaar operating within the country (including specifically İstanbul Seyir Terası Otelcilik ve Turizm Yatırımları Ticaret A.Ş.) provided that you had granted your explicit consent as per article 8/1 of KVKK and with the group companies of Emaar operating at abroad including specifically Emaar Hospitality Group LLC and Emaar Properties PJSC provided that you had granted your explicit consent as per article 9/1 of KVKK.

Apart from the above, our company may be restructured while it changes and grows and may acquire new companies, our Companies may be transferred or all or substantial part of its assets may be transferred in part or in whole including net assets, it may merge with new companies or divisions may occur inside our Company. As a result of these structural changes, assets of our Company including personal data together with the personal data of our customers may be transferred. In case of such changes, you will be informed via e-mail, mail or public announcements about controlling your own personal data as per article 10 of KVKK and your explicit consent will be obtained when it is necessary.

Methods Used by us to Collect your Personal Data

Your personal data will be collected and processed by Emaar under the Legislation through the printed forms used in the organizations/fairs/stands etc. or electronic forms used in advertising campaigns in connection with the real properties included in Emaar's portfolio, including data collected via e-mails, online communication systems, customer relations management systems (CRM, SAP etc.) or with other automatic methods or by obtaining the same from the suppliers with whom Emaar has contractual relations provided that it is not contrary to the Legislation.

What are your Rights under KVKK as Data Owner?

In connection with your personal data processed by our Company, you will be entitled to apply to our Company in order to (i) learn whether your personal data has been processed, (ii) if processed, demand information about it, (iii) learn the purpose of processing and whether your personal data has been used in line with that purpose, (iv) learn the identity of the 3rd persons to whom personal data are transferred in and out of the country, (v) request correction of any personal data that had been processed deficiently/inaccurately, (vi) request deletion/destruction of your personal data under the conditions set forth in article 7 of KVKK, (vii) request that procedures mentioned in clauses (v) and (vi) are informed to the 3rd persons to whom your personal data was transferred, (viii) raise an objection to any negative results arising from analysis of your personal data exclusively by automated means, and (ix) claim recovery for your losses suffered after illegal processing of your personal data.

Concerning above mentioned rights, you may send an electronic mail to the address kvkk@emaar.com.tr or you may fill in **Emaar Turkey KVKK Application Form** available at our address www.emaarsquaremall.com and then send the printout of this form to the application address Ünalán Mahallesi Libadiye Caddesi No:82F, K:1, Üsküdar/Istanbul by writing on the envelope "Information Request under Personal Data Protection Law". Depending on the nature of your request, your request will be finalized on free of charge basis as soon as possible or at latest within 30 (thirty) days. However, if the procedure to be completed according to your requests requires extra costs, you may be charged a fee according to the tariff to be determined by the Personal Data Protection Board.

TEXT OF EXPLICIT CONSENT

- ☐ I have read and understood Emaar Square Mall Clarification Text for Protection of Personal Data. In that regard, I hereby grant with my free will my explicit consent to the processing of my personal data mentioned in the Clarification Text for the purposes set forth in the Clarification Text and to the sharing of the same with Emaar Group Companies, affiliates, suppliers and business partners operating in and out of the country and to their transfer to abroad on that basis.
- ☐ I also grant my explicit consent to any contact to be made with me through the communication channels defined below in order to provide and offer various advantages, information and announcements and for the purpose of introductions, promotions, advertising, sales, marketing, surveying and similar purposes and sending commercial electronic mails.
- ☐ E-Mail
- ☐ SMS
- ☐ Phone