

**NUROL REAL ESTATE INVESTMENT TRUST
PERSONAL DATA PROTECTION
AND PROCESSING POLICY**

This Policy shall not be copied and used without Nurool Investment Trust's written permission.

1. SECTION 1- INTRODUCTION

1.1. INTRODUCTION

Protection of personal data is among the most significant priorities of NuroI Investment Trust (“**Company**”); and our Company shows maximum effort to act in compliance with all the legislation in force in this regard. This NuroI Investment Trust Personal Data Protection and Processing Policy (“**Policy**”) constitutes the most important pillar of the matter.

This Policy sets out the principles adopted in the conduct of personal data processing activities performed by our Company and the fundamental principles adopted in respect of the compliance of our Company’s data processing activities with the provisions in the Personal Data Protection Law (“**Law**”); and thus, our Company ensures transparency by informing data subjects. Under the full awareness of our responsibility in this context, your personal data are processed and protected within the scope of this Policy.

1.2. SCOPE

This Policy relates to all the personal data of the individuals, other than our Company’s employees, which personal data are processed automatically, or non-automatically provided that they constitute a part of any data recording system.

Detailed information about these data subjects is accessible through the document of this Policy, namely the document entitled APPENDIX-1 (“**APPENDIX 1- Data Subjects**”).

The activities, carried out by our Company in relation to the protection of our employees’ personal data, are managed under the NuroI Holding A.S. Employees Personal Data Protection and Processing Policy prepared in parallel to the principles in this Policy.

2. SECTION 2 – ISSUES REGARDING PROCESSING OF PERSONAL DATA

2.1 Processing of personal data in compliance with the principles prescribed by the legislation

2.1.1. Lawfulness and compliance with the rule of objective good faith

Personal data are processed in compliance with the general confidence and the rule of objective good faith, without harming fundamental rights and freedoms of individuals. Within this framework, personal data are processed to the extent required by and limited to our Company’s business activities.

2.1.2. Ensuring that personal data are accurate, and up-to-date when needed

Throughout the period that personal data are processed, our Company takes measures necessary to ensure that personal data are accurate and up-to-date, and establishes necessary mechanisms in order to ensure accuracy and up-to-dateness of personal data for certain periods of time.

2.1.3. Processing for certain, clear and legitimate purposes

Our Company clearly sets forth the personal data processing purposes. In line with its business activities, our Company processes personal data within the scope of the aims that are in connection with these activities.

2.1.4. Compliance with the principle of proportionality, and being limited to and in connection with the processing purposes

Our Company collects personal data only to the extent and depending on the nature required by its business activities, and processes personal data limited to the purposes determined.

2.1.5. Retention until expiration of the period stipulated by the relevant legislation or necessary for the processing purposes

Our Company retains personal data until expiration of the period necessary for the processing purposes and until expiration of the minimum period stipulated by the relevant legislation. In this context, our Company firstly determines whether or not the relevant legislation stipulates a period for retention of personal data; and if such a period is stipulated, our Company acts in compliance with this period. Otherwise, personal data are retained until expiration of the period necessary for the processing purposes. At the expiration of the retention periods stipulated, personal data are destroyed in compliance with the periodic destruction periods or the data subject's application and through the destruction methods (erasure and/or destruction and/or anonymization) as determined.

2.2 CONDITIONS FOR PROCESSING OF PERSONAL DATA

Grant of explicit consent by the data subject is only one of the legal bases making it possible to process personal data lawfully; and in case one of the following conditions takes place, personal data are processed by our Company without the requirement of data subject's explicit consent.

Apart from explicit consent, the legal basis of a personal data processing activity can be one or more than one of the following conditions. In case the processed data are special categories of personal data, the conditions stipulated by the Section 2.3 of this Policy (entitled "***Processing of Special Categories of Personal Data***") shall apply.

2.2.1 Express permission by the laws

In case the laws expressly permit processing of data subjects' personal data, in other words, in case the relevant laws contain a provision expressly allowing processing of personal data, data subjects' personal data may be processed by our Company within the framework prescribed in the legislation.

2.2.2 Incapability of giving explicit consent due to de facto impossibility

A data subject's personal data may be processed in case it is mandatory to process his/her personal data in order to protect his/her or another individual's life or physical integrity where his/her consent is not deemed legally valid or he/she is incapable of giving explicit consent because of de facto impossibility.

2.2.3 Direct relation to conclusion or performance of a contract

This condition can be deemed to have taken place in case it is necessary to process personal data, provided that this is directly related to the conclusion or performance of the contract to which the data subject is a party.

2.2.4 Fulfilment of its legal obligation by the Company

A data subject's personal data may be processed in case the data processing is mandatory for our Company to fulfill its legal obligations.

2.2.5 Making of his/her personal data public by data subject

In case a data subject has made his/her personal data public, those personal data may be processed limited to the purposes of making public.

2.2.6 Data processing necessity for the establishment or protection of a right

A data subject's personal data may be processed in case the data processing is necessary for the establishment, exercise or protection of a right.

2.2.7 Data processing necessity for our Company's legitimate interest

A data subject's personal data may be processed in case the data processing is necessary for our Company's legitimate interests, provided that the fundamental rights and freedoms of the data subject are not harmed.

2.3 Processing of special categories of personal data

Under the Law, particular importance is given to the sensitive personal data by the reason that they may cause the risk of victimization or discrimination when they are processed unlawfully. Data related to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other belief, appearance and dressing, membership of association, foundation or trade union, data related to health and sexual life, criminal conviction and security measures, and biometric and genetic data are the "special categories of personal data".

Our Company processes special categories of personal data in compliance with the principles specified in this Policy and by taking all kinds of administrative and technical measures, including the methods to be determined by the Personal Data Protection Committee ("**Committee**"), and in case the following conditions take place:

- (i) **Special categories of personal data other than health and sexual life** may be processed without the requirement of data subject's explicit consent in case the relevant law expressly permits processing of personal data, in other words, in case the law contains a provision expressly allowing processing of personal data. Otherwise, the data subject's explicit consent shall be obtained.
- (ii) **Special categories of personal data related to health and sexual life** may, without the requirement of explicit consent, be processed by competent institutions and organizations or persons who are under the confidentiality obligation, for the purposes of protecting the public health, conducting preventive medicine, medical diagnosis, treatment and nursing services and for the planning and management of healthcare services and their financing. Otherwise, the data subject's explicit consent shall be obtained.

2.4 Processed personal data categories and processing purposes

The categories of personal data processed by our Company within the framework of the conditions and purposes -specified in this Policy- in accordance with the Law and the provisions of the other relevant legislation and detailed information about these categories are accessible through the document of this Policy, namely the document entitled APPENDIX-2 ("**APPENDIX-2 Personal Data Categories**").

The following are the personal data processing purposes of our Company within the scope of the personal data and special categories of personal data processing conditions detailed in this Policy in accordance with the Law and the other relevant legislation:

1. Planning and/or execution of our Company's human resources policies and processes;
2. Planning and/or execution of the activities to ensure legal and technical security of our Company and of the relevant persons that are in business relationship with our Company;
3. Planning and/or execution of the activities necessary for the suggestion and advertising, to the relevant persons, of the products and services offered by our Company or and/or for and on behalf of our Company, by customization according to the admiration, usage habits and needs of the relevant persons;
4. Performance of the necessary works and studies in order that the relevant persons make use of or benefit from the products and/or services offered by our Company and/or for and on behalf of our Company, and conduct of the relevant business processes;
5. Performance of the necessary works and studies by our relevant business units for the realization of the commercial and/or operational activities being carried out by our Company, and conduct of the appurtenant business processes;
6. Planning and/or execution of our Company's commercial and/or business strategies.

Detailed information about these personal data processing purposes is accessible through the document of this Policy, namely the document entitled APPENDIX-3 (***APPENDIX 3- Personal Data Processing Purposes***).

3. SECTION 3 – MATTERS REGARDING TRANSFER OF PERSONAL DATA

Our Company may transfer data subjects' personal data and special categories of personal data to third parties by taking necessary security measures in line with the lawful personal data processing purposes. Accordingly, our Company acts in compliance with the provisions prescribed by articles 8 and 9 of the Law. Detailed information of this matter is accessible through the document of this Policy, namely the document entitled APPENDIX-4 (***APPENDIX 4- Third Parties that Our Company Transfers Personal Data, and Transfer Purposes***).

3.1 Transfer of personal data

In case one or more than one of the following conditions take place even if the data subject does not grant the explicit consent, our Company may transfer the personal data to third parties by exercising due diligence and by taking all necessary security measures, including the methods stipulated by the Committee:

- The laws expressly allow the relevant activities for transfer of personal data;
- Transfer of personal data by the Company is directly related to and necessary for conclusion or performance of a contract;
- Transfer of personal data is mandatory for our Company to fulfill its legal obligations;
- Transfer of personal data by our Company in such a way limited to the purposes of making public, provided that the personal data have been made public by the data subject;
- Transfer of personal data by the Company is mandatory for the establishment, exercise or protection of the Company's or the data subject's or third parties' rights;
- Necessity to perform personal data transfer activities for the Company's legitimate interests, provided that the fundamental rights and freedoms of the data subject are not harmed;

- Necessity to transfer personal data in order to protect the life or physical integrity of a data subject or another person as the data subject is incapable to give his/her explicit consent because of de facto impossibility or his/her consent is not deemed legal valid.

In addition to the above conditions; in cases where personal data will be transferred abroad, our Company will transfer personal data to the foreign countries as announced by the Committee that they provide adequate protection ("**Foreign Country Providing Adequate Protection**"), or in the absence of such adequate protection, to such foreign countries which are permitted by the Committee and whose data controllers in Turkey and in the relevant foreign country make the written commitment for the provision of adequate protection ("**Foreign Country Where The Data Controller Making The Commitment For Adequate Protection Is Located**").

3.2 Transfer of special categories of personal data

Our Company may transfer special categories of personal data in compliance with the principles specified in this Policy and by taking all kinds of administrative and technical measures, including the methods to be determined by the Committee, and in case the following conditions take place:

- (i) **Special categories of personal data other than health and sexual life** may be processed without the requirement of data subject's explicit consent in case the relevant law expressly permits processing of personal data, in other words, in case the law contains a provision expressly allowing processing of personal data. Otherwise, the data subject's explicit consent shall be obtained.
- (ii) **Special categories of personal data related to health and sexual life** may, without the requirement of explicit consent, be processed by competent institutions and organizations or persons who are under the confidentiality obligation, for the purposes of protecting the public health, conducting preventive medicine, medical diagnosis, treatment and nursing services and for the planning and management of healthcare services and their financing. Otherwise, the data subject's explicit consent shall be obtained.

In addition to the above conditions; in cases where personal data will be transferred abroad, our Company will transfer personal data to the "Foreign Countries Providing Adequate Protection" or "Foreign Countries Where The Data Controller Making The Commitment For Adequate Protection Is Located".

4. SECTION 4 – INFORMING THE DATA SUBJECT

In compliance with article 10 of the Law and the secondary legislation, our Company informs the data subjects about the identity of the data controller, the purposes for which their personal data are processed, the purposes for which and the identities of the persons or entities with whom their personal data are shared, through which methods their personal data are collected and about the relevant legal cause as well as the data subjects' rights they hold within the scope of processing of their personal data.

5. SECTION 5- RETENTION AND DESTRUCTION OF PERSONAL DATA

Our Company retains personal data until expiration of the period necessary for the processing purposes and until expiration of the minimum period stipulated by the relevant legislation. In this

context, our Company firstly determines whether or not the relevant legislation stipulates a period for retention of personal data; and if such a period is stipulated, our Company acts in compliance with this period. Otherwise, personal data are retained until expiration of the period necessary for the processing purposes. At the expiration of the retention periods stipulated, personal data are destroyed in compliance with the periodic destruction periods or the data subject's application and through the destruction methods (erasure and/or destruction and/or anonymization) as determined.

6. SECTION 6- ISSUES REGARDING PROTECTION OF PERSONAL DATA

In compliance with article 12 of the Law, our Company takes measures necessary depending on the characteristics of the data to be protected, in order to prevent unlawful disclosure of, access to and transfer of personal data or in order to prevent any security lacks that might occur in other ways. In this context, in compliance with the guides published by the Committee, our Company takes administrative measures, carries out inspections or has such inspections carried out, in order to ensure the necessary security level.

Within this scope, the technical and administrative measures taken for the protection of personal data are implemented meticulously by our Company with regard to the special categories of personal data, and necessary inspections are provided within the body of our Company.

6.1 Raising awareness of business units on the protection and processing of personal data, and their supervision

Our Company ensures organization of necessary trainings for business units in order to raise awareness intended for ensuring prevention of unlawfully processing of personal data, unlawful access to personal data and for ensuring retention of the data.

Our Company sets up systems necessary for occurrence of the awareness for protection of personal data on the part of its current employees as well as the employees who newly started to work within the body of our Company. If needed in respect of the matter, our Company works with consultants. Accordingly, our Company assesses the participations in the relevant trainings, seminars and information sessions, and organizes new trainings in parallel to the recent changes in the legislation.

7. SECTION 7 – RIGHTS OF DATA SUBJECTS AND EXERCISE OF THESE RIGHTS

7.1 RIGHTS OF DATA SUBJECT

Data subjects have the following rights:

- 1)** To learn whether or not their personal data are processed;
- 2)** To request for relevant information, if their personal data have been processed;
- 3)** To learn the purposes for the processing of their personal data and whether or not those data are used in compliance with the purposes;
- 4)** To know the third parties in the Country or abroad, to whom their personal data are transferred;
- 5)** To request for rectification in case their personal data have been processed incompletely or inaccurately; and to request that the operations carried out in this context be notified to the third parties to whom their personal data are transferred;
- 6)** To request for erasure or destruction of their personal data in case the reasons necessitating their processing cease to exist, despite they have been processed in compliance with the

provisions of the Law and other related laws; and to request that the operations carried out in this context be notified to the third parties to whom their personal data are transferred;

- 7) To object to occurrence of any results that are to their detriment through analysis of their processed data exclusively by automated systems;
- 8) To request for compensation of the damages in case they incur damages due to the unlawfully processing of their personal data.

7.2 EXERCISE OF HIS/HER RIGHTS BY DATA SUBJECT

Data subjects may transmit to our Company their requests related to their rights listed in the Section 7.1. (***“Rights of Data Subject”***), through the methods determined by the Committee. Accordingly, they may use “the Data Subject Application Form” accessible at www.nurolgyo.com.tr.

7.3 RESPONSE OF OUR COMPANY TO APPLICATIONS

Our Company takes the necessary administrative and technical measures in order to conclude the applications of data subjects in compliance with the Law and the secondary legislation.

In case the data subject transmits duly to our Company his/her request related to the rights contained in the Section 7.1. (***“Rights of Data Subject”***), our Company shall conclude the relevant request free of charge as soon as possible depending on the nature of the request or in no later than thirty (30) days. However, in case the relevant transaction additionally requires a cost, the fee may be collected as indicated in the tariff determined by the Committee.

APPENDIX-1 DATA SUBJECTS

DATA SUBJECT CATEGORY	DEFINITION
Employee Candidate / Intern Candidate	: Real person who has, in any way, applied to our Company for a job or made his/her CV and related information available for our Company's review.
Former Employee	: Real person whose employment contract with our Company terminated for any reason (resignation, dismissal, retirement etc.)
Customer	: Real persons who are employees, officials or shareholders of the legal persons or real persons that use or have used the products and services offered by our Company or that have applied in order to use the products and services offered by our Company or whose applications are in the evaluation phase.
Potential Customer	: Real persons who are employees, officials or shareholders of the legal persons or real persons that do not demand for or are not interested in the use of our products and services, however, are considered to be possibly interested in such use, in accordance with the business practices or the rule of objective good faith.
Event Participant	: Real person who participates in the events, organizations and similar activities organized by our Company.
Persons Who Submit Opinions/Complaints/ Suggestions or Request for Information	: Real persons who transmit their opinions/complaints/suggestions or their requests for information or other requests to our Company, regardless of whether they have made use of our Company's products and services.
Visitor	: Real person who visits or have visited our Company's premises or websites or who connect or have connected to our Company's guest internet network.
Campaign / Contest Participant	: Real person who participates or have participated in the campaigns or contests organized by our Company.
Data Subject's Relatives	: Persons who are relatives or family members of our employees and/or of the persons that make use of our Company's products and/or services.
Supplier's Employee/ Official / Shareholder	: Real persons who are shareholders, officials or employees of the companies that provide goods and/or services to our Company on the basis of the contracts which are effective and/or possibly to be concluded between our Company or those companies in the future.
Business Partner's Employee/ Official/ Shareholder	: Real persons who are shareholders, officials or employees of the companies with which our Company establishes a business partnership for the purposes such as sales, advertising and marketing of and/or after-sales support for our Company's products and services and/or the conduct of joint customer loyalty programs.
Other Third Parties	: Real persons and other third parties that are included in the scope of this Policy, however, are not included in the scope of the Nurol Real Estate Investment Trust Employees Personal Data Protection and Processing Policy.

APPENDIX-2 PERSONAL DATA CATEGORIES

PERSONAL DATA CATEGORIES	DEFINITION
Identity Information	: Data containing information about persons' identities (e.g. Driving licenses, identity cards or passports containing name and surname, T.R. identity number, nationality information, mother's name and surname, father's name and surname, date and place of birth, gender, photograph; and information such as tax identification number etc.)
Contact Information	: Telephone number, address, e-mail address, IP address and similar contact or communication information.
Financial Information	: Personal data, processed in relation to the information, documents and records indicating any financial results created depending on the types of legal relationships established by our Company with data subjects and information such as bank account number, IBAN number, credit card information, financial profile, asset data and income information etc.
Process Security Information	: Data processed in order that we ensure our technical, administrative, legal and commercial security while we carry out our commercial activities (Log records, passwords and passphrases etc.).
Legal Transaction and Compliance Information	: Personal data, processed within the scope of determining and following-up of our legal receivables and rights, discharge of our debts and compliance with our legal obligations and our Company's policies.
Request/Complaint Management Information	: Personal data related to the receipt and evaluation of all kinds of requests or complaints addressing to our Company.
Visual and Auditory Data	: Data that are of visual or auditory nature, such as photographs, camera/voice recordings.
Physical Location Security Information	: Personal data contained in the documents and records received in entering the Company's physical locations and while being in the physical locations: Camera recordings, visitor records etc.
Audit and Inspection Information	: Personal data, processed in the course of internal or external auditing or inspection activities within the scope of our Company's compliance with its legal obligations and the Company policies.
Employee Candidate / Intern Candidate Information	: Personal data such as the CVs, interview notes pertaining to the intern candidates and/or employee candidates who have, in any way, applied to our Company for a job.
Vehicle Information	: Data pertaining to the vehicles associated with data subjects, e.g. license plate number.
Location Data	: Data detecting current location of our employees and the employees of the entities with which our Company is in cooperation, while they are using or driving our Company's vehicles, such as GPS location, travelling data.
Family Members' and Relatives' Information	: Personal data about data subjects' family members and relatives (spouse, mother, father, child) and about other persons whom may be contacted in

		urgent cases, in order to protect the Company's and the data subject's legal and other interests within the framework of the operations carried out by our Company's business units.
Special Categories of Personal Data	:	Data referred to in article 6 of the Law (medical/health data, biometric data, religion, associations of which the data subject is a member etc.)
Customer Information	:	Data obtained in relation to our customers that make use of our real estate investment services during realization of our commercial activities.
Customer Transaction Information	:	Records for use of our products and services, and information such as the customer's instructions and requests necessary for the customer's use of the products and services.
Marketing Information	:	Personal data, processed for marketing of our products and services by customization in line with the data subjects' usage habits, admirations and needs; and the assessments and reports created in the wake of those processing results.

APPENDIX-3 PERSONAL DATA PROCESSING PURPOSES

MAIN PURPOSES (PRIMARY)	SUB-PURPOSES (SECONDARY)
<p>Planning and/or execution of our Company’s human resources policies and processes</p>	<p>Planning and/or execution of the employee’s performance/talent assessment processes</p>
	<p>Planning and/or execution of employee candidates’ application, election and assessment processes</p>
	<p>Following-up and/or inspection of the employees’ business operations</p>
	<p>Planning and/or execution of the fringe benefits and/or social benefits for the employees</p>
	<p>Planning and/or execution of the processes for the commencement of the employment and/or for employee benefits, rights and personal matters pertaining to the employees</p>
	<p>Planning and/or execution of the operational activities related to and necessary for the disciplinary/ethics processes</p>
<p>Planning and execution of the activities to ensure the legal and technical security of our Company and of the relevant persons that are in a business relationship with our Company</p>	<p>Planning and/or execution of the operational activities necessary for the conduct of the Company’s activities in compliance with the Company procedures and/or the relevant legislation</p>
	<p>Planning and/or execution of the realization of the transactions related to the law of companies and corporations</p>
	<p>Planning and/or execution of the activities necessary for the compliance with the security policies and procedures</p>
	<p>Monitoring and following-up of legal affairs</p>
	<p>Planning and/or execution of the activities to provide and record the requests and the information or documents requested from public institutions and/or organizations</p>
	<p>Ensuring that the data are accurate and/or up-to-date</p>
	<p>Planning and/or execution of the activities for fighting against laundering of crime revenues, financing of terrorism, planning and/or execution of know your customer (KYC) activities and the activities for identification of similar legal and commercial risks</p>
	<p>Ensuring the security of the Company’s operations Planning, inspection and/or execution of the</p>

	information security processes
	Establishment and/or management of information technologies infrastructure
	Planning and/or execution of internal/external audit, inspection, investigation and/or control activities pertaining to our Company
	Monitoring and/or following-up of contract processes and/or legal demands
	Ensuring security of the Company's fixtures and/or resources
	Ensuring security of the Company's premises and/or facilities
	Creation and/or monitoring and/or following-up of visitor records
<p>Planning and/or execution of the activities necessary for the suggestion and advertising, to the relevant persons, of the products and services offered by our Company or and/or for and on behalf of our Company, by customization according to the admiration, usage habits and needs of the relevant persons</p>	Planning and/or execution of campaign and/or promotional and/or advertising processes
	In line with the customer behavior criteria, identification of and/or assessments on the persons to be associated with marketing activities
	Designing and/or execution of customized marketing and/or advertising activities (data enrichment, profiling, segmentation and similar)
	Designing and/or execution of advertising and/or promotional and/or marketing activities in digital and/or other media
	Designing and/or execution of activities to be developed on value creation before the current customers and/or gaining customers in digital and/or other media
	Planning and/or execution of data analytical studies for marketing purposes
	Planning and/or execution of campaign performance measurement and reporting activities
	Planning and/or execution of marketing processes of products and/or services
<p>Performance of the necessary works and studies in order that the relevant persons make use of or benefit from the products and/or services offered by our Company and/or for and on behalf of our Company, and conduct of the relevant business processes</p>	Planning and/or execution of the operations related to the survey activities performed by our Company
	Creation and/or monitoring and/or following-up of the application and/or sales processes for products and/or services
	Planning and/or execution of customer relationship management processes
	Planning and/or execution of activities for customer satisfaction and/or experience
	Assessing of customer requests and/or complaints collected in digital and/or other media
	Planning and/or execution of the activities related to returns/renewal/replacement/repair of

	products
	Planning and/or execution of the activities for taking security measures related to products and services
Performance of the necessary works and studies by our relevant business units for the realization of the commercial and/or operational activities being carried out by our Company, and conduct of the appurtenant business processes	Monitoring and/or following-up of finance and/or accounting procedures
	Planning and/or execution of corporate management activities
	Planning and/or execution of activities to ensure business continuity
	Planning and/or execution of procurement processes
	Planning and execution of corporate communication operations
	Planning and/or execution of operational and/or efficiency and/or productivity processes
	Defining and/or inspection of the authorization to access information, granted or to be granted to our employees and to persons outside the Company
	Planning and/or execution of internal/external reporting activities
Planning and/or execution of our Company's commercial and/or business strategies	Management of the relationships that take place or have taken place with business partners and/or suppliers
	Planning and/or execution of the Company's financial risk processes
	Planning and execution of feasibility studies and/or risk assessment activities for selection of potential business partners/suppliers/subcontractors

APPENDIX- 4 THIRD PARTIES THAT OUR COMPANY TRANSFERS PERSONAL DATA, AND TRANSFER PURPOSES

Persons to Whom Personal Data may be Transferred	Definition	Data Transfer Purpose
Suppliers	These are the parties providing services to our Company in line with our Company's data processing purposes and instructions within the scope of conducting its commercial activities.	Personal data are transferred limited to the purpose of ensuring the provision of the services to our Company, which services are supplied from the supplier by our Company and are necessary for our Company to perform its commercial activities.
Business Partners	These are the parties with which our Company is cooperation for the purposes such as sales, advertising and marketing of and/or after-sales support for our Company's products and services and/or the conduct of joint customer loyalty programs, while our Company is carrying out its commercial activities.	Personal data are transferred limited to the purpose of ensuring fulfillment of the objectives for creation of business partnership.
Group Companies	These are the group companies that are directly or indirectly affiliated with Nurol Holding A.S. -Information about the group companies affiliated with Nurol Holding A.S. is accessible at www.nurol.com.tr .	In line with the employee candidate's consent and within the scope of realization of assessments on employee candidates, personal data are transferred to the group companies directly or indirectly affiliated with Nurol Holding Anonim Sirketi.
Shareholders	These are the real or legal person shareholders authorized in respect of designing inspection activities and strategies related to commercial activities of our Company as per the provisions of the relevant legislation.	Personal data are transferred limited to the purposes of designing inspection activities and strategies related to commercial activities of our Company as per the provisions of the relevant legislation.
Legally Authorized Public	These are the public institutions and	Personal data are transferred

Institutions and Organizations	organizations authorized to receive information and documents from our Company as per the provisions of the relevant legislation.	limited to the purpose as requested by the relevant public institutions and organizations within their legal authorization.
Legally Authorized Private Entities	These are the entities or organizations which were founded in compliance with the conditions determined by law under the provisions of the relevant legislation and continue performing their activities within the framework determined by law.	Personal data are transferred in respect of and limited to the matters included in the scope of the activities carried out by the relevant private entities and organizations.