**SARAR GİYİM TEKSTİL ENERJİ SANAYİ VE TİCARET A.Ş.**

**PRIVACY AND COOKIES POLICY**

**1- GENERAL EXPLANATION AND DEFINITIONS**

We, Sarar Giyim Tekstil Sanayi ve Ticaret A.Ş. and Sarar Büyük Mağazacılık Ticaret A.Ş. (hereinafter referred to as SARAR together and individually) with the capacity of "data controller", would like to share our privacy and cookie policy with you with this informative text.

**2- PERSONAL DATA TO BE PROCESSED**

The personal data to be processed by SARAR are listed below, and when required by law and/or in case of necessity, new information can be added to and/or changes may be made in such data.

**Personal data subject to data processing of the relevant person;**

* Name, Surname, TR Number, Date of Birth, etc. ID information,
* Address, telephone, fax, e-mail, etc. contact information,
* Tax Office and Tax Number information,
* Information about profession and education,

**3-** **METHODS OF COLLECTION OF PERSONAL DATA**

While personal data can be obtained directly from the person concerned, they can also be obtained indirectly including but not limited to online sales platforms, dealers, solution partner institutions and organizations according to the purpose of obtaining the acquired data.

**4- PURPOSE OF PROCESSING PERSONAL DATA**

SARAR processes personal data for the following purposes. These purposes are;

* Fulfillment of obligations regarding tax, etc. public receivables within the scope of tax laws, Turkish Commercial Code No. 6102 and other legal regulations,
* Taking measures regarding the protection of consumer rights within the scope of the Consumer Protection Law No. 6502,
* Receiving of orders for the products that the relevant persons want to purchase from SARAR, selling of the products, delivering of the products to the relevant persons, collection of their prices, providing of after-sales services regarding the sold product, measuring of customer satisfaction, collecting and evaluating of complaints and suggestions, if any, regarding the product or service sold,
* Arranging distance sales contracts for purchases made through electronic commerce platforms,
* verifying the identity of the person concerned,
* Increasing service quality,
* Carrying out campaigns, promotions, advertisements and promotional activities regarding products and services, providing information on these issues,
* Enabling Sarar Card holders to earn special points or discounts for their purchases within the scope of the Sarar Loyalty Program,

**5- TRANSFER AND PROTECTION OF PERSONAL DATA**

SARAR does not transfer the personal data it has obtained for data processing purposes to third parties/institutions without the explicit consent of the person concerned. Your personal data is collected using Secure Sockets Layer (SSL), which is generally approved and accepted on SARAR websites, and is shared over the same secure environment based on your permission. Strong passwords are required for user accounts created on websites. There are various security considerations in the cloud server network layer where the websites are served.

SARAR may transfer the personal data to the persons, institutions and/or organizations required/permitted by tax and social security laws and other laws and other legislation including but not limited to public legal entities authorized to receive personal data such as the Revenue Administration, Turkish Employment Agency, Social Security Institution, Financial Crimes Investigation Board, Interbank Card Center, Credit Registration Bureau, domestic/foreign subsidiaries of SARAR, companies that operate as a dealership, cooperating program partner/solution partner institutions and organizations, PTT branches, companies from which logistic support services, consultancy and independent audit services are obtained due to legal obligations; and to 3rd persons and institutions, even if there is no legal obligation, in order to achieve its aims to provide better service within the scope of Article 6 provided that the rights of the person concerned within the scope of Law No. 6698 are reserved.

**6- OBTAINING EXPRESS CONSENT OF THE RELATED PERSON IN PROCESSING PERSONAL DATA**

Personal data to be processed by SARAR is processed by obtaining the "explicit consent" of the person concerned within the scope of the Law No. 6698. Explicit consent refers to the consent of the person concerned about a particular subject, based on information and freely expressed.

Pursuant to Article 5/2 of the Law No. 6698, personal data may be processed without seeking the explicit consent of the person concerned, in case one of the following conditions exists.

* It is expressly provided for by the laws,
* It is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid,
* Processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract,
* It is necessary for compliance with a legal obligation to which the data controller is subject.
* Personal data have been made public by the data subject himself/herself,
* Data processing is necessary for the establishment, exercise or protection of any right,
* Processing of data is necessary for the legitimate interests pursued by the datacontroller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

**7- RETENTION PERIOD OF PERSONAL DATA**

SARAR destroys the personal data (deletes, destroys or anonymizes personal data) when the purpose of processing personal data ceases to exist and the mandatory storage periods determined under the Laws and other legislation expire.

**8- RIGHTS OF DATA SUBJECTS**

Personal data subjects have the following rights by applying to the data controller;

* to learn whether his/her personal data are processed or not,
* to demand for information as to if his/her personal data have been processed,
* to learn the purpose of the processing of his/her personal data and whether these personal data are used in compliance with the purpose,
* to know the third parties to whom his personal data are transferred in country or abroad,
* to request the rectification of the incomplete or inaccurate data, if any,
* to request the erasure or destruction of his/her personal data under the conditions referred to in the law,
* Requesting notification of changes regarding correction, deletion or destruction of personal data to third parties to whom personal data has been transferred,
* to object to the occurrence of a result against the person himself/herself by analyzing the data processed solely through automated systems,
* to claim compensation for the damage arising from the unlawful processing of his/her personal data

**9- APPLICATION TO DATA CONTROLLER**

Natural persons whose personal data are processed may apply to SARAR regarding their requests within the scope of their rights specified in Article 11 of the Law No. 6698. Relevant persons may benefit from this right, provided that they submit their applications in Turkish. Relevant persons may submit their requests to SARAR through one of the following communication channels. In this direction, the relevant persons may submit their requests to SARAR through the following methods;

* in writing,
* via registered e-mail (KEP) address,
* with secure electronic signature or mobile signature,
* by using the e-mail address previously notified to SARAR by the person whose personal data is processed and registered in SARAR's system,
* by means of a software or application developed for the purpose of application

Applications must include the following;

* Name, surname and signature if the application is written,
* For citizens of the Republic of Turkey, T.C. identification number, nationality for foreigners, passport number or identification number, if any,
* Domicile or workplace address for notification,
* If available, the e-mail address, telephone and fax number for notification,
* Subject of request.

Information and documents related to the subject should be attached to the application. Application requests can be made using the "Application Request Form". For the applications to be made by the relevant persons, the communication channels specified in the section titled "2-INFORMATION REGARDING THE DATA CONTROLLER" of this information text can be used.

SARAR concludes the requests in the application free of charge as soon as possible and within thirty days at the latest, depending on the nature of the request. However, if the transaction requires a separate fee, a fee may be charged in the amount specified in Article 7 of the "Communiqué on the Procedures and Principles of Application to the Data Controller". In case the application is caused by the fault of the data controller, the fee collected shall be returned to the relevant person.

**10- CHANGES AND UPDATES**

This text has been prepared within the scope of the Law No. 6698 and the Regulations and Communiqués published within the scope of the said Law and the personal data processing purposes and policies of SARAR. Necessary changes can be made in this text and in our informative text in line with the changes that will occur in the relevant legal legislation and/or SARAR's personal data processing purposes and policies.

The most up-to-date version of the Information Text can be accessed at https://group.sarar.com/kisisel-verilerin-korunmasina-iliskin-aydinlatma-metni/

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| **Sarar Giyim Tekstil Sanayi ve Ticaret A.Ş.** | |
| Central Civil Registration System Number | 0745002769100135 |
| Address | Organize Sanayi Bölgesi Mümtaz Zeytinoğlu Bulvarı No:13 Odunpazarı – ESKİŞEHİR |
| Phone | +90 222 236 04 00 |
| Fax | +90 222 236 04 05 |
| e-mail address | kvkk@sarar.com |

**COOKIES POLICY**

The data provided by our customers who make transactions on www.sarar.com and shop.sarar.com websites are processed by SARAR in accordance with our consent of the customers and legislation provisions within the scope of our privacy policy.

1. What methods does Sarar use to collect personal data?

The websites www.sarar.com and shop.sarar.com owned by SARAR are a site that uses cookies. A cookie is a file consisting mostly of letters and numbers, which allows the device to be detected by being stored in the internet browser or hard disk of the device being used.

www.sarar.com and shop.sarar.com will collect, process, share with third parties and securely store your browsing information, in order to provide better service to its visitors and within the framework of its legal obligations, provided that it remains within the purposes and scope specified in the Privacy Policy and the informative text.

www.sarar.com and shop.sarar.com store information collected through cookies, log files, blank gif files and/or third party sources to create a summary of your preferences. www.sarar.com and shop.sarar.com can monitor your browsing information and/or your usage history on the site, subject to your marketing permit, in order to make special promotions for you, to offer promotions and marketing offers, to improve the content of the website for you and/or to determine your preferences.

www.sarar.com and shop.sarar.com may match information collected from you on the site at different times or in different ways, such as information collected online and offline, and use this information together with information from other sources such as third parties.

You can remove persistent cookies and reject both session cookies and persistent cookies by following the instructions given in the "help" file of your internet browser or by visiting "www.allaboutcookies.org" or "www.youronlinechoices.eu". If you refuse persistent or session cookies, you can continue to use the website, but you may not be able to access all functions of the website or your access may be limited.

1. **How Are Website Cookies Used?**

www.sarar.com and shop.sarar.com use cookies to remember your preferences and personalize your use of the website. This usage includes cookies that save your password and keep your website session open, saving you the hassle of entering your password more than once during each visit, and cookies that remember and recognize you on subsequent visits to the website.

This is used to determine how you use the website, including tracking how you use the website, such as where you connect to the www.sarar.com and shop.sarar.com website, what content you view on the website, and the duration of your visit.

Cookies on the www.sarar.com and shop.sarar.com websites are used for advertising/promotional purposes to provide you with more relevant content and advertisements for your interests. In this way, when you use the website, it offers you more suitable content, personalized campaigns and products and does not offer you the content or opportunities that you previously stated that you do not want.

1. **How does the website use third-party cookies for advertising and retargeting?**

www.sarar.com and shop.sarar.com website cookies may also use search engines to activate "advertising technology" in order to present you with advertisements that it thinks may be of interest to you when you visit the website and/or websites where the website advertises. Advertising technology uses information about your previous visits to the website and the websites on which the website advertises, in order to serve you tailored advertisements. When serving these ads, a unique third-party cookie may be placed in your browser so that the website can recognize you. You can remove persistent cookies and reject both session cookies and persistent cookies by following the instructions given in the "help" file of your internet browser or by visiting "www.allaboutcookies.org" or "www.youronlinechoices.eu".

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| MAGENTO | Official documentation on the encryption algorithm | <https://docs.magento.com/m2/ce/user_guide/system/encryption-key.html> |
| You can also access general security issues from this link | <https://docs.magento.com/m2/ce/user_guide/stores/security.html> |