

## ZEREN GROUP INVESTMENT HOLDING INC. CLARIFICATION TEXT ON WEB SITE COOKIES

*Last updated: 01 / 02 / 2020*

As Zeren Group Joint Stock Company (**referred to as "Zeren Group" or "Company"**), we utilize some technologies ("**cookies**") such as cookies, pixels, gifs to improve your experience during your visits to our online courses. The use of these technologies is carried out in accordance with the legislation we are subject to, in particular the Law on the Protection of Personal Data No. 6698 ("**KVKK**").

The purpose of this clarification text is to provide you information regarding the processing of personal data obtained during the use of cookies by Site users / members / visitors ("**Data Subject**") during the operation of the Zeren Group website ("**Site**") being operated by our side. In this Clarification Text, we would like to explain to you what kinds of cookies we use on our Site and how you may control these cookies.

As Zeren Group, we may cease using the cookies that we use on our Site, change their types or functions, or add new cookies to our Site. Therefore, we reserve the right to change the terms of this Clarification Text at any time. Any changes to be made on the current Clarification Text shall be effective as soon as they are published on the Site or in any public course. You may find the last update date at the beginning of this Clarification Text.

For more detailed information regarding the processing of your personal data by the Company, we recommend that you read the Zeren Group Yatırım Holding Anonim Şirketi Personal Data Protection and Processing Policy at the address of [Zeren Group Data Protection](#)

### **What Cookies Are Used for What**

#### **Purposes? Generally;**

As Zeren Group, we use cookies on our Site for various purposes and process your personal data through these cookies. These main objectives are listed below:

- **To perform the basic functions required for the site to work.** For example, the members who are logged in do not need to enter password again during their visit of different pages on the Site.

- **To Analyze the Site and increase the performance of the Site.** For example, the integration of different servers on which the Site operates, determining the number of visitors to the Site and making performance adjustments accordingly, or simplifying visitors to find what they are searching for.

- **To increase the functionality of the Site and to provide ease of use.** For example, sharing on third-party social media channels through the Site, remembering the username information or search queries during the next visit of the visitor to the Site.

- **To carry out personalization, targeting and advertising activities.** For example, showing ads related to visitors' interests on the pages and products viewed by visitors.

Your personal data may be processed in line with your consent in accordance with the provisions of articles 5 and 8 of the KVK Law and / or in case of exceptions in the relevant legislation, when it is required as per the legislation; otherwise they may be proceed without your consent to realize above mentioned objectives. As Zeren Group, we may share your personal data within the scope of the Clarification Text with third parties, suppliers, business partners and group companies, where our Company benefits from the services, limited to the achievement of the above-mentioned objectives and in accordance with the legislation. We would like to state that the parties the data is transferred to, may store your personal data on servers all over the world.

### **Cookies Used on Our Site**

Below you can find the different types of cookies we use on our Site. Our site both uses first party cookies (placed by the Site you visit) and third-party cookies (placed by servers other than the Site you visit).

### **Mandatory Cookies**

The use of certain cookies is mandatory for our Site to function properly. For example, the authentication cookies that are activated when you log on to our Site ensure that your active session continues during your transition from one page to another on our Site.

<b>Cookie</b>	<b>Explanation</b>
	A Microsoft SharePoint Cookie that applied internally to show whether a page is showing in full screen mode or not.

### **Functionality and Preference Cookies**

These cookies remember your preferences and choices on the Site and provide personalization of the services offered on our Site. For example, it allows us to remember your language selection on our Site or the font size you chose while reading a text.

### **Social Media Cookies**

These cookies provide to collect information about your social media usage. For example, cookies may be used to use information on your Facebook / Twitter accounts to create personalized ads or conduct market research.

Cookie	Explanation
	Used for improving the overall functioning site visit on the website and apps and collecting information about how you use them (viewed pages, average duration of visit, etc.)

### **Performance and Analysis Cookies**

By virtue of these cookies, we are able to analyze your use on our Site and performance of our Site to improve our services. For example, by means of these cookies, we may determine which pages our visitors view the most, whether our site is working properly or not and possible problems.

### **Targeting or Advertising Cookies**

We use cookies to promote products and services to you on our Site or in channels other than our Site. In addition, we may cooperate with some of our business partners to advertise on or off our Site. For example, cookies may be used to track whether you have clicked on an advertisement that you see on our Site or not, if you have benefited from the service on that site the ad directed you after you have attracted to the advertisement.

### **How Can I Control the Use of Cookies?**

You have the opportunity to personalize your preferences for cookies by changing the settings of your browser.

Adobe Analytics	<a href="http://www.adobe.com/uk/privacy/opt-out.html">http://www.adobe.com/uk/privacy/opt-out.html</a>
AOL	<a href="https://help.aol.com/articles/restore-security-settings-and-enable-cookie-settings-on-browser">https://help.aol.com/articles/restore-security-settings-and-enable-cookie-settings-on-browser</a>
Google Adwords	<a href="https://support.google.com/ads/answer/2662922?hl=en">https://support.google.com/ads/answer/2662922?hl=en</a>
Google Analytics	<a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>
Google Chrome	<a href="http://www.google.com/support/chrome/bin/answer.py?hl=en&amp;answer=95647">http://www.google.com/support/chrome/bin/answer.py?hl=en&amp;answer=95647</a>
Internet Explorer	<a href="https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies">https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies</a>
MozillaFirefox	<a href="http://support.mozilla.com/en-US/kb/Cookies">http://support.mozilla.com/en-US/kb/Cookies</a>
Opera	<a href="http://www.opera.com/browser/tutorials/security/privacy/">http://www.opera.com/browser/tutorials/security/privacy/</a>
Safari:	<a href="https://support.apple.com/kb/ph19214?locale=tr_TR">https://support.apple.com/kb/ph19214?locale=tr_TR</a>

As a personal data subject, we'd like to inform that you have the following rights in accordance with Article 11 of the Law:

- To learn whether personal data is processed or not,
- If the personal data are processed, to request information about it,
- To learn the purpose of his data processing and whether this data is used for intended purposes,
- To know the third parties to whom personal data are transferred domestically or abroad,
- To request rectification of personal data in case of incomplete or incorrect processing, and requesting notification of the transaction performed within this scope to third parties to whom personal data has been transferred,
- Despite the fact that it has been processed in accordance with the provisions of the KVK Law and other relevant Laws, to request the erasure or destruction of personal data in case the purpose requiring its processing does not exist and to request informing the third parties to whom the personal data has been transferred,
- To object to the processing, exclusively by automatic means, of his personal data, which leads to an unfavorable consequence for the data subject,
- To request the compensation of the damage raising from the unlawful processing of his personal data.

You can send your applications regarding your rights listed above to our Company by filling out the Zeren Group Yatırım Holding Anonim Şirketi Data Subject Application Form, which you can access from the address of <https://zerengroup.com/en/data-protection>. Depending on the nature of your request, your applications will be concluded free of charge as soon as possible and within thirty days at the latest; however, if the transaction requires additional cost, you may be charged according to the Schedule to be determined by the Personal Data Protection Board.

The Data Subject undertakes that the information subject to The Clarification Text is complete, correct and up-to-date, and in case of any change in this information, it shall be updated immediately. The Company shall not have any liability in case the Data Subject has not provided up-to-date information.

The Data Subject declares and accepts that in case of making a request to be resulted in the non-use of any personal data by the Company, she/he shall not benefit from the functioning of the Site and shall be liable for all the responsibilities that will arise within this scope.