

COOKIE CLARIFICATION NOTICE

Information on the Processing of Personal Data via Cookies and Online Tracking Technologies

As KÜLAHÇIOĞLU DIŞ TİCARET VE SANAYİ LİMİTED ŞİRKETİ ("KÜLAHÇIOĞLU" or the "Company"), we utilize cookies, pixels, GIFs, and related tracking technologies (collectively "Cookies") to enhance your user experience during your visit to or usage of our websites ("Site"), applications, and all other online or offline digital platforms made available to you (collectively referred to as the "Platform").

The deployment of these technologies is conducted in strict compliance with the legislation to which we are subject, notably the Law No. 6698 on the Protection of Personal Data ("KVKK"). The purpose of this Cookie Clarification Notice is to inform you regarding the processing of personal data collected through cookies and tracking tools during your use of our Platforms, to explain the types and purposes of cookies deployed, and to outline how you can manage your preferences.

KÜLAHÇIOĞLU reserves the right to cease using existing cookies, modify their categories or functionalities, or deploy new cookies on our Site and applications. Consequently, we reserve the right to amend the provisions of this Notice at any time. Any changes become effective immediately upon publication on the Site, application, or any public channel.

For detailed information regarding our overall personal data processing practices, please consult our KVKK Clarification Notice available at www.kulahcioglu.com.

Method and Legal Basis for Collecting Personal Data

Your personal data is collected electronically via cookies when visiting our website or using our application, based on the legal grounds of the legitimate interests of our Company pursuant to Article 5(2)(f) of the KVKK (for strictly necessary and performance cookies). Marketing, targeting, and profiling activities are conducted strictly upon your explicit consent pursuant to Article 5(1) of the KVKK. Collected data may be processed in accordance with the data processing principles and conditions set forth in Articles 5 and 6 of the KVKK for the purposes specified in this Notice.

Authorized Transferees and Purposes of Transfer

KÜLAHÇIOĞLU may share personal data collected within the scope of this Notice with our suppliers, authorized public institutions, legally authorized private persons, business partners, affiliates, and group companies, limited strictly to fulfilling the purposes specified herein and in compliance with Articles 8 and 9 of the KVKK. Please note that recipient parties may store your data on servers located across various jurisdictions worldwide.

Purposes of Cookie Usage and Cookie Types

- **Executing Essential Site Functions:** Ensuring core website operations (e.g., maintaining logged-in member sessions across web pages without requiring re-authentication).
- **Analyzing and Optimizing Performance:** Integrating server clusters, measuring visitor volume, fine-tuning infrastructure latency, and facilitating ease of navigation.
- **Enhancing Functionality and Usability:** Remembering user selections, language preferences, search queries, and enabling third-party social media sharing.
- **Personalization, Targeting, and Advertising:** Delivering targeted advertisements and customized offers aligned with visitors' specific viewing history and interests.

1. Strictly Necessary Cookies (Essential)

These cookies are mandatory for the technical operation and basic functions of the website, such as authentication and session continuity.

Cookie Name	Provider / Domain	Duration	Description
VISITOR_PRIVACY_METADATA	YouTube (.youtube.com)	5 mos 4 wks	Stores user consent and privacy choices for interaction with embedded player.
CookieScriptConsent	CookieScript (kulahcioglu.com)	1 month	Remembers visitor cookie consent choices; essential for banner operation.
AMCVS_1FE034B8527850350A490D44%40AdobeOrg	Adobe (.kulahcioglu.com)	Session	Indicates session initialization for Adobe Experience Cloud tracking.

2. Performance and Analytics Cookies

These cookies enable us to evaluate traffic and system performance so that we can optimize our digital platforms and identify potential issues.

Cookie Name	Provider / Domain	Duration	Description
_ga_H7TTZ9YR23	Google (.kulahcioglu.com)	1 yr 1 mo	Used by Google Analytics to persist and maintain user session state.
_ga_K6DQZ9979C	Google (.kulahcioglu.com)	1 yr 1 mo	Used by Google Analytics to persist and maintain user session state.
s_cc	Adobe Inc. (.kulahcioglu.com)	Session	Adobe SiteCatalyst cookie determining if cookies are active in browser.
_ga	Google LLC (.kulahcioglu.com)	1 yr 1 mo	Primary Google Analytics identifier distinguishing unique users via random client ID.

3. Targeting and Advertising Cookies

These cookies track browsing habits across domains to deliver relevant promotional content and monitor the effectiveness of ad campaigns.

Cookie Name	Provider / Domain	Duration	Description
demdex	Adobe Inc. (.demdex.net)	5 mos 4 wks	Helps Adobe Audience Manager with ID

			synchronization, audience segmentation, and reporting.
dpm	Adobe Inc. (.dpm.demdex.net)	5 mos 4 wks	Adobe Audience Manager data platform cookie utilized to sync cross-domain user IDs.
AMCV_1FE034B8527850350A490D44%40AdobeOrg	Adobe (.kulahcioglu.com)	1 yr 1 mo	Stores a unique visitor ID for Adobe Marketing Cloud to track users across company domains.
YSC	Google LLC (.youtube.com)	Session	Assigned by YouTube to track embedded video view statistics and metrics.
VISITOR_INFO1_LIVE	Google LLC (.youtube.com)	5 mos 4 wks	Tracks user bandwidth/preferences for YouTube embeds; detects interface version.

4. Functional Cookies

None currently deployed on the Platform.

5. Unclassified Cookies

Cookie Name	Provider / Domain	Duration	Description
.AspNetCore.Antiforgery.5l-NWb89Pzs	.kulahcioglu.com	Session	Security token preventing cross-site request forgery (CSRF).
__Secure-ROLLOUT_TOKEN	.youtube.com	5 mos 4 wks	Security token supporting service rollout integrity.

Rolex Section:

While navigating on the Rolex section of our website, some cookies are controlled by ROLEX SA which applies the following [Cookies Policy](#).

How Can You Control the Use of Cookies?

The preferences of our visitors regarding cookie deployment are paramount to us. However, cookies strictly necessary for the technical operation of the Platform cannot be disabled without compromising functionality. Disabling certain preference or analytics cookies may render specific platform features partially or completely inaccessible.

You may manage your cookie preferences through the following channels:

- **Browser Settings:** You can customize permissions directly in your browser settings (e.g., block all cookies, receive an alert prior to storage, or delete stored cookies). Guidance is accessible at www.aboutcookies.org.
- **Opt-Out Portals:** You can opt out of Google Analytics via tools.google.com/dlpage/gaoptout, manage Google ad personalization at support.google.com/ads, and manage multi-vendor advertising cookies at www.youronlinechoices.com.
- **Mobile Devices:** Cookie permissions can be adjusted within your mobile operating system's privacy settings.

Direct Browser Cookie Management Guides

Browser / Service	Management & Opt-Out Link
Adobe Analytics	http://www.adobe.com/uk/privacy/opt-out.html
AOL	https://help.aol.com/articles/restore-security-settings-and-enable-cookie-settings-on-browser
Google AdWords	https://support.google.com/ads/answer/2662922?hl=en
Google Analytics	https://tools.google.com/dlpage/gaoptout
Google Chrome	http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647
Internet Explorer	https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies
Mozilla Firefox	http://support.mozilla.com/en-US/kb/Cookies
Opera	http://www.opera.com/browser/tutorials/security/privacy/
Safari	https://support.apple.com/kb/ph19214?locale=tr_TR

Your Rights as a Data Subject Under Article 11 of KVKK

Pursuant to Article 11 of Law No. 6698, data subjects have the right to:

- Learn whether personal data is processed;
- Request information if personal data has been processed;
- Learn the purpose of data processing and whether data is used in accordance with its purpose;
- Know the third parties in Turkey or abroad to whom personal data is transferred;
- Request rectification of incomplete or inaccurate data and notification to third-party recipients;
- Request erasure or destruction of personal data when reasons for processing cease to exist;
- Object to results detrimental to themselves resulting from exclusively automated processing;
- Demand compensation for damages incurred due to unlawful data processing.

You may submit your statutory requests by completing the Data Subject Application Form available at www.kulahcioglu.com. Inquiries will be concluded free of charge as soon as possible and within thirty (30) days at the latest.