

CLARIFICATION NOTICE ON THE PROTECTION OF PERSONAL DATA

Information Notice in Compliance with Article 10 of Law No. 6698 on the Protection of Personal Data (KVKK)

Dear Visitors, Members, and Customers,

In accordance with the Law No. 6698 on the Protection of Personal Data ("KVKK"), KÜLAHÇIOĞLU DIŞ TİCARET VE SANAYİ LİMİTED ŞİRKETİ ("Kulahçioğlu" or the "Company"), acting in its capacity as the Data Controller, provides this Clarification Notice pursuant to its statutory obligation to inform under Article 10 of the KVKK. This text aims to transparently inform you regarding the processing of your personal data and your statutory rights as a data subject.

This Clarification Notice covers data processing activities in connection with:

- Visiting physical KÜLAHÇIOĞLU retail stores ("Stores") and/or making purchases from our Stores;
- Visiting the official KÜLAHÇIOĞLU website accessible at www.kulahcioglu.com ("Site");
- Consenting to commercial electronic communications, including generalized or personalized campaign updates;
- Contacting us mutually via our designated Communication Channels;
- Participating in campaigns, contests, sweepstakes, drawings, or other events organized by KÜLAHÇIOĞLU.

As KÜLAHÇIOĞLU, we deploy cookies and tracking mechanisms on our Site to perform statistical analyses regarding site usage, deliver targeted advertisements/promotions, and ensure an efficient, frictionless customer experience. For comprehensive details regarding cookies, please review the Cookie Policy available on our website.

1. Purposes of Processing and Categories of Personal Data Processed

When You Visit Our Physical Stores:

- **Store Security Surveillance:** CCTV video recordings in stores are processed to safeguard you, KÜLAHÇIOĞLU, our staff, and third parties against potential unlawful acts, infractions, or crimes, to fulfill contractual obligations regarding shopping mall locations, and to comply with legal submission requirements before judicial or administrative bodies.
- **Stock Notification Requests (Name, surname, phone number, email, address):** Processed to notify you when an out-of-stock or requested product arrives in store upon your demand.
- **Technical Service & Maintenance (Name, surname, phone number, email, address):** Processed to facilitate after-sales technical maintenance and service requests.

When You Make Purchases at Our Stores:

- **Transaction & Invoicing Data (Name, surname, city/district, purchase date, time, quantity, items, payment method and details):** Processed to execute retail transactions, establish and perform sales contracts, issue commercial invoices, and manage accounting workflows.
- **E-Invoice Delivery (Email address):** Processed to deliver electronic commercial invoices (e-invoice / e-archive) to you electronically.
- **Tax Refund Compliance (Turkish Republic ID No and/or Passport Number):** Collected if you reside abroad and request tax refund processing (Tax-Free / VAT return).

- **After-Sales Support (Name, mobile phone, email, address, and physical signature):** Processed to provide post-sale support (tailoring, alterations, exchanges, returns, product examination) and maintain financial records where an expense slip (gider pusulası) is issued.
- **Gift Card Data:** Name, phone number, card number, and balance are processed on receipts to ensure accurate loading, verify ownership, check limits, and handle card requests (or pulled from your Kartuş loyalty membership for convenience). When purchases are completed using gift cards, the purchaser identity, card usage logs, and transactional history are recorded.
- **Card Payment Information:** Credit/debit card data is routed directly to the authorized payment institution without being recorded or stored on KÜLAHÇIOĞLU servers; Kartuş loyalty card data is processed if elected.
- **Statutory Invoicing Thresholds:** If your purchase amount exceeds statutory invoicing thresholds, or where legally mandated, Turkish ID Numbers or sole proprietorship business details are processed to satisfy mandatory tax invoicing requirements.

When You Visit Our Website / Mobile Application:

When visiting our Website or Mobile Application, we process navigation data, session timestamps, and browsing history via cookies and tracking tools to perform statistical usage analytics, offer personalized promotions, and improve the digital customer experience. Please consult our Cookie Policy on our website for detailed information.

Rolex Section:

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

Purchases Dispatched to or Received by a Third Party:

- **Shipment to Third Parties:** When you order items to be delivered to third parties, we process their recipient address and full name exclusively to fulfill shipment and provide post-sale services. The legal obligation to inform the recipient regarding this data disclosure rests with you.
- **Orders Sent to You by Third Parties:** When products or gifts are dispatched to your address by a third party, your recipient address and full name are processed solely to execute delivery and manage warranty/after-sales support.

When Commercial Electronic Communication Consent Is Granted:

Upon granting commercial communication consent/explicit consent via any channel, your name, surname, user ID, mobile phone number, email address, consent log records, and physical signature (if consented in-store) are processed to deliver customized promotional offers, product announcements, satisfaction surveys, special campaigns, sweepstakes, event invitations, and marketing notices via your chosen channels (SMS, email, etc.).

When Contacting Us via Customer Communication Channels:

When reaching out via our Call Center, email, website, WhatsApp, social media, or other communication channels:

- Name, social media username, email address, mobile phone number, landline (if shared), clothing/shoe sizes, dispute details, inquiry/complaint text, Kartuş card or gift card data (number, balance, usage history), and system audit logs are processed to resolve inquiries, verify identity, manage customer relations, and enhance service quality standards.
- Call center voice audio recordings and WhatsApp message transcripts are processed to evaluate customer satisfaction and serve as legal evidence in potential disputes.

- In-store CCTV surveillance footage is reviewed if your request or complaint concerns physical store occurrences.
- Digital order history, commercial invoices, and loyalty points/discounts redeemed are processed if inquiries pertain to online purchases.

Legal Compliance, Internal Audits, and Corporate Operations:

To ensure security against unlawful conduct, fulfill statutory obligations before judicial and administrative bodies, exercise rights of defense and lawsuit, conduct internal audits, tests, reporting, risk analysis, and maintain burden-of-proof records, your identity details, transaction histories, financial payment parameters (first 6 and last 4 digits of card, payment amount, issuing bank, reference number), digital connection logs (IP address, User ID, Facebook ID if linked), and consent acknowledgments are processed accordingly.

For Online Visitors, cookie logs (IP address, browsing information, device identifiers, and traffic data) are processed to ensure IT security, prevent malicious activities, and satisfy public regulatory reporting obligations.

2. Methods of Data Collection and Legal Grounds

We collect personal data through automated methods (surveillance cameras, automated store POS registers, digital website/app logging, cookies, call center voice recordings, WhatsApp messaging logs) and non-automated methods (forms submitted physically, documents submitted by administrative or judicial authorities, physical return/warranty forms).

Your personal data is processed under the legal grounds set forth in Articles 5 and 6 of the KVKK:

- Processing is directly necessary for the establishment or performance of a sales and after-sales contract;
- Processing is mandatory for the legitimate interests of the data controller, provided it does not prejudice fundamental rights and freedoms (e.g., restock alerts, store surveillance, service optimization);
- Processing is mandatory for the data controller to fulfill its legal obligations or explicitly stipulated by laws;
- Processing is mandatory for the establishment, exercise, or defense of a legal right;
- The personal data has been made public by the data subject themselves;
- Explicit consent (specifically for marketing electronic messages, which may be revoked at any time without justification via the opt-out mechanism provided in messages).

3. Authorized Transferees and Purposes of Transfer

In compliance with Articles 8 and 9 of the KVKK, personal data may be shared strictly on a need-to-know basis with:

- Domestic and international business partners, suppliers, and service providers (messaging providers, call centers, marketing/analytics providers, server and cloud hosts, IT maintenance and software licensing partners, legal and financial consultants, e-invoice providers, independent auditors, cargo/courier and warehouse companies) strictly limited to the execution of Kūlahçioğlu operations;
- Authorized public institutions, administrative directorates, and judicial authorities to fulfill statutory reporting obligations and exercise or defend legal claims;
- Payment institutions and specialized consultants for tracking suspicious transactions and preventing fraud;
- Relevant banks and electronic payment service providers for processing card payments without local retention;
- Authorized branch dealers sharing our unified customer management and cashier system.

4. Rights of the Data Subject under Article 11 of KVKK

Pursuant to Article 11 of the KVKK, you have the right to: (a) learn whether your personal data is processed, (b) request information if processed, (c) learn the purpose of processing and whether data is used accordingly, (d) know domestic or foreign third parties to whom data is transferred, (e) request rectification of incomplete or inaccurate data, (f) request erasure or destruction of data under statutory conditions, (g) request notification of rectification/erasure to transferees, (h) object to detrimental results arising solely from automated processing, and (i) claim compensation for damages incurred due to unlawful processing.

You may submit your statutory requests in accordance with the Communiqué on the Principles and Procedures for the Request to Data Controller to the contact details below:

Data Controller	KÜLAHÇIOĞLU DIŞ TİCARET VE SANAYİ LİMİTED ŞİRKETİ
Postal Address	Akdeniz Mahallesi, Atatürk Caddesi No: 19/Z22, Konak / İzmir, Türkiye
Email Address	muhassebe@kulahcioglu.com
Registered Email (KEP)	[Company KEP Address]

You may also utilize the Data Subject Application Form accessible at www.kulahcioglu.com. Applications will be finalized free of charge within thirty (30) days at the latest.