

## ECZACIBAŐI MOMENTUM COOKIE DISCLOSURE

### A. Data Controller

We, as Eczacıbaşı Momentum Teknoloji Yatırımları Anonim Őirketi ("**Eczacıbaşı Momentum**" or the "**Company**"), prioritize protection of your personal data and processing your personal data in a transparent and legitimate manner. We recommend that you carefully read this Disclosure explaining the purposes for which we process your personal data obtained through cookies, your rights as **Data Subject** and our obligations as Eczacıbaşı Momentum.

This text informs you about the processing of personal data obtained automatically through the placement of cookies on your device; which are used to improve your experience during your use or visit to our website ("**Site**"), which types of cookies we use for what purposes, the legal grounds for the use of such cookies, how you can manage these cookies and your rights.

We, as Eczacıbaşı Momentum, act in the capacity of Data Controller for the processing of your personal data under the Law No. 6698 on Protection of Personal Data (the "**Law**").

### B. What is a Cookie?

Cookies are small text files that are downloaded to your device when you visit a website. Cookies are also sent back to the original website or to another website that recognizes that cookie and act like a memory for a website, allowing the website to remember details about previous visits. For instance, cookies can remember end-user preferences, improve user experience and also tailor content to the elements that are most relevant to end-users.

Further general information about cookies is available at [www.aboutcookies.org](http://www.aboutcookies.org).

### C. Our Purposes of Processing Your Personal Data and the Legal Grounds

We process your personal data collected through cookies within the personal data processing conditions specified in Article 5 of the Law and the purposes ("Purposes") specified below for each type of cookie. The purposes of processing data according to the type of the relevant cookie used and the data processing condition/legal grounds under the Law that we rely on when using the relevant cookie are provided below.

#### ***Strictly Necessary Cookies***

Strictly necessary cookies are cookies that are placed on your device when viewing the Site and are necessary for the proper functioning of the website. We rely on the legal grounds that "***It is necessary to process personal data belonging to the parties to the contract, provided that it is directly related to the establishment or performance of a contract***" and "***It is mandatory to process data for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject***" under article 5/2-c of the Law for the data processing activities we carry out during the use of these cookies.

#### ***Functionality Cookies***

Functionality cookies are used to improve the functionality of the Site and to provide ease of use. We rely on the legal ground "**explicit consent**" under article 5/1 of the Law for the data processing activities we carry out during the use of these cookies.

#### ***Performance and Analytics Cookies***

Performance cookies are used to track and analyze the number of people viewing the Site and Site traffic. These cookies allow us to adjust the performance settings of the Site or to facilitate visitors to find what they are looking for. We rely on the legal ground "**explicit consent**" under article 5/1 of the Law for the data processing activities we carry out during the use of these cookies.

#### ***Advertising and Marketing Cookies***

These cookies are used to perform personalization, targeting and advertising activities with personalized advertising cookies and to combine your data if you have given marketing permission to Eczacıbaşı. We rely on the legal ground "**explicit consent**" under article 5/1 of the Law for the data processing activities we carry out during the use of these cookies.

#### **D. Personal Data Processed Through Cookies**

Under the purposes and legal grounds set out in section C. *Our Purposes of Processing of Your Personal Data*, we process your user transaction information, including user identification/ID, IP address, browser and operating system, date and time of visit, interaction status (for instance, whether you were able to access the website or received an error message), use of features on the website, search phrases you entered, how often you visit the website, your language preferences, scrolling movements, information about the tabs you accessed.

#### **E. Type of Cookies Used on the Website**

**The cookies used on the Website, provider of these cookies, intended use and duration of use of the same are given in the table below.**

<b>Strictly Necessary Cookies</b>				
<b>Cookie Name</b>	<b>Provider</b>	<b>First Party/Third Party</b>	<b>Intended use</b>	<b>Duration of Use</b>
<b>strictly_necessary_identification_details</b>	Eczacıbaşı	First party cookie	Necessary for the functioning of the website.	1 year
<b>Close_cookie</b>	Eczacıbaşı	First party cookie	Necessary for the functioning of the website.	1 year

<b>Functionality Cookies</b>				
<b>Cookie Name</b>	<b>Provider</b>	<b>First Party/Third Party</b>	<b>Intended use</b>	<b>Duration of Use</b>
<b>functional_identification_details</b>	Eczacıbaşı	First party cookie	Necessary for the functioning of the website.	3 months

<b>Performance and Analytics Cookies</b>				
<b>Cookie Name</b>	<b>Provider</b>	<b>First Party/Third Party</b>	<b>Intended use</b>	<b>Duration of Use</b>
<b>performance_identification_details</b>	Eczacıbaşı	First party cookie	Necessary for the functioning of the website.	3 months
<b>__utma,</b>	Google Inc.	Third party cookie	Used by Google Analytics to throttle request rate.	1 hour
<b>__utmb,</b>	Google Inc.	Third party cookie	Used by Google Analytics to throttle request rate.	1 hour
<b>__utmc,</b>	Google Inc.	Third party cookie	Used by Google Analytics to throttle request rate.	1 hour
<b>__utmz,</b>	Google Inc.	Third party cookie	Used by Google Analytics to throttle request rate.	1 hour
<b>_ga,</b>	Google Inc.	Third party cookie	Used by Google Analytics to throttle request rate.	1 hour
<b>_gat</b>	Google Inc.	Third party cookie	Used by Google Analytics to throttle request rate.	1 hour

<b>Advertising and Marketing Cookies</b>				
<b>Cookie Name</b>	<b>Provider</b>	<b>First Party/Third Party</b>	<b>Intended use</b>	<b>Duration of Use</b>
<b>targeting_intended_identification_details</b>	Eczacıbaşı	First party cookie	Necessary for the functioning of the website.	3 months
<b>__utma</b>	Google Inc.	Third party cookie	It allows to examine the overall performance of the site by anonymously analyzing the movements of users within the site.	2 years
<b>__utmb</b>	Google Inc.	Third party cookie	It allows to examine the overall performance of the site by	2 years

			anonymously analyzing the movements of users within the site.	
__utmc	Google Inc.	Third party cookie	It allows to examine the overall performance of the site by anonymously analyzing the movements of users within the site.	2 years
__utmz	Google Inc.	Third party cookie	It allows to examine the overall performance of the site by anonymously analyzing the movements of users within the site.	2 years
_ga	Google Inc.	Third party cookie	It allows to examine the overall performance of the site by anonymously analyzing the movements of users within the site.	2 years
_gat	Google Inc.	Third party cookie	It allows to examine the overall performance of the site by anonymously analyzing the movements of users within the site.	2 years

#### **F. Third Parties with Whom Personal Data is Shared and Purposes of Sharing**

We share your personal data with our Eczacıbaşı group companies, suppliers and business partners at home and abroad (for instance, obtaining infrastructure support from a supplier to retain your information) and with Eczacıbaşı Group Companies for the purposes of ensuring coordination in business processes and compliance with group policies, conducting review and audit processes within the scope of the purposes and legal grounds set out in this disclosure text. We also share your personal data with authorized institutions and organizations in order to fulfill our legal obligations in cases where authorized institutions or organizations request information or documents from our Company or in cases where we are required to notify these institutions.

We comply with the rules set forth in articles 8 and 9 of the Law when sharing your personal data with the parties mentioned herein.

#### **G. Our Method of Collecting Your Personal Data**

We collect your personal data electronically through cookies by automated methods.

#### **H. Prevention of Cookie Usage**

In order to prevent cookies from being placed on your computer or mobile device from this website, you can use the Cookie Preferences Panel as well as change your browser and/or mobile device settings. You can change the browser's settings so that it mostly rejects new cookies, deactivates existing cookies or only notifies you when new cookies are sent to your device.

However, the Cookies strictly necessary for the Site to function are mandatory. We would like to remind you that certain functions of the Site may be deactivated in part or as a whole if strictly necessary cookies are not used.

Information regarding how you can manage your preferences regarding the cookies used on the Site is as follows:

Visitors are allowed to customize their preferences about the cookies by way of changing the settings of the browser they view the Site respectively. If allowed by your browser, you may change your preferences about the cookies over its settings. Thus, although varied by the respective opportunities offered by the browsers in use, visitors are allowed to block the use of cookies, prefer to be notified before cookies are to be used, or to deactivate or delete some of the cookies.

A general explanation regarding the termination of cookie usage is available at <https://www.aboutcookies.org/> Furthermore, you can set the cookies to be used according to your preferences by clicking on the **Cookie Preferences** link.

#### **I. Your Rights Regarding Your Personal Data**

Article 11 of the Law on Protection of Personal Data regulates "**the rights of the data subject**". Any natural person whose personal data is processed by Eczacıbaşı Momentum is entitled to apply to our Company in accordance with the Law and to exercise his/her legal rights enumerated in the Law.

When applying to our Company to exercise your rights, you can choose one of the following methods by filling out the **Data Application Form** on our website:

- **By mail**, you can send it in writing to the address of our Company at Kanyon Ofis, Büyükdere Cad. No: 185 Levent 34394 Istanbul/Turkey.

- **By using your e-mail address registered in our systems**, you can send an e-mail to the e-mail address [momentumkvkk@eczacibasi.com.tr](mailto:momentumkvkk@eczacibasi.com.tr) with your request.

You can use the other methods specified in the Communiqué on the Procedures and Principles Regarding Application to the Data Controller.

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 procedure requires an additional cost, you may be charged a fee according to the tariff to be determined by the Personal Data Protection Board.