

JTI TÜRKİYE PERSONAL DATA DISCLOSURE *for VISITORS*

This Disclosure Notice on the Protection of Personal Data (Disclosure Notice) has been prepared by JTI Tütün Ürünleri Pazarlama A.Ş. ("JTI") as the "data controller" in order to fulfill the disclosure obligation within the scope of Article 10 of the Personal Data Protection Act No. 6698 ("PDPA") and the Communiqué on the Procedures and Principles to be followed in the Fulfillment of the Disclosure Obligation.

DATA CONTROLLER INFORMATION

JTI Tütün Ürünleri Pazarlama A.Ş.

Torbalı Mahallesi 2561 Sokak No:12

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jtitutunurunleripazarlama@hs03.kep.tr

PERSONAL DATA IN PROCESS

JTI processes your personal data in a way that does not violate your fundamental rights and freedoms, in accordance with the law and in compliance with all legal obligations under the PDPA. Thus, JTI processes your following personal data:

CATEGORY

PERSONAL DATA

ID INFORMATION

Name surname, ID No, plate no etc.

CONTACT INFORMATION

Phone number, email etc.

PREMISES SECURITY

Employee and visitor entry and exit recordings, surveillance footage etc.

OPERATION SECURITY

IP address, website log information etc.

PURPOSE OF PERSONAL DATA PROCESSING

JTI processes the following categories of data for the purposes listed below and maintains your personal data for the maximum period necessary for the purpose for which they are processed and, in any case, for the mandatory periods set forth in the legislation:

PERSONAL DATA IN PROCESS

PURPOSE

LEGAL GROUND

- ID INFORMATION
- CONTACT INFORMATION
- PREMISES SECURITY

- For workplace safety
- For preventing unauthorized entry to the workplace, and to identify trespassers in case of unauthorized entry
- For identifying the visitors who enter the workplace
- In case of emergency, in order to reach the visitors in the shortest and most effective way and to ensure evacuation
- For the preparation and delivery of information and documents requested by authorities or in line with legal obligations
- In order to ensure, establish and maintain visitor and employee safety

- Data processing is mandatory for the establishment, exercise or protection of a right,
- Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject,
- Data processing is mandatory for JTI to fulfill its legal obligations

- ID INFORMATION
- CONTACT INFORMATION

- In order to carry out, record and monitor visitor entry and exit procedures
- In order to be able to issue a special card to the visitor
- In order to identify the visitor

- Data processing is mandatory for the establishment, exercise or protection of a right,
- Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject,

- OPERATION SECURITY

- In order to ensure workplace wireless and/or wired network security

- Data processing is mandatory for the establishment, exercise or protection of a right,
- Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject,

DOMESTIC & INTERNATIONAL TRANSFER OF PERSONAL DATA

In line with the above-mentioned purpose, JTI may transfer your personal data to third parties in the listed group for the following purposes:

PERSONAL DATA IN TRANSFER

PURPOSE

TRANSFER METHOD & TRANSFERRED PERSONS

- ID INFORMATION
- CONTACT INFORMATION
- PREMISES SECURITY

- Ensuring the safety of other companies sharing the same workplace with JTI and their employees

It is shared in digital or printed media within the scope of the data subject's visit to JTI Tütün Ürünleri Sanayi A.Ş. (+90 (232) 850 0230 - jtitutunurunlerisanayi@hs03.kep.tr) and JTI Yaprak Tütün Sanayi ve Ticaret A.Ş. (+90 (232) 850 0230 - jtiyapraktutun@hs03.kep.tr), which are located on the same campus with JTI.

- ID INFORMATION
- CONTACT INFORMATION
- PREMISES SECURITY
- OPERATION SECURITY

- Meeting requests from public authorities or fulfilling legal obligations

Documents in official correspondence with public authorities or in the annexes of these correspondences can be shared in digital or printed media.

- ID INFORMATION
- CONTACT INFORMATION
- PREMISES SECURITY
- OPERATION SECURITY

- If JTI obtains security services from a third party or establishes a business partnership with a third party for the purpose of providing security services, in order to carry out all security operations

JTI's subcontractor, business partner or any other third party undertaking security services, and their employees or other third parties designated by them, in digital or printed media.

- ID INFORMATION
- CONTACT INFORMATION
- PREMISES SECURITY
- OPERATION SECURITY

- Conducting audits, assessments, examinations, inspection, intelligence and investigation activities carried out by JTI Global entities located abroad which JTI engages in joint economic activities

In order to ensure the security of life and property of individuals and supervision for reasons of audits, assessments, examinations, inspection, intelligence and investigation, JTI Global subsidiaries or those subsidiaries located abroad, in which JTI is engaged in joint economic activities, in digital or printed media for incidental purposes.

DATA COLLECTION METHOD & LEGAL REASON

JTI collects your personal data during or after visitor registration, either directly from you or through the recording of surveillance footage or through the card and card readers issued to you or in any other way, limited to the duration of your visit. JTI collects data in line with its legitimate interests in ensuring the security of you as a visitor, its employees, the workplace and other persons sharing the same workplace and their employees, provided that it does not harm your fundamental rights and freedoms and in cases expressly stipulated in the laws within the scope of Article 5/2 of the PDPA, in cases where it is mandatory for the fulfillment of legal obligations, in cases where data processing is mandatory for the establishment or protection of a right and in accordance with Article 5/2-f of the PDPA, provided that it does not harm your fundamental rights and freedoms. Legal grounds are also stated in the table above.

YOUR RIGHTS AS A DATA SUBJECT

Within the scope of Article 11 of the PDPA, everyone has the right to apply to the data controller:

- To learn whether their personal data is being processed or not,
- Request information if their personal data has been processed,
- To learn the purpose of processing personal data and whether they are used for their intended purpose,
- To know the third parties to whom personal data are transferred domestically or abroad,
- To request correction of personal data in case of incomplete or incorrect processing,
- To request the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of the PDPA,
- To request notification of the transactions made pursuant to subparagraphs (d) and (e) of Article 11 of the PDPA to third parties to whom personal data are transferred,
- To object to the emergence of a result to the detriment of the person themselves by analyzing the processed data exclusively through automated systems,
- In case of damage due to unlawful processing of personal data, to demand compensation for the damage,

If you apply to JTI regarding your rights stated above, your request will be answered free of charge within 30 (thirty) days at the latest depending on the nature of your request.

You are required to submit your application in writing and with wet signature, in a clear and understandable manner and by attaching documents identifying your identity and address information, in person, by post or through a notary public to *Torbali Mahallesi 2561 Sokak No: 12/2 Torbali İzmir* or through email to the kvk@jti.com. Depending on the nature of your request and your application method, additional verifications (such as sending a message to your registered phone, calling you, etc.) may be requested in order to determine whether the application belongs to you and thus protect your rights.