OPET PETROLCÜLÜK A.Ş.
CUSTOMER / CORPORATE CUSTOMER PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

Your personal data may be processed by Opet Petrolcülük A.Ş. ("**Company**"), acting in its capacity as the data controller, within the scope described below pursuant to the Personal Data Protection Law No. 6698 ("**Law**").

Personal Data Collected

Within the scope of carrying out our Company's activities, the following personal data may be processed:

Personal Data Category	Specific Personal Data
Identity Information	Name and surname, date and place of birth, Turkish Republic identification number/foreigner identification number, nationality, signature information, tax identification number
Contact Information	E-mail address, contact address, telephone number
Customer Transaction Information	Purchase and sale transaction information, request and complaint information, company information, product and service usage information, membership/card activation information, order information, transaction date, transaction amount, transaction point/station information, campaign, points, rewards, sweepstakes and competition participation information, customer satisfaction and feedback information
Financial Information	Payment and collection information, invoice information, payment method information, bank account information (where necessary), financial transaction records
Marketing Information	Cookies and other tracking technology logs, promotion-based information, card spending information, information regarding products you have reviewed, your service channel preferences, your customer profile information

Purposes and Legal Basis for Processing Personal Data

Your personal data collected may be processed for the purposes set out below ("**Purposes**"), within the scope of the personal data processing conditions and purposes specified under Article 5 of the Law.

For all our customers;

Personal Data Categories	Personal Data Processing Purposes	Legal Basis
• Identity Information • Contact Information • Customer Transaction Information • Financial Information • Marketing Information	• Fulfilment of requests received from official institutions, • Provision of information to authorized institutions as required by legislation, • Ensuring compliance with retention obligations stipulated by legislation, • Responding to applications of data subjects in accordance with legislation and carrying out the necessary procedures	***Expressly stipulated by laws and being necessary for the data controller to fulfil its legal obligations***
• Identity Information • Contact Information • Customer Transaction Information • Financial Information	• Monitoring of financial transactions, including invoicing activities related to the sale of products and services carried out, • Carrying out the necessary work by our business units and conducting the	***Being necessary for the processing of personal data of the parties to a contract, provided that it is directly***

	relevant business processes in order to enable data subjects to benefit from the products and services offered by the Company, • Conducting warranty processes, where applicable, • Provision of after-sales support services.	***related to the establishment or performance of a contract***
• Identity Information • Contact Information • Customer Transaction Information • Financial Information	• Monitoring financial transactions, • Carrying out the necessary work by our business units and conducting the relevant business processes in order to enable data subjects to benefit from the products and services offered by our Company, including the sales and marketing activities of our products and services, • Carrying out the necessary work by our relevant business units and conducting the related business processes for the execution of commercial activities carried out by our Company, • Ensuring the legal, technical and commercial-business security of our Company and the relevant persons having a business relationship with our Company, • Determination and implementation of our Company's commercial and business strategies, • Planning and execution of customer relationship management processes	***Being necessary for the purposes of the legitimate interests pursued by the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject***
• Identity Information • Contact Information • Customer Transaction Information	• Creation of records in the system relating to product and service sales carried out, • Updating customer contact information	***Being necessary for the purposes of the legitimate interests pursued by the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject***
• Identity Information • Contact Information	• Management of corporate communication activities, • Event management	***Being necessary for the purposes of the legitimate interests pursued by the data controller, provided that it does not harm the***

		fundamental rights and freedoms of the data subject
• Identity Information • Contact Information • Customer Transaction Information • Financial Information	• Serving as evidence in possible disputes that may arise in the future, • Receiving, evaluating and resolving your requests and complaints	***Based on the legal basis that processing is necessary for the establishment, exercise or protection of a right***
• Identity Information • Contact Information • Marketing Information	• Carrying out marketing processes relating to the Company's products and services, and recommending and promoting the products and services offered by customizing them according to your preferences, usage habits and needs, including profiling and analysis activities	***Where your explicit consent is available***
• Identity Information • Contact Information	• Sending commercial electronic communications such as advertisements, promotions, etc. to your contact details via SMS, telephone calls and e-mail	***Where your explicit consent is available***

If you are an Opet Card customer, in addition to the above;

Personal Data Categories	Personal Data Processing Purposes	Legal Basis
• Identity Information • Contact Information • Customer Transaction Information • Financial Information	• Creation of your Opet Card membership, performance of card activation procedures and management of the membership relationship, • Carrying out the operational processes necessary for providing you with the products and services associated with the Opet Card you have requested, • Management of orders and the processes relating to the provision of products and services offered within the scope of Opet Card	***Being necessary for the processing of personal data belonging to the parties to a contract, provided that it is directly related to the establishment or performance of a contract***
• Identity Information • Contact Information • Customer Transaction Information • Financial Information	• Prevention of fraud risks during payment transactions, auditing suspicious transactions and sales, carrying out control and analysis activities regarding transaction security	***Being necessary for the purposes of the legitimate interests pursued by the data controller, provided that it does not harm the fundamental***

		rights and freedoms of the data subject
• Identity Information • Contact Information • Customer Transaction Information	• Conducting customer satisfaction processes, including the implementation of satisfaction surveys and collection of feedback, • Conducting organizations such as reward programmes, sweepstakes and competitions in which you participate	***Being necessary for the purposes of the legitimate interests pursued by the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject***

If you are a Mavi Program customer, in addition to the above;

Personal Data Categories	Personal Data Processing Purposes	Legal Basis
• Identity Information • Contact Information • Customer Transaction Information • Financial Information	• Creation of your Mavi Program membership and management of the membership relationship	***Being necessary for the processing of personal data belonging to the parties to a contract, provided that it is directly related to the establishment or performance of a contract***
• Identity Information • Contact Information • Customer Transaction Information • Financial Information	• Planning, monitoring and operational improvement of Mavi Program processes, • Measuring and reporting the performance of the Mavi Program and carrying out activities aimed at improving service quality	***Being necessary for the purposes of the legitimate interests pursued by the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject***

If you are an Opet Pay Wallet user, in addition to the above;

The financing services provided under the “Buy Now, Pay Later” feature within the Opet Pay Wallet are provided by DGFİN Finansman A.Ş., and the electronic money services are provided by DGpara Ödeme ve Elektronik Para Kuruluşu A.Ş.If you are an Opet Pay Wallet user and benefit from the aforementioned financial services, detailed information regarding the processing of your personal data by the companies with which we cooperate can be found in the information notices available at the addresses below:

- DGFİN Finansman A.Ş. Customer Information Notice: https://drive.google.com/file/d/1c1KTLqG_SQqcNb0_2kYGatUmc5WM1-7T/view?usp=sharing
- DGpara Ödeme ve Elektronik Para Kuruluşu A.Ş. Customer Information Notice: https://www.dgpara.com/files/opetcuzdanaydinlatmametni.pdf

In addition to the above, your information obtained during your use of the Opet Pay Wallet may be processed by Opet as follows:

Personal Data Categories	Personal Data Processing Purposes	Legal Basis
• Identity Information • Contact Information • Customer Transaction Information • Financial Information	• Development of our Opet Pay services, including the planning of internal Company business strategies, • Carrying out activities aimed at ensuring the legal and economic security of our Opet Pay services and our Company	***Being necessary for the purposes of the legitimate interests pursued by the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject***

<u>To Whom and For What Purposes Processed Personal Data May Be Transferred</u>

Your personal data may be transferred within the scope of the personal data processing conditions set out in Article 5 of the Law and in accordance with the rules regarding the transfer of personal data specified under Articles 8 and 9 of the Law.

Recipients of the Transfer	Purpose and Legal Basis of Transfer
• Our Business Partners *(Refers to parties with whom we have a cooperation or business partnership relationship)*	***Based on the legal basis that processing is necessary for our legitimate interests, provided that it does not prejudice your fundamental rights and freedoms:*** • *Conduct of our business activities,* • *Follow-up and management of legal processes.* *In cases where these parties are located abroad, in addition to the above, the relevant transfer shall be carried out based on the existence of standard contracts announced by the Personal Data Protection Board*
• Our Suppliers *(Refers to all third-party service providers from whom goods and services are procured in order to provide our services and carry out our activities. For example: consultancy firms, parties providing information technology infrastructure services, engineering firms, law firms, translation agencies, cargo/courier/distribution companies, inspection/audit/archive firms, valuation and appraisal firms, technical maintenance, repair, control and monitoring firms, etc.)*	***Based on the legal bases underlying the Purposes specified above, within the scope of fulfilling such Purposes:*** • *Receiving consultancy, information security, archiving and support services for the fulfilment of the above-mentioned Purposes by our Company.* *In cases where these parties are located abroad, in addition to the above, the relevant transfer shall be carried out based on the*

	existence of standard contracts announced by the Personal Data Protection Board
• Legally Authorized Public Institutions and Legally Authorized Private Organizations *(Refers to private and public institutions and organizations authorized to request information and documents due to the relevant legal regulations or legal processes, public and private institutions and organizations to which information transfer is mandatory pursuant to legal regulations, and public and private institutions and organizations from which we obtain information verification to ensure legal transaction security. For example: BDDK, SPK, TCMB, Ministry of Treasury and Finance, MASAK, The Banks Association of Turkey Risk Center, Revenue Administration, Social Security Institution, Central Securities Depository, Credit Bureau, judicial authorities, notaries public, Union of Turkish Notaries, Registered Electronic Mail service providers, etc.)*	***Based on the legal basis that it is expressly stipulated by laws and necessary for the data controller to fulfil its legal obligations:*** • *Fulfilment of legal reporting and information requests,* • *Conduct of legal audit activities,* • *Conduct of legal processes,* • *Fulfilment of our obligations arising from legislation*
• Parties from which services are procured for communication and promotional Activities	***Based on your explicit consent:*** • *Conducting communication and promotional activities*
• *DGFİN Finansman A.Ş.*	***Based on the legal basis that processing is necessary for the processing of personal data belonging to the parties to a contract, provided that it is directly related to the establishment or performance of a contract.*** *(In the event that you wish to benefit from financing services within the Opet Pay Wallet)* • *Providing the products and services you request from our Company,* • *Conducting our business activities*
• DGpara Ödeme ve Elektronik Para Kuruluşu A.Ş.	***Based on the legal basis that processing is necessary for the processing of personal data belonging to the parties to a contract, provided that it is directly related to the establishment or performance of a contract.*** *(In cases where you wish to benefit from electronic money services)* • *Providing the products and services you request from our Company,* • *Conducting our business activities*

Method of Collection of Personal Data

Your personal data are collected by our Company, within the scope of fulfilling the Purposes, through electronic means via our websites, completion of online membership/communication/application forms,

our internal Company systems, call centre, our mobile applications, SMS and e-mail channels, and through physical means via our retailers, interviews conducted when you contact our Company and printed forms.

Rights of the Data Subject Under Article 11 of the Law

As a data subject, if you submit your requests regarding your rights under Article 11 of the Law to our Company by completing the Data Subject Application Form, which can be accessed at https://www.opet.com.tr/en/information-society-services/protection-of-personal-data. Your request will be concluded free of charge as soon as possible and no later than thirty (30) days, depending on the nature of your request. However, if the process requires an additional cost, the fee specified in the tariff determined by the Personal Data Protection Board may be charged.