

## Boğaziçi Ventures Website Privacy Notice

This Privacy Notice has been prepared by **BV Teknoloji İş Geliştirme Danışmanlık ve Organizasyon Hizmetleri Anonim Şirketi ("BV Teknoloji")**, located at İkitelli Osb. Mah., YTÜ İkitelli Teknopark Sokak, Yıldız Teknik Üniversitesi Teknopark Blok No: 1, İç Kapı No: 2B9, Başakşehir, İstanbul, in order to inform you about the collection methods, processing, use, transfer and destruction of your personal data within the scope of the Personal Data Protection Law No. 6698 ("**PDPL**") within the framework of Article 10 titled "Obligation of Data Controller to Inform" and Article 11 titled "Rights of the Data Subject" regarding the processing of personal data during your use of the services on our website [www.bogaziciventures.com](http://www.bogaziciventures.com) ("**Website**").

BV Teknoloji shall process your personal data within the scope of the personal data processing conditions and purposes specified in the PDPL below:

- in accordance with the law and the rules of fairness,
- by maintaining the accuracy and the most updated version of the personal data you share,
- for specific, explicit and lawful purposes,
- in connection with the purpose for which they will be processed, in a limited and measured manner,
- within the conditions and purposes stipulated in the relevant legislation or necessary for the purpose for which they are processed.

### Collection of Personal Data, Processed Personal Data and Purpose

**Collection.** Your Personal Data is collected directly from you during your visit to the Website. Your data is stored on the BV Teknoloji user database.

### Processing within the Scope of Lawful Reasons.

**Your personal data specified below are processed based on the reasons for lawful processing reasons specified in Article 5/2 of the PDPL.**

**Investor Club.** BV Teknoloji processes your personal data in the table below for the specified purposes, through the specified units and for the specified periods.

Your personal data specified below will be processed in relation to the completion of your membership to Investor Club on the Website, contacting you, introducing products and services and legal transaction processes. The processing of this data is based on the grounds that it is directly related to the establishment or performance of a contract in accordance with subparagraph (c), the fulfilment of legal obligations in accordance with subparagraph (ç), and the establishment, protection or necessity of a right of BV Teknoloji in accordance with subparagraph (e) of Article 5/2 of the PDPL and is not subject to your explicit consent. In this respect, we inform you that you do not have the right to request the deletion of your personal data until the end of the business and the retention periods required by law.

When you become a member of the Investor Club, you must also specify the name and surname of the person who referred you to Investor Club. Pursuant to the PDPL, you must provide the necessary information to the person who referred you in this context and fulfil your obligation to inform the data subject about the processing of their personal data.

Personal Data	Processing Purpose	Data Processor	Retention Period
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Full name	To fulfil legal obligations within the scope of compliance with the relevant legislation in line with the services, to comply with the legislation, to register for participation in online meetings and seminars ( <i>webinars</i> ) to be held, to provide you with the services you request through your membership	Customer Relations, Product Management	It is stored from the date of termination of the service relationship until the end of the 10 (ten) year retention period.
E-mail address, phone number	To register for your participation in online meetings and seminars ( <i>webinars</i> ) to be held in order to communicate about the activities and services offered	Customer Relations, Product Management	It is stored from the date of termination of the service relationship until the end of the 10 (ten) year retention period.
Full name of the person who has referred you	In order to provide you with the services you request through your membership to the Investor Club on the Website	Customer Relations	It is stored from the date of termination of the service relationship until the end of the 2 (two) year retention period.

**Online meetings and seminars to be held via Zoom (*webinar*).** As soon as the meeting starts to be recorded in Zoom meetings and seminars, the participants are asked whether they allow recording. Participation takes place if the participants allow registration. Meeting records are protected by Zoom with advanced encryption standards 256 (Advanced Encryption Standard (AES) 256). The meeting recordings are also shared with United States-based Google Drive, which is located abroad and receives servers and cloud services. Your visual and audio data will be stored for ten (10) years as of the date of the meeting.

### **Processing Based on Your Explicit Consent**

**Newsletter subscription.** [The Website offers the option to share your email address with us for the purpose of newsletter subscription. It is entirely at your choice and discretion whether or not to share this information with us. Failure to share such information will not prevent you from using the Website.

The purpose of requesting this information is to create user database records. The user database is used to manage customer relations.

If you declare your personal information specified herein during the subscription to the newsletter and check the box for the declaration of consent on the Website, you will give BV Teknoloji your explicit consent to process this information for the purposes specified herein. In this case, BV Teknoloji will process your personal data specified in this paragraph based on your explicit consent in accordance with

Article 5/1 of the PDPL. This data is stored from the date of termination of the service relationship until the end of the 10 (ten) year retention period.

**Commercial communication for marketing and advertising purposes.** If you share your name, surname, e-mail address and mobile phone number with us during your newsletter subscription, depending on your preference and your explicit consent, these personal data can be processed for the purposes such as developing the products and services offered by BV Teknoloji, providing new products and services in line with customer satisfaction and needs, creating a user database, conducting market research, surveys or statistical studies to determine the products and services suitable for you, preparing product and service offers, promoting, marketing, advertising and campaign activities, performing satisfaction and efficiency analysis for the products and services offered, sending promotions and gifts to you, communicating over telephone, e-mail, SMS, WhatsApp and similar remote communication tools and/or sending commercial electronic messages and advertising, marketing and commercial communication. The processing of your data to carry out commercial communication activities, including the above-mentioned purposes, is based on your explicit consent in accordance with Article 5/1 of the PDPL. This data is stored from the date of termination of the service relationship until the end of the 10 (ten) year retention period.

**Publication of seminar records on social media platforms.** BV Teknoloji will be able to publish online seminar recordings on social media platforms such as LinkedIn and Youtube for promotional purposes. If you withdraw your consent to the publication of online seminars, BV Teknoloji will anonymize your voice and/or image in the relevant meeting recording by changing it in a way that is not compatible with you. This data is stored until the end of the 10 (ten) year retention period as of the date of the seminar.

You can always withdraw your explicit consent to the processing of your personal data for the purposes set out here. Withdrawing your consent will not affect the lawfulness of the processing based on your consent before such withdrawal. If you do not withdraw your consent, your personal data processed based on your explicit consent will be destroyed in the first destruction period following the specified periods. If you withdraw your approval, it will be destroyed in the first destruction period following the date you withdrew your approval.

**Automated Processing.** Your personal data is processed for statistical purposes, including market analysis assessments, through analog methods.

### **Transfer of Personal Data to Third Parties**

#### **(a) Transfer of Personal Data pursuant to subparagraph 8/2(a) of the PDPL**

BV Teknoloji, can transfer personal data in order to comply with the obligations arising from the law and/or to fulfil its responsibilities in accordance with the service contract, without your consent if it is necessary to fulfil its legal obligation and/or to establish, exercise or protect a right

- (1) limited to the service received only for the fulfilment of obligations and proportionate to this purpose: especially to technical support units within BV Teknoloji and suppliers of BV Teknoloji providing e-mail messaging services, to relevant units required for the performance such as banks, audit firms, lawyers, law offices, financial advisors and/or third party services providers,
- (2) to BV Portföy Yönetimi Anonim Şirketi to make and carry out investment transactions in line with your investment preferences and requests, and
- (3) law enforcement agencies, judicial authorities, relevant ministries and directorates and other public institutions authorized by law.

Data transfer within Turkey is mandatory for the establishment and/or execution of the contract in accordance with paragraph (c) as required by law in accordance with Article 8/2 (a) of the PDPL, in accordance with Article 5/2 (a) of the PDPL, and to fulfil a legal obligation in accordance with paragraph

(d) and It will be limited to cases where it is mandatory for the establishment, use or protection of a right in accordance with paragraph (e).

(b) Transfer of Personal Data Based on Article 8/1 of the PDPL

BV Teknoloji may receive services from third parties to carry out marketing, advertising, analysis, evaluation, and commercial communication activities. In this case, such data transfer may take place based on your explicit consent in accordance with Article 8/1 of the PDPL.

Information about third parties and /or categories of third parties to whom your data is disclosed in Turkey is always open to your information and review.

**Transfer of Personal Data Abroad**

In line with your explicit consent, BV Teknoloji transfers your name, surname, e-mail address, phone number and, if you participate in online meetings, your visual and audio personal data with Google Drive which provides server and cloud services, with its headquarters in the United States abroad.

If the meeting records are published on social media platforms, your personal data may be stored on the foreign servers of the relevant social media platforms. In this context, we recommend that you review the privacy policies of the social media platforms.

These transfers are based on your explicit consent in accordance with Article 9/1 of the PDPL.

BV Teknoloji corporate e-mail network works on Google programs. In this case, all e-mail communications you carry out through the BV Teknoloji workplace e-mail address are stored encrypted on Google's servers abroad. BV Teknoloji will encrypt the attachments containing personal data that you will send in the e-mail attachment.

In addition, BV Teknoloji will contact you through the WhatsApp application with your explicit consent. In this case, all communications carried out through WhatsApp are stored encrypted by WhatsApp on WhatsApp's servers abroad.

Such retention is based on your explicit consent received from you through the Website. The legal basis of your explicit consent is the provision of the PDPL art 9/1. You can always withdraw your explicit consent for the the transfer of your personal data abroad. Withdrawing your consent will not affect the lawfulness of the processing based on your consent before such withdrawal.

**Protection, Retention Period and Destruction of Personal Data**

BV Teknoloji is obliged to take all kinds of physical, technical and administrative measures to ensure an adequate level of security in order to prevent unlawful processing of your personal data, unlawful access to your personal data and to ensure the protection of your personal data and takes these measures to the maximum extent.

Your personal data is collected directly from the data owner by the relevant department specified in the "Data Processor" column in the tables through the website, online forms, e-mails, business cards, telephone and contracts.

BV Teknoloji has prepared separate special information texts (privacy notice) for customers, employees, employee candidates, suppliers and managers. These privacy notices have been delivered to each relevant person group or were opened for access.

**Your rights**

As a data subject, you have the right (a) to request information about whether your personal data is processed and how it is processed in accordance with the applicable legislation (art. 11/(a), (b)), (b) to

learn the purpose of processing and whether it is used in accordance with its purpose (art. 11/c), (c) to know the third parties to whom it is transferred (art. 11/ç), (d) to request correction (art. 11/d), (e) to request the deletion of your personal data in case the reasons for processing disappear (art.7, art. 11/e), (f) to request notification of the relevant transactions to third parties to whom your personal data is transferred in case of correction and deletion (art.11/f), (g) to object to the results obtained as a result of analysis (art 11/g), (h) to request the limitation of processing (art.7), (ı) to request the elimination of damage in case of damage due to unlawful processing (art.11/ğ).

Your above-mentioned rights are limited by law and can probably only be provided by us under certain conditions. (Please refer in particularly to Articles 10 and 13 of the PDPL). You can forward these above-mentioned requests to [iletisim@bogaziciventures.com](mailto:iletisim@bogaziciventures.com). BV Teknoloji will finalize your request as soon as possible and within 30 (thirty) days at the latest from the receipt of the request and the necessary documents.

**Data Controller:** BV Teknoloji İş Geliştirme Danışmanlık ve Organizasyon Hizmetleri Anonim Şirketi

**Central Registration System No:** 0541055019600017

**Address:** İkitelli Osb. Mah., YTU İkitelli Teknopark Sokak, Yıldız Technical University Teknopark Blok No: 1, İç Kapı No: 2B9, Başakşehir, İstanbul

**E-Mail:** [iletisim@bogaziciventures.com](mailto:iletisim@bogaziciventures.com)

**Please contact** the Customer Relations Department via e-mail.

BV Teknoloji may update your personal data at any time upon your request.

To exercise your right to lodge a complaint to the Board (Articles 13, 14, 15 PDPL)

Board: Personal Data Protection Board

Address: Nasuh Akar Mah. Ziyabey Cad. 1407 Sok. No: 4 06520 Balgat-Çankaya/ Ankara

Phone: +90 312 216 5000

Website: [Please](http://www.kvkk.gov.tr/) contact at <http://www.kvkk.gov.tr/>.