

Privacy Notice

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| Data Controller | Türkiye'nin Otomobili Girişim Grubu Sanayi ve Ticaret Anonim Şirketi (“Togg”) |
| Address | Bilişim Vadisi, Muallimköy Mahallesi, Deniz Caddesi, No:143/1 41400 Gebze/Kocaeli-Türkiye |

Introduction

As Togg, we highly value the processing and protection of your personal data. This Privacy Notice is prepared in order to ensure that our users are informed about the personal data processing and transfer during the provision and development of various services within the Togg Website, in accordance with Article 10 of the Personal Data Protection Law No. 6698 (“KVKK”) and the Communiqué on Principles and Procedures to be Followed in Fulfillment of the Obligation to Inform.

In addition to this, you can find detailed information about the processing of your personal data obtained by automated methods via the cookies used on the Togg website, the types of cookies used, and your management preferences regarding these cookies in the **Cookie Policy**.

A. Create Membership/Account

Your personal data regarding **identity information** (name, surname) and **contact information** (e-mail address) will be collected via electronic forms located in the account creation screen. Your personal data will be processed limitedly for the purposes of conducting membership/account creation and verification of contact information, conducting customer relationship management processes, conducting contract processes, conducting business/product/service commitment processes, and conducting communication activities, according to the *“Processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract”* and *“Processing of data is obligatory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject”* legal basis regulated in Article 5 (2) of the KVKK.

Your personal data, which we process on the account creation screen, may be transferred to our suppliers residing in Turkey by taking the necessary technical and administrative measures within the scope of the above-mentioned purposes in accordance with Article 8 of the KVKK. In addition, if necessary, your personal data may be transferred to authorized public institutions under legal regulations in order to fulfill our legal obligations.

B. Creating Personalized Togg Smart Device (Configurator) and Calculators

Your personal data regarding **customer transactions** (vehicle configuration information, savings amount, annual fuel consumption, charging time calculation information) will be collected via information logged in by you on the personalized Togg smart device creation configurator, charging time and savings calculator screens. Your personal data will be processed limitedly for the purposes of conducting products/services marketing processes, conducting contract processes, conducting marketing analysis activities, conducting customer satisfaction activities, conducting customer relationship management processes, and conducting business/product/service commitment processes, according to the *“Processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract”* and *“Processing of data is obligatory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject”* legal basis regulated in Article 5 (2) of the KVKK.

Your personal data, which we process on the personalized Togg smart device creation configurator, charging time and, savings calculator screens, may be transferred to our suppliers residing in Turkey by taking the necessary technical and administrative measures within the scope of the above-mentioned purposes in accordance with Article 8 of the KVKK. In addition, if necessary, your personal data may be transferred to authorized public institutions under legal regulations in order to fulfill our legal obligations.

C. Pre-Order

Your personal data regarding **customer transactions** (invoice information, smart device order information) and **contact information** (address) will be collected via electronic forms and screens during the pre-order creation process. Your personal data will be processed limitedly for the purposes of conducting pre-order creation processes, conducting contract processes, conducting goods/services sales processes, and informing authorized institutions according to the *“Processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract”* and *“It is obligatory for compliance with a legal obligation to which the data controller is subject”* legal basis regulated in Article 5 (2) of the KVKK.

Your personal data, which we process for the pre-order creation process, may be transferred to authorized public institutions under legal regulations in order to fulfill our legal obligations by taking the necessary technical and administrative measures in accordance with Article 8 of the KVKK.

Ç. Togg Wallet

Your personal data regarding **identity information** (name, surname, nationality, T.C. ID number, birthday), **contact information** (phone number), and **customer transactions** (information on balance amount and balance filling sources; spending, cancellation and refund amounts; payments and payment methods/preferences) will be collected via electronic forms and screens during the Togg Wallet creation process. Your personal data will be processed limitedly for the purposes of conducting identity verification procedures, conducting finance and accounting transactions, conducting activities in compliance with legislation, conducting contract processes, conducting payment services processes, conducting goods/services sales processes, and informing authorized institutions according to the *“Processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract”* and *“It is obligatory for compliance with a legal obligation to which the data controller is subject”* legal basis regulated in Article 5 (2) of the KVKK.

Your personal data (identity and customer transaction information) that you shared within the scope of Togg Wallet creation process will be transferred to Turkcell Ödeme ve Elektronik Para Hizmetleri A.Ş. with your explicit consent, which is governed by the Law on Payment and Securities Settlement Systems, Payment Services, and Electronic Money Institutions No. 6493. Besides, your financial information (credit/debit card information), which you input during payment transactions will not be stored in Togg's databases.

D. ToggCare

Your personal data regarding **identity information** (name, surname), **contact information** (e-mail address, phone number), **customer transactions** (request, suggestion and complaint information, message content), and **visual & audio record information** (call center voice recordings) will be collected via contact us form and call center conversations within the scope of ToggCare user call center request management and solution services. Your personal data will be processed limitedly for the purposes of conducting communication activities, following up on requests/complaints, conducting research/investigation activities necessary to carry out support services on the subject of the request, providing information and support services, conducting customer relationship management processes, receiving and assessing recommendations for business process improvement, conducting customer satisfaction activities, and using them as evidence of future disputes, according to the *“Processing of data is obligatory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject”* and *“Data processing is obligatory for the establishment, exercise or protection of any right”* legal basis regulated in Article 5 (2) of the KVKK.

Your personal data may be transferred to our suppliers residing in Turkey by taking the necessary technical and administrative measures within the scope of the above-mentioned purposes in accordance with Article 8 of the KVKK. In addition, if necessary, your personal data may be transferred to authorized public institutions under legal regulations in order to fulfill our legal obligations.

E. Website Support, Development and Information Security

Your data regarding **transaction security information** (IP address, website input-output information, computer screen records) will be collected via information security systems and electronic devices within the scope of carrying out support/development activities and conducting information security processes within the services provided on the Togg Website. Your personal data will be processed limitedly for the purposes of conducting information security processes, conducting access authorisations, conducting audits and ethical activities, conducting storage and archive activities, securing data controller operations, providing information to authorized institutions, and conducting activities in compliance with legislation, according to the *"It is expressly provided for by the laws"*, *"It is obligatory for compliance with a legal obligation to which the data controller is subject"*, and *"Processing of data is obligatory for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject"* legal basis regulated in Article 5 (2) of the KVKK.

Your personal data may be transferred to our suppliers residing in Turkey by taking the necessary technical and administrative measures within the scope of the above-mentioned purposes in accordance with Article 8 of the KVKK. In addition, if necessary, your personal data may be transferred to authorized public institutions under legal regulations in order to fulfill our legal obligations.

F. Legal Processes

In the event of legal processes, your personal data, which is collected during the provision of various services on the Togg Website, will be processed limitedly for the purposes of conducting activities in compliance with legislation, following up and conducting legal transactions, and informing authorized institutions, according to the *"It is obligatory for compliance with a legal obligation to which the data controller is subject"* and *"Data processing is obligatory for the establishment, exercise or protection of any right"* legal basis regulated in Article 5 (2) of the KVKK. Your personal data may be transferred to authorized public institutions under legal regulations in order to fulfill our legal obligations.

Your Rights and Application Methods of Your Personal Data

You have the rights to request regulated in Article 11 of the KVKK:

- to learn whether your personal data are processed or not,
- to demand for information as to if your personal data have been processed,
- to learn the purpose of the processing of your personal data and whether these personal data are used in compliance with the purpose,
- to know the third parties to whom your personal data are transferred in country or abroad,
- to request the rectification of the incomplete or inaccurate data, if any,

- to request the erasure or destruction of your data under the conditions referred to in KVKK,
- to request reporting of the operations carried out to third parties to whom your personal data have been transferred,
- to object to the occurrence of a result against yourself by analyzing the data processed solely through automated systems,
- to claim compensation for the damage arising from the unlawful processing of your personal data.

Regarding your processed personal data, you can send your requests and applications, to togg.kvkk@togg.com.tr by your registered e-mail address in our systems; to turkiyeninotomobili@hs01.kep.tr registered e-mail address (KEP) by your registered e-mail address (KEP) and secure e-signature or mobile signature; or you can send your application in written to Muallimköy Mah. Deniz Cad. No:143/1 Gebze/Kocaeli address. Also, you can decide on other methods to send requests and applications provided from Communique On The Principles And Procedures For The Request To Data Controller.

Your request for your rights regulated under Article 11 of the KVKK will be concluded as soon as possible regarding the nature of the request and thirty days at the latest, free of charge. However, if the transaction also requires an additional cost, you may be charged based on the tariff determined by the Personal Data Protection Board.

Privacy Notice Updates

The Privacy Notice will be updated according to the services and conditions that change within the Togg Website, and regulatory developments. Notifications for the update of the Privacy Notice will be published by Togg on the website.