



PRIVACY NOTICE FOR PERSONAL DATA PROTECTION

(Regarding Investor Relations Processes)

This text has been prepared in accordance with our obligation to inform regarding the personal data we process as Mavi Giyim San. ve Tic. A.Ş. ("**Mavi**"/"**Company**") in our capacity as data controller under the Personal Data Protection Law No. 6698 ("**PDPL**").

This document is intended to inform you about our personal data processing procedures if you are a real person who owns capital market instruments issued by Mavi, you have invested in capital market instruments issued by Mavi, or you are a real person investor or legal entity investor manager or representative who has not invested but is considering investing in these instruments, you are an investment analyst who follows Mavi, or a fund manager, if you participate in general assembly meetings and other similar meetings and discussions on behalf of persons who own capital market instruments issued by Mavi, and/or if you vote.

Our Purposes of Processing Your Personal Data and Our Legal Grounds

Shareholding processes: For the purposes of tracking and maintaining records of individuals holding company shares issued by Mavi, fulfilling registration and similar legal obligations, and complying with Mavi's obligations arising from capital markets legislation, we process your **Identity Information** (name surname, nationality, title, Turkish ID number/citizenship number/tax identification number, signature), **Contact Information** (address, phone number, e-mail address), and **Financial Information** (nominal value, percentage, method, and date of acquisition of capital market instruments held), based on the legal grounds that *"it is necessary for compliance with a legal obligation to which the data controller is subject", "it is expressly provided for by the laws" and "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"*.

Meeting processes: For the purposes of identifying individuals who may attend general assembly and similar meetings, preparing lists of participants, verifying representation authority in case of attendance by proxy, conducting the meetings, counting the votes cast during such meetings, and preparing meeting minutes, we process your **Identity Information** (name surname, nationality, title, Turkish ID number/citizenship number/tax identification number, signature, information contained in identity documents and powers of attorney), **Contact Information** (address, phone number, e-mail address), **Financial Information** (nominal value, percentage, method, and date of acquisition of capital market instruments held) and the voting information you used in meetings, the comments and statements you made, the questions you asked, and the assessments you made, based on the legal grounds that *"it is necessary for compliance with a legal obligation to which the data controller is subject", "it is expressly provided for by the laws" and "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"*.

Investor processes: For the purposes of planning and executing corporate governance and sustainability activities, and maintaining records of individuals who have invested or are considering investing in capital market instruments issued by Mavi, we process your **Identity Information** (name surname, nationality, title, Turkish ID number/citizenship number/tax identification number, signature, information contained in identity documents and powers of attorney) and **Contact Information** (address, phone number, e-mail address) based on the legal grounds that *"it is necessary for compliance with a legal obligation to which the data controller is subject", "it is expressly provided for by the laws" and "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"*.

Organization and event processes: For the purposes of managing organization, event, invitation, meeting, and travel processes, we process your **Identity Information** (name surname, title) and **Contact Information** (e-mail address, phone number) based on the legal grounds that *"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 necessary 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 Processes, Internal Activities and Contractual Obligations

In accordance with the personal data processing processes in the Privacy Notice Regarding Investor Relations Processes, your personal data processed within the scope of each process has been explained in detail above. The legal obligations and auditing processes, legal dispute processes, internal analysis and business development processes, and the detection processes for unlawful transactions, which follow the detailed processes outlined below, may involve the processing of all personal data mentioned in this disclosure document to the extent necessary. However, particularly the personal data that we anticipate might be processed are listed below.

- ☐ **Our legal obligations and audit processes:** For the purposes of fulfilling our obligations arising from the legislation, carrying out mandatory, legal or remedial internal/external audit processes, and carrying out transactions regarding the establishment, performance, termination or cancellation of the contractual relationship arising from the legislation, we process your personal data processed under the headings **"Shareholding Processes, Meeting Processes, Investor Processes, Organization and Event Processes"** and your **Legal Transaction Information** (records regarding the fulfilment of our proof obligations arising from the legislation, litigation and enforcement file information) *-to the extent necessary-; "based on the legal grounds that "it is expressly provided for by the laws", "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", "it is necessary for compliance with a legal obligation to which the data controller is subject", "data processing is necessary for the establishment, exercise or protection of any right" and "processing of data is necessary 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 dispute processes:** For the purposes of exercising our rights to all kinds of lawsuits, statements and objections before official institutions and organisations such as courts, enforcement offices in disputes that may arise and to be presented as evidence in the examination processes, to carry out negotiation and contract processes regarding disputes and to provide you with the necessary information in case you request information from us or apply within the scope of your legal rights, we process your personal data processed under the headings **"Shareholding Processes, Meeting Processes, Investor Processes, Organization and Event Processes"** and your **Legal Transaction Information** (records regarding the fulfilment of our proof obligations arising from the legislation, litigation and enforcement file information) *-to the extent necessary-; based on the legal grounds that "it is necessary for compliance with a legal obligation to which the data controller is subject", "data processing is necessary for the establishment, exercise or protection of any right", and "it is expressly provided for by the laws"*.

- **Internal analysis and business development processes:** For the purposes of reporting, testing and development studies related to internal activities and strategic planning, analysis and business development studies related to operational processes, we process your personal data processed under the headings **“Shareholding Processes, Meeting Processes, Investor Processes, Organization and Event Processes”** and your **Legal Transaction Information** (records regarding the fulfilment of our proof obligations arising from the legislation, litigation and enforcement file information) *-to the extent necessary-; based on the legal ground that "processing of data is necessary 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".*
- **Processes for detection of unlawful transactions:** For the purposes of ensuring the security of you, Mavi, its employees and other third parties against any possible act, crime or behaviour contrary to the legislation, detecting suspicious transactions and unlawful uses, preventing uses contrary to the contract and legislation and ensuring transaction security, we process your personal data processed under the headings **“Shareholding Processes, Meeting Processes, Investor Processes, Organization and Event Processes”** and your **Legal Transaction Information** (records regarding the fulfilment of our proof obligations arising from the legislation, litigation and enforcement file information) *-to the extent necessary-; based on the legal grounds that "it is necessary for compliance with a legal obligation to which the data controller is subject", "processing of data is necessary 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 necessary for the establishment, exercise or protection of any right".*

Our Method of Collecting Your Personal Data

Your personal data, which are processed in accordance with the personal data processing processes in this Privacy Notice Regarding Investor Relations Processes, are collected by the following methods:

- Within the scope of the shareholding processes, meeting processes, investor processes and organization and event processes; by transferring it during the negotiations with you - through partially automated and non-automated means,
- Within the scope of shareholding processes, meeting processes, investor processes and organization and event processes; by recording physical documents -through non-automated means,
- Within the scope of our legal obligations and auditing processes, as well as legal dispute processes; by recording the information/documents related to you received from/accessed through official institutions, organisations and judicial/administrative authorities in physical/electronic media and delivering physical documents by hand, by mail, cargo, notification, e-mail, UETS, KEP, e-notification or UYAP - through non-automated, partially automated, and automated means-,
- Within the scope of our legal obligations and audit processes, legal dispute processes, internal analysis and business development processes, as well as detection of unlawful transactions, shareholding processes, meeting processes, investor processes and organization and event processes; by accessing information stored in our systems and/or archives - through non-automated, partially automated and automated means-,
- Within the scope of organisation and event processes; by taking and recording your photographs and videos - through partially automated means-.

Transfer of Your Personal Data

As Mavi, we only transfer your personal data to third parties in accordance with the purposes specified in this privacy notice and in compliance with Articles 8 and 9 of the PDPL and the By-law on the Procedures and Principles for the Transfer of Personal Data Abroad. In this context, we transfer your personal data to the following third parties within the scope of the purposes and grounds stated below:

- In order to fulfil our legal notification, declaration and audit obligations and our obligations to provide information, documents and other related obligations, to carry out judicial and official correspondence, conduct legal disputes and exercise our legal rights such as litigation, response and objection rights, your information requested by authorised public institutions and organisations from all your personal data processed by Mavi within the framework of this privacy notice to the relevant competent public institutions and organisations, enforcement and bankruptcy directorates, courts, prosecutor's office, law enforcement agencies and other judicial and administrative authorities, in addition to that, for the purposes of obtaining legal support in relation to these processes and initiating and following up legal processes, your personal data that we process -limited to the extent necessary- to the lawyers and law firms from whom we receive legal support services, in accordance with the framework of this privacy notice, within the scope of our legal obligations and audit processes, legal dispute processes and detection of unlawful transactions, based on the legal grounds that *"data processing is necessary for the establishment, exercise or protection of any right"*, *"it is necessary for compliance with a legal obligation to which the data controller is subject"*, and *"it is expressly provided for by the laws"*,
- For the purposes of conducting mandatory, legal or remedial audit processes, your personal data that we process within the scope of our legal obligations and audit processes within the framework of this privacy notice to our suppliers providing financial consultancy, independent audit and tax audit services, from which we receive consultancy and audit services -limited to the extent necessary-, based on the grounds that *"it is necessary for compliance with a legal obligation to which the data controller is subject"*, *"data processing is necessary for the establishment, exercise or protection of any right"*, and *"processing of data is necessary 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"*,
- For the purposes of workforce management and optimisation, business analytics and increasing corporate performance, your personal data that we process within the scope of internal analysis and business development processes to our suppliers from whom we receive consultancy services - limited to the extent necessary - based on the legal ground that *"processing of data is necessary 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"*,
- For the purposes of information system infrastructure and system integration and management, application and software maintenance, support and development, technical documentation, detection, elimination and reporting of performance problems, experiential findings and errors, and product support and services within the scope of cyber security services, all personal data processed by Mavi within the framework of this privacy notice to our suppliers - limited to the extent necessary -, based on the legal ground that *"processing of data is necessary 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"*,

- For the purposes of tracking and detecting suspicious transactions and preventing unlawful transactions, your personal data that we process within the scope of the processes of detection of unlawful transactions within the framework of this privacy notice to the suppliers from which we receive consultancy services when necessary -limited to the extent necessary-, based on the legal grounds that *"data processing is necessary for the establishment, exercise or protection of any right"* and *"processing of data is necessary 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"*.

Transfer Abroad

We transfer your personal data abroad for the following purposes and legal grounds:

- As the servers of our supplier, from which we provide office productivity tools, data processing and cloud-based collaboration services for e-mail, document creation, data editing, presentation development and business reporting purposes, are located abroad, all your personal data processed by Mavi within the framework of this privacy notice to these servers abroad - limited to the extent necessary - based on the legal ground that *"processing of data is necessary 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"*,
- Since the servers of our supplier from whom we receive application and software development services, database and server services, infrastructure, hosting, maintenance and development services and cloud computing solutions services for the execution of database processes and operational processes are located abroad, all your personal data processed by Mavi on these servers within the framework of this privacy notice- limited to the extent necessary - based on the legal ground that *"processing of data is necessary 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"*,
- Since the servers of our suppliers from whom we receive services for the purposes of information system infrastructure and system integration and management, application and software maintenance, support and development, technical documentation, detection, elimination and reporting of performance problems, experiential findings and errors, and product support and services within the scope of cyber security services are located abroad, all personal data processed by Mavi within the framework of this privacy notice - limited to the extent necessary - to these servers; based on the legal ground that *"processing of data is necessary 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"*.

Your Rights Under the PDPL

Regarding your personal data processed by Mavi, you can always forward your requests under Article 11 of the PDPL to the following addresses in writing in accordance with the Communiqué on the Procedures and Principles of Application to the Data Controller, or by using a registered electronic mail (KEP) address, a secure electronic signature, a mobile signature, or your electronic mail address that you have previously notified to Mavi and registered in our system.

Data Controller: Mavi Giyim San. ve Tic. A.Ş.

E-mail: kisiselveriler@mavi.com

KEP Address: mavigiyim.hukuk@hs03.kep.tr

Address: Huzur Mah. Azerbaycan Cad. D Blok No:4D/7 İç Kapı No: 457 Sarıyer/İSTANBUL