

**PRIVACY POLICY STATEMENT OF PAFI SHOES  
TEXTILE MARKETING AND INDUSTRY TRADE  
COMMERCIAL LTD. CO. ON PERSONAL DATA  
PROCESSING**

We would like to inform and notify you on our personal data processing activities pursuant to Article 10 of Law on Personal Data Protection (the Law). Pafi Shoes Textile Marketing and Industry Trade Commercial Ltd. Co. (Pafi Shoes)

**1. Data Controller and Representative**

As per the Law, Pafi Shoes Textile Marketing and Industry Trade Commercial Ltd. Co. (Pafi Shoes), in the capacity of data controller, may process, record, store, update and disclose to third parties, insofar as laws permit and as limited to the purpose of processing, your personal data within the scope of purposes stated below in accordance with laws and good faith.

**2. The Purpose of Processing Your Personal Data**

Pafi Shoes Textile Marketing and Industry Trade Commercial Ltd. Co. (Pafi Shoes) collects personal data of the users who register on the website in such categories as cookies (First name, Last name, Phone number, email address, ID number, tax identification number, tax office, delivery address, billing address, location), payment data, account password, past orders data, other personal data or specially defined personal data.

Collecting Personal Data:

- Pafi Shoes Textile Marketing and Industry Trade Commercial Ltd. Co. (Pafi Shoes) collects your personal data in order to sell products, services and represent advantages on the website, especially in order to fulfill legal obligations
- For the implementation of legal and commercial obligations in the framework of the activities carried out in contracts with third parties or entities related to Pafi Shoes Textile Marketing and Industry Trade Commercial Ltd. Co. (Pafi Shoes), To fulfill obligations of a party to Pafi Shoes Textile Marketing and Industry Trade Commercial Ltd. Co. (Pafi Shoes), arising from agreements with business partners / customers / suppliers (authorized persons or employees), establishment and protection of rights,

implementation of commercial and legal assessment processes, analysis of legal and commercial risks, the process of compliance with legal standards, conducting financial affairs;

- In accordance with the objectives of the necessary work on the specification of the application so that it is recommended to users based on usage habits, needs and whether the products, services and the benefits presented by Pafi Shoes Textile Marketing and Industry Trade Commercial Ltd. Co. (Pafi Shoes) are liked; necessary work on operations during and after sales, individual and / or integrated marketing activities;
- In accordance with the purpose of carrying out the necessary work by the business units of the COMPANY to satisfy users who use the application and get customer satisfaction by the products, services and benefits offered by the party Pafi Shoes Textile Marketing and Industry Trade Commercial Ltd. Co. (Pafi Shoes);
- In accordance with the purpose of determining and implementing the commercial and business strategies of Pafi Shoes Textile Marketing and Industry Trade Commercial Ltd. Co. (Pafi Shoes), for the implementation of those financial transactions, communications, market research and social activities, procurement operations (demand, supply, valuation, ordering, budgeting, contract) that are carried out by Pafi Shoes Textile Marketing and Industry Trade Commercial Ltd. Co. (Pafi Shoes), as well as defining and implementation of commercial and business strategies, internal operations for the management of systems and applications, management of legal operations;
- To promote new services, products within the application, as well as presenting benefits and work on statistics;
- In order to communicate with customers for transferring the necessary information about data processing requirements, the structure of the system, the need to receive information support services, as well as in relation to these services and products;
- To work on accepting orders, making payments, ensuring logistic cooperation with third parties and sending products; recommend products and services that customers might like;

carry out behavioral online advertising and marketing, manage the client's portfolio, measure and

improve the quality of services, feedback, carry out optimization, supervision, risk management and control, promotion, analysis, establishment of interests, assessment, profiling, marketing, sales, advertising, feedback, segmentation;

- In order to consider, evaluate and respond to requests coming from the official authorities or from customers; the data will be processed in accordance with the conditions and objectives specified in Articles 5 and 6 of Law No. 6698.

You can find detailed information about why our company processes your personal data on the website [www.kemalpafi.com](http://www.kemalpafi.com) [www.kemalpafi.com.tr](http://www.kemalpafi.com.tr) in the section Personal Data Protection and Kemal Pafi Privacy Policy

### **3. Transferring Your Personal Data**

Within the scope of purposes stated above, Pafi Shoes may transfer your personal data, within conditions and purposes set out in Articles 8 and 9 of the Law and as limited to the purpose stated above, to its business partners, its stakeholders, authorized public organizations and institutions, private persons, companies providing supplementary services, so as to perform our activities, and independent auditing firms, under legal requirements and limitations.

### **4. Transferring Data Abroad**

Pafi Shoes may transfer your personal data to natural or legal persons residing in countries which the Personal Data Protection Board (the Board) declares as countries which have enough protection and in countries which have no enough protection if data controller in Turkey or abroad guarantees a sufficient protection in writing and procure a permission with regard to relevant data from the Board, with an explicit consent of data subject under the principles set out in Article 4(2) of the Law or, if circumstances set out in Articles 5(2) and 6(3) exist and pursuant to Article 9 of the law, without an explicit consent .

### **5. Personal Data Collection Method and its Legal Ground**

Your personal data is collected automatically or non-automatically in electronic form or otherwise by Pafi Shoes through different departments and channels, in particular through online channels, social media accounts, email addresses, corporate communication, business development, strategy development and marketing (and Customer Relations Management) activities), relying on legal grounds stated above and on the purpose of improving our services stated above or any additional service that may arise later and performing all kinds of our commercial activities. In this context, your personal data may be processed and transferred with your explicit consent under the

principles set out in Article 4(2) of the Law or without your consent if circumstances set out in Articles 5(2) and 6(3) exist.

## **6. Your Rights as Relevant Person Vested by Article 11 of the Law**

As data subject, you can submit your requests concerning your rights to the address, 12 Mesih Paşa Mah. Mesihpaşa Cd. No:16 / A Laleli/İSTANBUL , by filling out data subject application form or to info@kemalpafi.com email address. Pafi Shoes shall conclude your requests at the shortest time, within 30 days at the latest, depending on nature of your request and free of charge. However, you will be charged according to the price tariff specified by the Board, if any cost incurs. You shall have following rights as per Article 11 of the Law.

- a) Learn whether or not your personal data have been processed,
- b) Request information as to processing if your data have been processed,
- c) Learn the purpose of processing of the personal data and whether data are used in accordance with their purpose,
- d) Know the third parties in the country or abroad to whom personal data have been transferred,
- e) Request rectification in case personal data are processed incompletely or inaccurately and,
- f) Request deletion or destruction of personal data under conditions stipulated in Article 7 of the Law,
- g) Request notification of the operations to third parties to whom personal data have been transferred pursuant to e and f above.
- h) Object to occurrence of any result that is to her/his detriment by means of analysis of personal data exclusively through automated systems,
- i) Request compensation for the damages in case the person incurs damages due to unlawful processing of personal data.

## **7. Storing Period of Your Personal Data**

Your personal data, which you share with Pafi Shoes through channels stated in this Privacy Policy, will be processed along with periods required by relevant legislations, in particular by the Law and, in any case, as long as the period during which unless lawful purposes stated above are nullified.

## 8. Request for Updating Your Personal Data

Your personal data, which we collect, should be accurate and complete. For that reason, if there is any change on your personal data, you can inform us about it by submitting your changed personal data to the address, 12 Mesih Paşa Mah. Mesihpaşa Cd. No:16 / A Laleli/ İstanbul or to the email address, [info@kempafi.com](mailto:info@kempafi.com)

This privacy policy statement is produced on 27.01.2020. If there is any change on this statement, its effective date and content will be updated.