

## COOKIE POLICY AND INFORMATION NOTICE

This Cookie Policy and Information Notice ("Policy") sets out the principles regarding the use of cookies on the website [www.mallofistanbul.com.tr](http://www.mallofistanbul.com.tr) ("Website"), operated by Torun Alışveriş Merkezi Yatırım ve Yönetim Anonim Şirketi ("Torunlar"), and includes our statements and explanations as the data controller with respect to: the purpose of data processing, data categories, method and legal basis of data collection, potential recipients and purposes of transfer, data retention periods, and your rights regarding your personal data.

### 1. Which Data Are Processed by Torunlar?

Torunlar is entitled to process the general and special categories of personal data of the data subject with his/her explicit consent, and without explicit consent in cases set forth in Articles 5 and 6 of the Law.

Within this scope, in line with the terms and conditions stated in this Policy, the following types of "personal data" may be processed on the Website:

- Cookie Records

### 2. What Do Cookies Mean?

Cookies are small text files created by a website and stored on your device, containing data in a name-value format. During your use of a website, they store your usage habits and preferences on your browser. Cookies are used to save time and to provide a better internet experience. Cookies created by a website are stored by the web browser you use to access the site, and the information contained in the cookies can only be accessed remotely by the websites presented under the same domain name (e.g., [site.org.tr](http://site.org.tr)), provided that you use the same browser.

Today, cookies have become an important part of web technologies, with their main functions being to remember visitors and their preferences and to recognize devices. Almost all websites use cookies.

### 3. Types of Cookies

- First-party cookies: Created by the website you visit and readable only by that website.
- Third-party cookies: When content is provided via a different domain name (e.g., a video hosted on another platform), these domains may create their own cookies.

### 4. For What Purposes Does Torunlar Process Personal Data Through Cookies?

Cookies are used on our Website mainly for the following purposes:

- To improve the Website, introduce new features, and personalize offered features according to your preferences,
- To ensure the proper functioning of various Website features (e.g., keeping your session open, embedding dynamic content, etc.),
- To collect general, non-personal information on how visitors use the Website (e.g., most clicked links, most visited pages, error message counts), to analyze this information, fix errors, improve the Website, and remove or enhance unpopular pages,
- To determine how you were directed to the Website,
- To generate traffic statistics,

- To provide personalized opportunities such as internet advertising, targeting and retargeting, cross-selling, campaigns, offers, and product/service advertisements, as well as recommendations based on your preferences.
- Cookies are not used for purposes other than those specified in this Policy, and all related activities are carried out in compliance with data protection legislation.

5. Categories of Cookies

Cookie Type	Description
Session Cookies	Valid during your use of the Website and remain active until you close your browser.
Persistent Cookies	Used to remember your preferences on the Website and remain on your device even after closing your browser or restarting your computer.
Mandatory Cookies	Essential for the proper functioning of the Website and to benefit from its features and services.
Functional & Analytical Cookies	Used to remember your preferences, ensure effective Website use, and optimize the Website in line with your requests. These may contain personal data (e.g., cookies that save your language preference).
Tracking Cookies	Created during your visits to our Website and third-party domains. They allow tracking and matching of your click and visit history across domains. Used for user recognition, profiling, targeted advertising, and content customization. These cookies will not be used to identify you personally or to make decisions specific to you.

**Example:**  
Google Analytics uses cookies to analyze how visitors use the Website. Information regarding your Website use (including your IP address) is transmitted to and stored by Google on servers in the USA. Google uses this information to evaluate Website use, compile Website activity reports, and provide other services related to Website activity and internet usage, but will not associate your IP address with any other data held by Google.

## 6. How to Manage Cookies?

Most browsers allow you to view, manage, delete, and block cookies on websites. If you delete all cookies, you will lose all saved preferences (including the cookie that records your choice of not having cookies).

Guides for cookie control on popular browsers:

- Google Chrome
- Mozilla Firefox
- Apple Safari
- Microsoft Internet Explorer
- Adobe Flash Cookies

Additionally, most browsers allow you to:

- View and delete saved cookies,
- Block all cookies,
- Block cookies from specific sites,
- Delete all cookies when closing the browser,
- Block third-party cookies.

## 7. What Measures Are Taken Regarding the Protection and Retention of Personal Data?

Torunlar undertakes to take all necessary technical and administrative measures and to conduct all required audits in a timely and complete manner, in order to ensure the protection of personal data, to prevent unlawful processing, unauthorized access, and data leaks, in line with the Law and this Policy.

Your personal data will only be used within the purposes and scope notified to you, processed with necessary information security measures, and retained for the statutory retention period or, if no such period is provided, for as long as required by the purpose of processing. Upon expiry of this period, your personal data will be deleted, destroyed, or anonymized and removed from Torunlar's data flow.

## 8. To Whom Are Personal Data Transferred?

Your personal data collected through cookies may be shared, for storage or for lawful purposes outlined in this Policy, with:

- Torunlar Gayrimenkul Yatırım Ortaklığı Anonim Şirketi,
- Torun Yapı Sanayi ve Ticaret Anonim Şirketi,
- Zafer Plaza İşletmecilik Anonim Şirketi,
- Torun Kağıt Pazarlama Anonim Şirketi,
- Torunlar Enerji Sanayi ve Ticaret Anonim Şirketi,
- TTA Gayrimenkul Yatırım Geliştirme ve Yönetim Anonim Şirketi,
- Torunlar Gıda Sanayi Ticaret Anonim Şirketi subsidiaries and affiliates,
- Third parties in Turkey and/or abroad with whom Torunlar has a contractual relationship,
- Public authorities legally authorized to request such data.

## 9. How Long Are Personal Data Retained?

Torunlar retains personal data for the duration required by the processing purposes specified in this Policy, and in accordance with the limitation periods stipulated in the Law and other relevant legislation. Once these periods expire, personal data are deleted or destroyed in compliance with the Law.

## 10. What Are Your Rights as a Data Subject?

As a data subject, you may contact Torunlar at any time to obtain information regarding the following:

- Whether your personal data are processed,
- The purpose of processing and whether it is used in line with that purpose,
- The recipients to whom personal data are transferred,
- Requesting correction of incomplete or inaccurate data, requesting deletion of personal data if conditions are met, and requesting notification of such correction/deletion to third parties,
- Objecting to results against you arising from analysis of processed data exclusively via automated systems,
- Requesting compensation for damages incurred due to unlawful processing,
- Requesting deletion or destruction of personal data if the reasons requiring processing no longer exist, even if processed lawfully.

You may submit your applications by sending the Data Subject Application Form via notary, through other methods determined by the Personal Data Protection Authority, or by sending it with a secure electronic signature to [torunavm@hs01.kep.tr](mailto:torunavm@hs01.kep.tr). Your request will be responded to as soon as possible and within thirty (30) days at the latest, in compliance with the Law. However, if the transaction requires an additional cost, Torunlar reserves the right to charge a fee in accordance with the tariff set by the Personal Data Protection Authority.

## 11. Want to Learn More About Cookies and Our Cookie Policy?

Visitors who wish to obtain more detailed information about cookies are recommended to visit [www.aboutcookies.org](http://www.aboutcookies.org).

If you would like more information about our Cookie Policy, you may contact us via the "Contact Us" page or through the communication addresses provided above.

