

CLARIFICATION TEXT ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

This clarification text is prepared by Ceviz Consulting Trade. Ltd. Sti. (“Universal Counselor” or the “Company”) in order to inform the persons, in this context, the clients and their families whose personal data is processed by our company, especially other persons and organizations served, employees, employee candidates, suppliers, visitors about the personal data processing activities carried out in accordance with the Law on the Protection of Personal Data No. 6698 (“KVKK”) and the principles adopted for the protection of personal data.

With our company's Clarification Text:

1. Fulfilling legal obligations arising from KVKK and related legislation,
2. Implementation of the envisaged practices regarding the processing of personal data
3. Creating in-company awareness about the processing of personal data and ensuring its continuity

is targeted and finally, it is envisaged that this will become an important component of our company's holistic perspective management approach aiming at total quality.

This Clarification Text provides our Company with domestic and international education consultancy, within this scope, school/summer school/internship etc. within the framework of Article 10 of the KVKK. Your personal data (name, address, telephone number, e-mail address) submitted and/or collected within the scope of providing the application and requirements and submitting offers about other consultancy services, establishing and/or performing the consultancy contract, conducting the recruitment processes and providing other services It has been prepared in order to ensure that Universal Counselor fulfills its obligation to inform as a "Data Controller" regarding the processing of any information related to an identified or identifiable natural person, such as your address, and your rights regarding these. Universal Counselor has the title of data controller within the scope of KVKK in terms of processing Personal Data. Personal Data can be processed and maintained by Universal Counselor in accordance with the KVKK and the legislation on the protection of personal data.

Purposes of Processing Personal Data

Your personal data, in accordance with Article 4 of the KVKK, by the data controller Universal Counselor;

- Providing the services you request in line with your needs,
- Planning and implementation of commercial business strategies,
- Planning and implementation of marketing/communication activities,



- Consultancy meetings held within our company, consultancy proposals, preparation of related reports and examination of offers submitted for other services,
- Execution of information security processes,
- Execution of finance and accounting works,
- Ensuring the physical security and control of the locations used by our company,
- Coordination and/or execution of domestic-foreign consultancy, consultancy-related works,
- Execution of consultancy processes,
- Execution of contract processes,
- Execution of our company's human resources policies,
- Ensuring contractual requirements and financial reconciliation regarding the products and services offered with our business partners, suppliers or other third parties,
- Giving information to authorized institutions and/or organizations,
- Evaluation of candidates in recruitment processes,
- Giving information about the developments in the world of education consultancy,
- Participating in training, seminars or organizations organized by our company,
- Carrying out the application processes of employee candidates,
- Fulfilling the obligations arising from the employment contract and legislation for the employees,
- Execution of activities in accordance with the legislation,

for processing purposes.

Collection Methods of Personal Data and Legal Reasons

Personal Data can be collected by Universal Counselor through automatic or non-automatic methods, primarily overseas-domestic education consultancy, monitoring these processes, submitting offers for other consultancy services and/or establishing a consultancy contract with Universal Counselor and/or performing the consultancy contract, executing the employment policy. , offices, branches, call center, website, social media channels, mobile applications and similar means verbally, in writing or electronically and in line with the above-mentioned purposes, and in this context, Universal Counselor fulfills its responsibilities arising from contracts and laws completely and accurately. It is collected on the basis of legal reasons. Personal Data collected for these legal reasons can be processed and transferred by Universal Counselor in accordance with the basic principles stipulated by the KVKK, in line with the personal data processing conditions and purposes specified in Articles 5 and 6 of the KVKK, for the purposes specified in this text.

Protection and Processing of Personal Data

Universal Counselor will collect Personal Data only for precise, clear and legal purposes, process it by taking the necessary information security measures, provided that it is not used outside the purposes and scope notified to you, and can store the Personal Data for the periods required by the purposes of processing the Personal Data described in the relevant section above or during legal storage, if any. It will not process the data in a way that is incompatible with the purposes for which they were collected within the framework specified in the KVKK and this Clarification Text, and in the event of the disappearance of the reasons requiring its processing, it will delete or destroy or anonymize it ex officio or upon the

request of the person concerned, without prejudice to the legally obligatory storage conditions.

Transfer of Personal Data

Your Personal Data, located in the country in accordance with Article 8 of the Law, in order to realize the Purposes of Processing Personal Data in this Clarification Text by Universal Counselor and in addition to the data processing purposes stated below,

- Our Company's shareholders, managers and employees, who have the right to monitor, examine and, if necessary, audit the Company's activities,
- To the companies that we have authorized, operating on behalf of our Company, and to our representatives,
- Regulatory and supervisory institutions, public institutions and organizations that are authorized to explicitly request your personal data in the laws they are subject to,
- To business partnerships, banks, financial institutions and other real or legal persons within the scope of the stated purposes,
- To third parties and organizations from which we receive consultancy services, including tax and law

can be transferred. In addition, your personal data, pursuant to Article 9 of the KVKK, by Universal Counselor;

- To universities and educational institutions abroad,
- FAFSA, CSS, UCAS, IDOC, CommonApp, CoalitionApp etc., which are open to access and information from universities and educational institutions abroad. central data repositories,
- To third parties/organizations that directly or indirectly receive or plan to receive consultancy, support or legal services abroad,
- Third parties/organizations (including cloud computing service providers that may have servers in various countries), legally authorized institutions and organizations, from which they receive or plan to receive consultancy support or service in other matters,

may be transferred within the framework of the specified personal data processing conditions and purposes.

All necessary technical and administrative measures are taken by Universal Counselor in case your personal data is transferred to the country or abroad.

Data Owner's Rights

Pursuant to Article 11 of the KVKK, it is regulated that among the rights of the Personal Data owner, there is also the right to "request information". In this context, Universal Counselor provides the necessary information in case the personal data owner requests information, and with this Clarification Text, Universal Counselor informs the data owner about how the right to request information will be exercised and how the issues related to the information request will be evaluated.

Personal data owners are listed below in accordance with KVKK;

- Learning whether their Personal Data is processed or not,
- If Personal Data has been processed, requesting information about it,
- Learning the purpose of processing Personal Data and whether they are used in accordance with its purpose,
- Knowing the third parties to whom Personal Data is transferred in the country or abroad,
- Requesting correction of Personal Data if it is incomplete or incorrectly processed,
- To request the deletion/destruction of Personal Data within the framework of the conditions stipulated in Article 7 of the KVKK and to notify the third parties to which the Personal Data has been transferred,
- Objecting to the emergence of a result against them by analyzing the processed data exclusively through automated systems,
- Requesting the removal of their Personal Data in case of loss due to the processing of their personal data in violation of the KVKK

they have rights.

Application of the Data Owner

You can send your requests regarding your rights mentioned above to info@universalcounselor.com or in writing to the address below, using the attached form. In the event that the conclusion of the said requests requires a separate cost, Universal Counselor may charge the applicant for the fee in the tariff determined by the Personal Data Protection Board. Your applications submitted to us will be answered within thirty days from the date of receipt of your request in accordance with the second paragraph of Article 13 of the KVKK. Our answers will be delivered to you in writing or electronically in accordance with the provisions of the same article.

Universal Counselor

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Phone: +90 (212) 353-6606, **Mobile:** +90 (554) 153-6606, **Web:** universalcounselor.com

KVKK RELATED PERSON APPLICATION FORM

A. Information on the Applicant

Name-Surname	:	
TC ID No	:	
Phone Number	:	
E-mail	:	
Adress	:	
Please indicate your relationship with our company (such as Client-Parent, business partner, employee candidate, employee, third-party company employee, shareholder).	:	

B. Information on the Choice of the Right to be Used by the Personal Data Owner (Please tick the box(s) next to the expression appropriate to your request)

	I want to know whether your company processes personal data about me.
	If your company processes personal data about me, I request information about these data processing activities.
	If your company processes personal data about me, I would like to know the purpose of processing and whether they are used in accordance with the purpose of processing.
	If my personal data is transferred to third parties at home or abroad, I would like to know these third parties.
	I think that my personal data is incomplete or incorrectly processed and I would like them to be corrected.
	Although my personal data has been processed in accordance with the provisions of the law and other relevant laws, I want my personal data to be deleted.
	I want my personal data, which I think is incomplete and wrongly processed, to be corrected by the third parties to whom it was transferred.
	I want my personal data, which I requested to be deleted, to be deleted by the transferred third parties.
	I believe that my personal data processed by your company is analyzed exclusively through automated systems, and as a result of this analysis, there is a result against me. I object to this conclusion.

C. Explanation About the Request (Please specify your request under the KVK Law and the personal data subject to your request in detail.)

D. Annexes (Please indicate if there is any document you want to show as a basis for your application)

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E. Please choose the method of notifying you of the response we will give to your application.

- I want it sent to my address.
- I want it to be sent to my e-mail address (If you choose the e-mail method, we will be able to respond to you faster.)
- I want to receive it by hand (In case of receipt by proxy, a notarized power of attorney or authorization document is required)

F. Statement by the Applicant

This application form has been prepared in order to determine your relationship with our Company and to fully determine your personal data processed by our Company, if any, so that your relevant application can be answered accurately and in a legal time. In order to eliminate the legal risks that may arise from illegal and unfair data sharing, and especially to ensure the security of your personal data, our Company reserves the right to request additional documents and information (copy of identity card or driver's license, etc.) for identification and authorization. In the event that the

information regarding your requests you submit within the scope of the form is not correct and up-to-date, or an unauthorized application is made, our Company does not accept any liability for such false information or requests arising from unauthorized applications. All responsibility arising from unlawful, misleading or false applications lies with you.

Personal Data Owner / Person Applying on Behalf of Someone Else^[1]

Name Surname :

Application Date :

Signature :

^[1] If you are applying on behalf of someone else, please send the documents showing that you are authorized to apply (such as a document showing that you are the parent/guardian of the personal data owner, power of attorney) in the annex of the application. In order for these documents to be considered valid, they must be issued or approved by the competent authorities.