



PRIVACY POLICY

1. Introduction

1.1. Purpose and Scope of the Policy

LEAP Teknoloji Yatirimlari Anonim Sirketi (hereinafter referred to as “**LEAP**” or “**Company**”) aims to determine the principles to be followed in fulfilling obligations regarding the protection and processing of personal data through this Privacy Policy (“**Policy**”) as “**Data Controller**”. Therefore, not limited to those listed; we perform the processing, storage and transfer of data regarding our employees, LEAP Investment Platform members, our visitors, our users visiting our website, in short, all personal data we obtain during our activities, in accordance with the Policy.

This Policy has been published by LEAP on its website and presented to the public. LEAP reserves the right to make changes in the Policy in line with the legal regulations.

2. Classification of Personal Data, Collection Methods of Personal Data and Legal Reasons for Processing, Purposes of Processing Personal Data

2.1. Classification of Personal Data

Your personal data categorized below by LEAP are processed in accordance with the personal data processing conditions in the Law and relevant legislation:

- a. **Identity Information:** All information regarding the identity of the person in documents such as driver's license, identity card, residence, passport, marriage certificate.
- b. **Contact Information:** Information for contacting the data owner such as phone number, address, e-mail
- c. **Family Members and Close Information:** Clearly belonging to an identified or identifiable natural person and included in the data recording system; Information about the family members and relatives of the personal data owner regarding the products and services we offer or in order to protect the legal interests of the Institution and the data owner.
- d. **Data on Education, Work and Professional Life:** All information about people's education and working life
- e. **Payment Information:** Payment information and records required for the service to be obtained from LEAP or for the sale of products offered for sale.
- f. **Customer Information:** Clearly belonging to an identified or identifiable natural person, processed partially or completely automatically or non-automatically as a part of the data recording system; information obtained and produced about the person concerned as a result of our commercial activities and the operations carried out by our business units in this context.

- g. Customer Transaction Information:** Clearly belonging to an identified or identifiable natural person and included in the data recording system; information such as records for the use of our products and services, and the customer's instructions and requests for the use of products and services
- h. Physical Space Security Information:** Personal data regarding records and documents such as camera recordings taken at the entrance to the physical space and during the stay in the physical space
- i. Transaction Security Information:** Clearly belonging to a specific or identifiable natural person and included in the data recording system; Personal data processed to ensure our technical, administrative, legal and commercial security while carrying out our commercial activities
- j. Risk Management Information:** Clearly belonging to an identified or identifiable natural person and included in the data recording system; In order to manage our commercial, technical and administrative risks, personal data processed through the methods used in accordance with the generally accepted legal, commercial practice and good faith in these fields
- k. Financial Information:** Personal data processed for information, documents and records showing all kinds of financial results created according to the type of legal relationship our company has established with the personal data owner.
- l. Employee Candidate Information:** Processed personal data of individuals who have applied to be an employee of our company or who have been evaluated as an employee candidate in line with the human resources needs of our Company in accordance with the rules of practice and honesty, or who have a working relationship with our Company.
- m. Employee Transaction Information:** Processed partially or completely automatically or non-automatically as a part of the data recording system, clearly belonging to an identified or identifiable natural person; Personal data processed for all kinds of work-related transactions of our employees or real persons who have a working relationship with the Institution
- n. Personal Information:** It is clear that it belongs to an identified or identifiable natural person, is processed partially or completely automatically or non-automatically as a part of the data recording system; All kinds of personal data processed for the purpose of obtaining the information that will form the basis of the personal rights of our employees or real persons who are in a working relationship with the Institution.
- o. Legal Action and Compliance Information:** Processed partially or completely automatically or non-automatically as a part of the data recording system within the scope of determination, follow-up and performance of our legal receivables and rights, and compliance with our legal obligations and our Company's policies; Personal data processed within the scope of our company's compliance with legal obligations and policies
- p. Audit and Inspection Information:** Personal data processed within the scope of our company's legal obligations and compliance with company policies
- q. Special Qualified Data:** Data about the race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, disguise and dress, membership to



associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data, special quality personal data

- r. **Marketing Information:** Clearly belonging to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; Personal data processed for the marketing of our products and services by customizing them in line with the usage habits, tastes and needs of the personal data owner, and the reports and evaluations created as a result of these processing results
- s. **Reading Information:** Access, read/click information, IP address, user name, unsubscrition – reporting information as spam e-mails of e-mails sent to the person.
- t. **Request/Complaint Management Information:** Personal data regarding the receipt and evaluation of any request or complaint directed to our company
- u. **Cookie Data:** All kinds of personal data such as browsing time and details, location data, user name and password, obtained as a result of monitoring the activities of users in the digital environment, will be classified under this category. Pop-up warnings shown to users, similar data on website usage

2.2. Collection Methods of Personal Data and Legal Reasons for Processing

Your personal data is collected by LEAP in physical or electronic environment upon your declarations and within the framework of the relationship between LEAP and you.

Although your personal data may vary depending on the service provided by our Company and the commercial activities of our Company; automatic or non-automatic methods, LEAP affiliates, website, social media channels, call center, mobile applications, software used to carry out activities within the company, camera records, all contracts/information forms regarding transactions issued with your approval and/or your signature, and other documents, card pass system, CCTV, SMS, e-mail, cookies and similar tracking technologies, fax, postal, cargo or courier services, visitor registration processes to the extent permitted and within the limits drawn by the relevant legislation and agreements, in cases where legally required. It is collected through the databases of various institutions and organizations with your consent. Your personal data may be processed when you use our call centers or website to use company services, when you visit our company or our website, and when you attend trainings, seminars or organizations organized by our company.

LEAP collects and stores your personal data within the permitted legal period which includes written/digital applications, website, during internet connection in the building, social media, call center, e-mail, digital or printed survey, printed form, scanning of judicial records, SSI (social security insurance) records, where LEAP communicates with you or in the future. It is collected orally, in written or electronical method through the channels through which it can pass and systems such as LEAP indoor and outdoor closed circuit camera monitoring system and stored for the legal period.



In the LEAP recruitment process, applicants should send their CVs to the e-mail address of the LEAP Human Resources Unit with their explicit consent, answer the questions asked during the interview with their own consent, or use human resources software programs (Kariyer.net, LinkedIn) that provide advertisement publishing and candidate pool services. etc.) personal data of the applicants are obtained through the CV display methods offered.

The following methods are the main ones;

- Via LEAP's websites and applications, in case of explicit consent of the data owners using the website of LEAP or in the presence of one of the conditions where personal data can be processed without the need for explicit consent,
- LEAP site,
- Forms prepared by LEAP,
- Communications via e-mails sent by data owners and over the phone with data owners,
- Social media (such as Facebook, Twitter, Instagram, LinkedIn) shares,
- Commercial electronic message approvals, SMS, e-mail,
- Sending CVs for purposes such as establishing a relationship with LEAP, applying for a job, etc. sharing personal data in ways,
- CCTV,
- Visitor records,
- Applications made to competitions, raffles and support programs organized by LEAP,
- Due to the fact that LEAP has a business relationship and being the employees of the institutions, through these institutions,
- Business card sharing,
- Cookies and Similar Tracking Technologies,

etc. Personal data can be collected verbally, in writing or electronically, in a physical or virtual environment, from people who have shared their personal data with LEAP, whether face-to-face or remotely.

In this context, your personal data;

- 2.2.1.** Carrying out activities in line with the stated objectives and study subjects,
- 2.2.2.** Execution of LEAP Investor Platform organization and management processes,
- 2.2.3.** Ensuring communication with LEAP Investor Platform members,
- 2.2.4.** Giving information about the promotion of the LEAP Investor Platform and the events held,
- 2.2.5.** Determination and implementation of LEAP Investor Platform activities and services, execution of service policies,
- 2.2.6.** Informing the members of the LEAP Investor Platform,
- 2.2.7.** For the purposes of ensuring the security and supervision of all facilities belonging to LEAP, copying/backing up to prevent data loss, provided that it does



not harm the fundamental rights and freedoms of our members (or real person representatives of our legal entity members) as per article 5/2(f) of the KVKK, It is processed within the scope of legal reasons that data processing is mandatory for LEAP's legitimate interests, in addition, it is responsible for the establishment, exercise or protection of the right in accordance with Article 5/2(e) of the KVKK in order to carry out legal processes regarding the members.

LEAP also supports Google Analytics, Facebook etc. through the website. LEAP can obtain anonymous analysis information through them. In the use of this information, the personal information sharing consent given by the website users to the relevant third parties is essential.

LEAP reserves the right to add new methods and channels to the personal data collection methods and channels listed here, to abandon the existing ones and to make changes in the Policy text, such changes will be announced by updating the Policy. For this reason, we recommend that you regularly check and follow our website where the Policy is published.

Your personal data collected through these methods are processed within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the Law No. 6698.

The legal reasons for obtaining personal data of data owners vary according to each situation. These are briefly as listed in Article 5 of the Law;

2.2.1. In cases where **the personal data owner has express consent** and other data processing conditions are not available, LEAP can process the personal data of the data owner with the free will of the data owner, having sufficient information about the personal data processing activity, leaving no room for hesitation, and only if he gives his consent limited to that transaction.

2.2.2. Personal data may be processed by LEAP without the explicit consent of the data owner, if **the personal data processing activity is expressly stipulated in the law**. In this case, LEAP will process personal data within the framework of the relevant legal regulation.

2.2.3. In case the **explicit consent of the data owner cannot be obtained due to the actual impossibility and if the personal data processing is mandatory**, the personal data belonging to the data owner, whose consent cannot be declared by LEAP or whose consent cannot be validated, may be required to be processed in order to protect the life or physical integrity of the data owner or a third person.

2.2.4. In the event that **the personal data processing activity is directly related to the establishment or performance of a contract**, personal data processing will be carried out if it is necessary to process the personal data of the parties to the contract established or already signed between the data owner and LEAP.



2.2.5. In case it is **necessary to carry out personal data processing activities in order to fulfill the legal obligation of the data controller**, LEAP processes personal data in order to fulfill its legal obligations under the applicable legislation.

2.2.6. The fact that the **data owner has made his personal data public**, has been disclosed to the public in any way by the data owner, the disclosed personal data may be processed by LEAP for the purpose of making it public, even without the explicit consent of the data owners.

2.2.7. In the event that **personal data processing is mandatory for the establishment, exercise or protection of a right**, LEAP will be able to process the personal data of the data subject without the explicit consent of the data subjects.

2.2.8. Provided that **it does not harm the fundamental rights and freedoms of the data owner**, if data processing is necessary for the legitimate interests of the data controller, personal data may be processed by LEAP, provided that the balance of interests of the LEAP and the data owner is observed. In this context, in the processing of data based on legitimate interest, LEAP primarily determines the legitimate interest to be obtained as a result of the processing activity. It evaluates the possible impact of the processing of personal data on the rights and freedoms of the data owner, and if it considers that the balance is not disturbed, it performs the processing.

LEAP can process sensitive personal data if the data owner gives express consent or if it is expressly stipulated in the law, by ensuring that additional measures determined by the Personal Data Protection Board are taken.

2.3. Purposes of Processing Personal Data

Within the framework of the personal data processing conditions specified in Article 5 and 6 of the Law; Your personal data and sensitive personal data may be processed by LEAP for the following purposes in accordance with the personal data processing conditions in the Law and relevant legislation:

Your collected personal data,

- 2.3.1.** Carrying out activities in line with the stated objectives and study subjects,
- 2.3.2.** Organizing, managing and conducting investment meetings, investment presentations, events and related processes,
- 2.3.3.** Ensuring communication between the LEAP Investment Platform and its members regarding membership rights and obligations and fulfilling related rights and obligations,
- 2.3.4.** Giving information about the promotion of the LEAP Investment Platform and the events held,

- 2.3.5.** Determining and implementing the activities and services of the LEAP Investment Platform, executing service policies,
- 2.3.6.** Strengthening communication and cooperation,
- 2.3.7.** Managing the legal processes of the LEAP Investment Platform,
- 2.3.8.** Establishing cooperation with LEAP in order to develop the business capacity and R&D ecosystem between legal and real persons,
- 2.3.9.** Financial operations, communication, market research and social responsibility activities carried out by LEAP, purchasing operations (demand, offer, evaluation, order, budgeting, contract), determination of LEAP commercial and business strategies and implementation,
- 2.3.10.** Publishing the photo/video recording of the event organized within LEAP on ANKARA TEKMER and/or LEAP printed/visual media, social media accounts, image sharing platforms and website,
- 2.3.11.** To carry out the necessary work by our business units in order to benefit the relevant people from the products and services offered by LEAP; customizing and recommending the products and services offered by our company according to the tastes, usage habits and needs of the persons concerned; ensuring the legal and commercial security of our company and those who have a business relationship with our company; to carry out our commercial activities for the purposes of determining and implementing our company's commercial and business strategies,
- 2.3.12.** Within the framework of the contracts made or the activities carried out with the third real or legal persons who are in a business relationship with LEAP; performance of the obligations arising from the contracts made by LEAP with the business partner/customer/suppliers (authorized or employees) for the realization of legal and commercial obligations, establishment of rights, protection of rights, commercial and legal assessment processes, legal and commercial risk analysis, legal compliance process and financial running the business,
- 2.3.13.** In line with the purpose of executing LEAP Human Resources policies; Occupational health and safety in the context of the legislation related to the completion of the personal data of the personnel working within LEAP, the registration of the Social Security Institution (SGK) and the mandatory documents to be in the personnel file of the persons within the scope of the current Labor Law No. 4857 and the Occupational Health and Safety Law numbered 6331. Fulfilling obligations within the framework of security and taking necessary measures,
- 2.3.14.** Sharing your personal data with the organizations that organize the event and are the event stakeholders regarding the events you attend, realizing the purposes mentioned here by taking the necessary security and legal measures,
- 2.3.15.** LEAP, to communicate for interview purposes during the recruitment process and to determine whether the qualifications and experiences of the person and the vacant position to be recruited are compatible during the interview,
- 2.3.16.** Planning and execution of activities necessary for recommending and promoting your personal data, resumes, educational information and services provided by



the Company to the relevant persons and companies by customizing them according to the tastes, usage habits and needs of the persons concerned,

- 2.3.17.** Making necessary studies by business units in order to benefit from the products and services offered by the company (listing, verification, analysis, survey and evaluations, production of statistical and scientific information, analysis of the way you use our website and other communication channels, and making customizations for you) and personal data are processed for the purposes of conducting relevant business processes.

3. Transfer of Personal Data

LEAP will be able to transfer your personal data to the following persons in the following ways and situations, in accordance with the basic principles stipulated by the KVKK and in accordance with the conditions specified in the 8th and 9th articles of the KVKK:

- 3.1.** Your personal data will be shared with relevant institutions and organizations in order to fulfill legal obligations, and in a limited manner, if the personal data is required to be shared under any legislation in force during the period of processing or in order to fulfill an obligation stipulated under the legislation.
- 3.2.** In order to provide various activities and services such as general assembly meetings, investment meetings, summits, agenda meetings, and other member meetings organized within the body of LEAP, LEAP can work with third party organization companies. The name and surname information of the persons who will attend the event will be shared with the organization firm authorized by LEAP in terms of certain activities and which will act as a data processor for that particular business, provided that it does not harm your fundamental rights and freedoms, within the scope of the legitimate interest of LEAP, which is the data controller.
- 3.3.** Although no particular data is transferred to the relevant companies, we work with third party information technology companies in order to provide information technology services within LEAP, and for the legitimate interests of LEAP, provided that it does not harm the fundamental rights and freedoms of our members (or real person representatives of our legal entity members). Based on the legal reason that data processing is mandatory, within the scope of providing these services, these companies may access the servers and programs used by LEAP from time to time in order to provide technical support, and indirectly in this context, the data under these programs. However, it is not possible for these companies to transfer the data to their own systems or to process and store this data by themselves.
- 3.4.** In case of any dispute regarding the rights or obligations of the member or the membership in the LEAP Investment Platform, your Personal Data will be shared



with LEAP's lawyers, consultants and relevant judicial authorities and enforcement authorities and the data controller LEAP's rights to the extent and limited to the relevant dispute.

- 3.5.** If it is necessary, your personal data may be shared within the scope of the legitimate interest of LEAP, which is the data controller, provided that it is necessary for its use or protection and does not harm your fundamental rights and freedoms. Your personal data may be shared by LEAP to fulfill the above-mentioned data processing purposes and activities, the establishment of the rights of LEAP and third parties, such as consultants, financial advisors, auditors, from whom LEAP receives services, support and consultancy, and limited only to these.
- 3.6.** LEAP is limited to the processes of maintaining in-company activities and determining commercial strategies, organizing events, planning investment meetings and presentation organizations, organizing and executing investment processes planned for entrepreneurs and start-up companies operating within Ankara Tekmer Technology Development Center (“**ANKARA TEKMER**”). Your personal data appropriate for the purpose of the activity can be shared with the entrepreneur, general manager and assistant, project manager, accountant, lawyer and consultants of ANKARA TEKMER.

In addition to the ones listed above, your personal data, which will be requested by the authorities, if necessary for the fulfillment of the legal obligations under the legislation in force at the date of the relevant transaction or request, or in case of such a request from official institutions, may be contacted with the relevant institutions and organizations or judicial bodies, legal or legal.

4. Third Parties and Purposes of Transfer of Personal Data by Our Company

Our company notifies the personal data owner of the groups of persons to whom personal data is transferred in accordance with Article 10 of the Law. In accordance with Articles 8 and 9 of the Law, our company will be able to transfer the collected personal data to the persons and institutions listed below:

- a.** To business partners and stakeholders,
- b.** To its suppliers,
- c.** To their Advisors/Mentors,
- d.** To its shareholders,
- e.** Company officials,
- f.** Legally Authorized public institutions and organizations,
- g.** Legally authorized private legal persons.



The scope of the above-mentioned persons to whom the transfer is made and the data transfer purposes are stated below.

- a. **Business Partner:** It defines the real and legal person parties with which it cooperates and establishes business partnerships within the scope of its activities and projects. Limited data transfer is carried out in order to ensure the fulfillment of the purposes of the establishment of the business partnership.
- b. **Supplier:** Identifies the parties providing services to LEAP. Data transfer is carried out on a limited basis in order to ensure that the services that are outsourced by our company from the supplier and that are necessary to carry out the commercial activities that are provided to our Company.
- c. **Consultant:** Defines the parties that provide consultancy to LEAP or to specific or identifiable individuals or entrepreneurs and companies within the LEAP. The consultancy services required to carry out the activities of LEAP are within the scope of LEAP. Data transfer is carried out on a limited basis in order to ensure that it is properly presented to certain or identifiable persons or entrepreneurs and companies.
- d. **Shareholders:** It is defined as our shareholders who are authorized to design strategies and audit activities regarding our Company's commercial activities in accordance with the provisions of the relevant legislation. In accordance with the provisions of the relevant legislation, data transfer is limited to the design of strategies regarding the commercial activities of our Company and for audit purposes.
- e. **Company officials:** These are the chairman and members of the LEAP's board of directors, the members of the Executive Board, the Selection Committee and authorized real persons in other boards within LEAP. Limited data transfer is made for the purpose of designing strategies regarding the activities of LEAP, ensuring the highest level of management and auditing.
- f. **Legally Authorized Public Legal Entities:** Public Institutions and Organizations are entities that are authorized to receive information and documents from our Company in accordance with the provisions of the relevant legislation. Data transfer is limited to the purpose requested by the relevant public institutions and organizations within the scope of their legal authority.
- g. **Legally Authorized Private Legal Persons:** These are defined as our shareholders who are authorized to design strategies and audit activities regarding our Company's commercial activities in accordance with the provisions of the relevant legislation. Data transfer is limited to the purpose requested by the relevant private legal persons within the scope of their legal authority.

4. Clarification of Data Owners and Rights of Data Owners

According to Article 10 of the Law, before the processing of personal data or at the latest at the time of processing, data owners must be informed about the processing of personal data. Pursuant to the relevant article; in the capacity of data controller, the necessary internal structure has been established in order to ensure that data owners are informed in every situation where personal data processing activities are carried out by LEAP.



The rights you have as a data owner pursuant to Article 11 of the Law:

- a.** Learning whether your personal data is processed or not,
- b.** If your personal data has been processed, requesting information about it,
- c.** Learning the purpose of processing your personal data and whether they are used in accordance with the purpose,
- d.** Knowing the third parties to whom your personal data is transferred, in the country or abroad,
- e.** Requesting correction of your personal data in case of incomplete or incorrect processing and requesting notification of the transaction made within this scope to the third parties to whom your personal data has been transferred,
- f.** Requesting the deletion or destruction of personal data in the event that the reasons requiring its processing cease to exist despite the fact that it has been processed in accordance with the Law and other relevant law provisions, and requesting the notification of the transaction made within this scope to the third parties to whom your personal data has been transferred,
- g.** Objecting to this if a result arises against you by analyzing the processed data exclusively through automated systems,
- h.** Requesting the compensation of the damage in case you suffer damage due to unlawful processing of your personal data.

Applications will be made by one of the following methods, together with documents that will identify the relevant data owner:

- Fill in the form and send a signed copy of the form by hand, through a notary public or by registered letter with return receipt [Balgat, Mevlana Blv. No: 221 / 104, 06520 Çankaya/Ankara],
- Sending the form via registered e-mail to info@leapinvestment.co,
- Following a method prescribed by the Personal Data Protection Board.

Depending on the nature of your request, your applications will be concluded free of charge as soon as possible and within (30) thirty days at the latest; however, if the transaction requires an additional cost, you may be charged a fee according to the tariff to be determined by the Personal Data Protection Board.

During the evaluation of the applications, LEAP first determines whether the person making the request is the real beneficiary. However, when it deems necessary, LEAP may request detailed and additional information in order to better understand the demand.

Responses to data subject applications are notified by LEAP in writing or electronically. If the application is rejected, the reasons for the rejection will be explained to the data owner with justification.



As the data will be outside the scope of the Law in the following cases within the framework of the "exceptions" provision of Article 28 of the Law, the requests of the data owners will not be processed in terms of these data:

The provisions of the Law shall not be applied in the following cases where:

- a. personal data are processed by natural persons within the scope of purely personal activities of the data subject or of family members living together with him/her in the same dwelling provided that it is not to be disclosed to third parties and the obligations about data security is to be complied with.
- b. personal data are processed for official statistics and provided that they are being anonymized for the purposes for such as research, planning and statistics.
- c. personal data are processed with artistic, historical, literary or scientific purposes, or within the scope of freedom of expression provided that national defence, national security, public security, public order, economic security, right to privacy or personal rights are not violated or the process doesn't constitute a crime.
- d. personal data are processed within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations duly authorised and assigned by law to maintain national defence, national security, public security, public order or economic security.
- e. personal data are processed by judicial authorities or execution authorities with regard to investigation, prosecution, judicial or execution proceedings.

Provided that it is in compliance with and proportionate to the purpose and fundamental principles of this Law, Article 10 regarding the data controller's obligation to inform, Article 11 regarding the rights of the data subject, excluding the right to claim compensation, and Article 16 regarding the obligation to register with the Data Controllers' Registry shall not be applied in the following cases where personal data processing:

- a. is necessary for the prevention of committing a crime or for crime investigation.
- b. is carried out on the data which are made public by the data subject himself/herself.
- c. is necessary for performance of supervision or regulatory duties and disciplinary investigation and prosecution to be carried out by the assigned and authorised public institutions and organizations and by public professional organizations, in accordance with the power conferred on them by the law,
- d. is necessary for protection economic and financial interests of State related to budget, tax and financial matters.

In such cases, the above-mentioned rights regarding the data cannot be used.

5. Storage and Disposal of Personal Data

Personal data will be retained for the periods stipulated by the relevant legislation. If there are no periods stipulated in the legislation, LEAP will keep personal data for the necessary



periods for each data processing activity, taking into account the purpose of the data processing activity.

Although it has been processed in accordance with the law in accordance with Article 7 of the Law, in the event that the reasons requiring it to be processed disappear; personal data is deleted, destroyed or anonymized by LEAP ex officio or in accordance with the guidelines published by the Board upon the request of the data owner.

6. Other Sites/Third Parties and Their Privacy Policies

LEAP is not responsible for the privacy and personal data policy practices or contents of other websites linked from this website, or the privacy and personal data policies and practices of third parties. Regarding these, we strongly recommend that you review the privacy and personal data policies of the relevant third party.

7. Specific Personal Data Processing Activities within the Company

In order to ensure security, our company carries out personal data processing activities for monitoring the entrance and exit of guests with security cameras in our company's buildings and facilities.

Personal data processing activities carried out by our company at the entrance of the building and within the facility are carried out in accordance with the Constitution, KVKK and other relevant legislation.

7.2. Camera Monitoring Activity at LEAP Building Entrances and Inside

Our company, within the scope of monitoring with security cameras; It aims to increase the quality of the service provided, ensure its reliability, ensure the safety of the company, customers and other people, and protect the interests of the customers regarding the service they receive.

The camera monitoring activity carried out by our company is carried out in accordance with the Law on Private Security Services and the relevant legislation.

Our company carries out surveillance activities with security cameras in order to ensure security in its buildings and facilities, for the purposes stipulated in the laws and in accordance with the personal data processing conditions listed in the KVKK.

Our company informs the personal data owner in accordance with Article 10 of the Law. For the camera monitoring activity by our company; This Policy is published on our company's website and a notification letter stating that monitoring will be carried out is posted at the entrances of the areas where monitoring is performed.



Our company processes personal data in a limited and measured manner in connection with the purpose for which they are processed, in accordance with Article 4 of the Law. The purpose of maintaining the video camera monitoring activity by our company is limited to the purposes listed in this Policy.

Necessary technical and administrative measures are taken by our company in order to ensure the security of personal data obtained as a result of camera monitoring in accordance with Article 12 of the Law.

There is no monitoring in areas that may result in interference with the privacy of the person. Only a limited number of Company employees and authorized persons can access the security camera recordings if needed. The said persons who have access to the records declare that they will protect the confidentiality of the data they access, with the confidentiality agreement they signed.

7.3. Monitoring of Entrances and Exits Carried out at LEAP Building Entrances and Inside

By our company; Personal data processing is carried out in order to ensure security and for the purposes specified in this Policy, to monitor guest entries and exits in LEAP buildings and facilities.

While obtaining the identity data of the people who come to the LEAP buildings as guests, or through the texts posted by the Company or made available to the guests in other ways, the personal data owners are enlightened in this context. The data obtained for the purpose of tracking guest entry-exit is processed only for this purpose and the relevant personal data is recorded in the data recording system in the physical environment.

7.4. Users Visiting LEAP Websites

The movements of users visiting LEAP websites are monitored and analyzed anonymously in line with the possibilities provided by third parties such as Google and Facebook. In the use of this information, personal information sharing consents given by the website users to third parties are essential.

7.5. Providing LEAP Visitors with Internet Connection in the LEAP Building

LEAP offers a wireless network access that visitors can connect to within the campus boundaries. LEAP is accepted as an internet collective usage provider in accordance with the Law No. 5651, the Regulation on Internet Mass Usage Providers and the relevant legislation, and certain access records must be recorded by LEAP and kept for 2 years as per the legislation.



In this context, LEAP requests names, surnames and phone numbers from visitors who want to connect to the Wifi network, in order to fulfill its legal obligation as an internet collective use provider and to enable visitors to participate in the Wifi network. At the same time, information showing the IP address information, starting and ending time of use, the unique network device number (MAC address) of the computers and other information stipulated in the legislation of the visitors connecting to the LEAP Wifi network are recorded and stored for a limited period of time stipulated in the legislation. Your personal data may also be processed to provide LEAP's software, hardware and cyber security.

Personal data is obtained through the portal that provides access to the Wifi connection, and if it is expressly stipulated in the laws pursuant to the Law art.5/2/a, in order for LEAP to fulfill its legal obligations pursuant to art.5/2/e, art.5/2/e It is processed if it is necessary for the legitimate interests of the data controller, such as ensuring the security of the institution, for the establishment, exercise or protection of a right in accordance with Article 5/2/f, provided that it does not harm the fundamental rights and freedoms of the data subjects.

This personal data is shared by LEAP with authorized public institutions and organizations upon request.