

Privacy Notice on the Processing of Personal Data within the Scope of Your Voice

As Codeway Dijital Hizmetler Anonim Şirketi and Codeway Barcelona SL (together, “**Codeway**”), acting as the data controller, we aim to inform you, through this privacy notice, about the data processing activities carried out when you communicate with us through the Your Voice service assigned specifically to you.

During your communication with Your Voice, we kindly ask that you refrain from sharing any special categories of personal data unless necessary. Such data includes information relating to race, ethnic origin, political opinions, philosophical beliefs, religion, religious sect or other beliefs, appearance and clothing, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data.

I. Personal Data Processed, Data Categories, and Purposes of Processing Your Personal Data

When you contact us through Your Voice, we process the following personal data, where you provide such information to us, for the purpose of resolving the complaints submitted to us:

- Identity information (your first name, surname, degree of relationship if you are a relative of an employee/supplier, and your gender);
- Contact information (your email address, address/residential information, and telephone number);
- Employment/personnel information (your educational background, information regarding the position applied for/held, your title, and professional experience);
- Complaint information (other details included in your complaint).

II. Methods of Collecting Personal Data and Legal Grounds for Processing

Your personal data is collected and processed by automated means through the information and documents you provide to us electronically for the purposes set out above.

In this context, we process your personal data on the legal grounds that “the processing of personal data belonging to the parties to a contract is necessary, provided that it is directly related to the establishment or performance of a contract” and that “the processing is necessary for the legitimate interests of the data controller, provided that this does not prejudice the fundamental rights and freedoms of the data subject.”

III. Purposes and Recipient Groups for the Transfer of Your Personal Data

The personal data referred to above is shared with the following recipient groups for the following purposes:

- **With suppliers located abroad from whom we receive infrastructure services**, for the provision of information technology infrastructure services, email transmission services, storage and archiving activities, and the provision of the Your Voice service.
- **With authorized public institutions and organizations in Turkey**, for making the necessary notifications to the relevant official authorities in order to fulfill notification obligations arising from applicable legislation, and for providing information and documents to official authorities upon request.
- **With overseas subsidiaries and affiliates**, for the purposes of ensuring that the Your Voice processes are monitored and carried out in a coordinated manner among the Group companies.

IV. Your Rights as a Data Subject and Contact Information

Under the applicable legislation on the protection of personal data, you may exercise your data subject rights by submitting an application through any of the following methods:

a. For Turkey

- (i) In writing to the address “Esentepe Mh. Büyükdere Caddesi Ferkoo Apt. No:175/141 Şişli/İstanbul”,
- (ii) via email, from the email address previously notified to us and registered in our systems, to hello@codeway.co,
- (iii) via registered electronic mail to the registered electronic mail address codewaydijital@hs02.kep.tr,

If responding to your application requires an additional cost, you may be required to pay a fee.

b. For Spain

- (i) In writing to the address “Avenida de Roma, 81 (Estel Building), 08029 Barcelona, Spain”,
- (ii) via email, from the email address previously notified to us and registered in our systems, to hello@codeway.co,

Kind regards.

Last Update Date: 5 October 2026