

Information Notice on the Processing of Personal Data – Video Conferencing

At Borengo Charging Technology Investments Trade Inc. (“**Borengo**” or the “**Company**”), the protection of your personal data obtained during the execution of our processes is one of our top priorities. We place great importance on ensuring the security of your personal data and processing it in compliance with applicable legislation.

This clarification text is intended to inform you about the processing of your personal data when you contact the Company via video call through the “Contact Us” page of the website <https://5sari.com/tr> (the “**Site**”).

1. Which personal data do we process, for what purposes, and on what legal grounds?

Article 5 of the [Personal Data Protection Law](#) (the “**Law**”) sets out the legal grounds for the processing of personal data. Below, we have outlined which personal data we process, for what purposes, and the specific legal grounds we rely on for each of these purposes.

For What Purposes Are Your Data Processed?	What Are the Legal Grounds for Processing Your Data?	Processed Personal Data
<ul style="list-style-type: none">- In cases where an authorized institution or organization submits a request to our Company, or where we are required to notify such authorities, your data may be processed for the purpose of fulfilling our legal obligations (for example, sharing your information with a public authority in the event of a request related to a transaction suspected to be unlawful).	<p><u>Article 5/2 (ç) of the Law</u></p> <p>Processing is necessary for the data controller to fulfill its legal obligations.</p>	<ul style="list-style-type: none">- <u>Identity</u> (Full name)- <u>Contact Information</u> (Email address, phone number)- <u>Transaction Security</u> (IP address, information regarding your access to and exit from the Site)
<ul style="list-style-type: none">- In the event of a potential legal dispute, for the protection and exercise of our rights and the management of legal proceedings.	<p><u>Article 5/2 (e) of the Law</u></p> <p>Processing is necessary for the establishment, exercise, or protection of a right.</p>	<ul style="list-style-type: none">- <u>Visual and Audio Records</u>- <u>Other Information</u> (Your submitted feedback, request, or complaint)
<ul style="list-style-type: none">- To contact you in order to obtain detailed information regarding your request, feedback, or complaint,- To review and resolve your requests, feedback, and/or complaints,- To assess and audit our service processes and implement improvement efforts,- To conduct a video call with our representative as part of your request.	<p><u>Article 5/2 (f) of the Law</u></p> <p>Processing is necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.</p>	<ul style="list-style-type: none">- <u>Identity</u> (Full name)- <u>Contact Information</u> (Email address, phone number)- <u>Visual and Audio Records</u>- <u>Other Information</u> (Your submitted feedback, request, or complaint)

2. With Whom and for What Purposes Do We Share Your Personal Data?

Your personal data is shared with our domestic suppliers and business partners within the scope of the purposes and legal grounds outlined under the section “1. Which personal data do we process, for what purposes, and on what legal grounds?”

- **Authorized Institutions and Organizations** – In cases where authorized institutions or organizations request information from our Company or where we are required to notify them, your data may be shared for the purpose of fulfilling our legal obligations.
- **Suppliers and Business Partners** – Technical infrastructure support and cloud services may be obtained from third parties, located either within or outside of Turkey, in connection with systems used for the procurement of services from external providers.

Your personal data is transferred outside of Turkey in compliance with the Law and the provisions of the Regulation on the Procedures and Principles Regarding the Transfer of Personal Data Abroad, which entered into force upon its publication in the Official Gazette dated 10 July 2024 and numbered 32598 (“Regulation”). During the transfer of personal data abroad, Borusan and the recipient party act in accordance with the requirements set forth in Article 9 of the Law and the Regulation. Appropriate safeguards are implemented for the international transfer of personal data, including mechanisms that enable the data subject to exercise their rights and to access effective legal remedies in the destination country, as required under Article 9(4) of the Law.

3. What Methods Do We Use to Collect Your Personal Data?

We collect your personal data, as specified above, fully or partially through automated means via the Contact Us section on the Site.

4. Rights of the Data Subject as Set Out in Article 11 of the Law

Article 11 of the Personal Data Protection Law regulates the “rights of the data subject”. All natural persons whose personal data is processed by Borencok have the right, under the Law, to apply to the Company and exercise the legal rights specified therein. To exercise your rights, you may choose one of the application methods listed below.

- You may send a written request **by mail** to our Company’s address at: Pürtelaş Hasan Efendi Mah. Meclis-i Mebusan Cad. No: 35/37, Salıpazarı, 34427 Beyoğlu/Istanbul, Turkey.
- You may send an email containing your request to borencokvkk@5sarj.com **using your email address that is registered in our systems.**
- You may also submit your request using other methods specified in the [Communiqué on the Principles and Procedures for Application to the Data Controller.](#)