

A. IDENTITY OF THE DATA CONTROLLER

Enera Kozmetik İlaç ve Kimyevi Maddeler Ticaret LTD. ŞTİ, hereinafter referred to as “**Enera**”, carries out the sales, marketing, promotion, and public relations activities in Turkey of foreign universities that provide formal, distance, and open education. The foreign universities (whose names are stated below) that Enera carries out their relevant activities will be referred to as “**university**” here.

The term “**website**” refers to **www.enerahealth.com** and **www.avrupakampus.com**, and the term “**user**” refers to any natural or legal person who visits the website with the intention of getting information or communicating by filling out the information forms on the website, or any natural or legal person who visits the website. The term “**student**” refers to people who have applied to receive education from the university which Enera has a contract with, following Enera's promotion, sales, and marketing activities.

B. WHICH PERSONAL DATA ARE PROCESSING

Through the contact forms to be filled in on the website; “Name and surname”, “e-mail address”, and “contact number” data of the users who want to get information about the university's activities such as education offers, course contents, tuition fees, academic structure, and similar activities of the university which Enera carries out its marketing activities on the website, and;

“Educational status” and “identity information” data of users who, beyond getting information about the university, apply for registration to study at the university are processed.

The Purpose of Processing Personal Data - The Method and Legal Basis of Collection

1. a) The following personal data of users are processed for the following purposes.
 - Name and surname: To correctly address the person who wants to receive information,
 - Contact number: To reach via telephone to users who want to receive information about the educational activities of the university,
 - E-mail address: To send promotional materials via e-mail to users who want to receive written information about the educational activities of the university,
 - Educational status of the user: To determine whether the user has the necessary qualifications for the educational activities of the university and to suggest suitable educational activities for the user's education level,
 - Identity information of users: For registration procedures to obtain online education from the university,
 - To carry out necessary activities including but not limited to the determination and implementation of Enera's commercial and business strategies, marketing activities, business development and planning activities, to benefit you and/or the institutions and organizations it represents from the products and services offered by Enera,
 - To carry out administrative operations for communication carried out by Enera,
 - To ensure the security and control of locations in Enera's use,
 - To establish business partner/customer/supplier (officers or employees) relations,
 - To ensure contractual obligations and financial agreements regarding products and services offered with our business partners, suppliers, or other third parties,
 - To carry out Enera's human resources policies,
 - To call Enera's call center or use its website, and
 - For participation in training, seminars, or events organized by Enera.

1. b) Method of collection and storage of personal data: Your personal data that you share with our company may be collected verbally, in writing, or electronically through automatic or non-automatic methods, offices, branches, call center, website, social media channels, mobile applications, and similar means. Your personal data will be stored in a physical and/or electronic environment. Necessary business processes are designed, and technical security infrastructure developments are implemented in order to prevent your personal data provided and stored by our company from being exposed to unauthorized access, manipulation, loss, or damage in the environments where they are stored.

Provided that it is not used outside of the purposes and scope notified to you; your personal data will be processed by taking all necessary security measures and will be stored and processed for the legal retention period or, if such period is not foreseen, for the period required by the processing purpose. When this period expires, your personal data will be removed from our Company's data streams by deletion, destruction, or anonymization methods.

1. c) Transfer of Personal Data: Within the scope of Laws and other relevant legislation and for the explained purposes, your personal data may be transferred:
 - To the educational institution in the list below, which is stated as the University,
 - To authorized companies operating on behalf of our company and to our representatives,
 - To regulatory and supervisory institutions and to public institutions or organizations that are explicitly authorized to request your personal data in their applicable laws,
 - To business partnerships, supplier and contractor companies, banks, credit risk and financial institutions, and other real or legal persons within the scope of the stated purposes,
 - To tax and similar consultants, obligatory persons related to legal proceedings; institutions, organizations, and third parties from whom we receive consultancy, including auditors.
 - The "name and surname", "contact information", "e-mail address", "identity information", and "education information" data of students who applied for registration to receive education from the university; to understand whether they provide the necessary qualifications for university education, university registration procedures, to provide online university education completely, to evaluate the exams to be applied by the university, to carry out the necessary announcements by the university and other processes required by online education may be transferred to its affiliates, and
 - Without being limited to these, to business partners, third parties from whom service is received, authorized persons and organizations for the above-mentioned purposes in the country and abroad.

C. YOUR RIGHTS AS A USER

Your rights under the Article 11 of the Personal Data Protection Law: By applying to our Company you have the right; to learn whether your personal data are processed or not, to demand information as to if your personal data have been processed, to learn the purpose of the processing of your personal data and whether these personal data are used in compliance with the purpose, to know the third parties to whom your personal data are transferred in country or abroad, to request the rectification of the incomplete or inaccurate data if any, to request the erasure or destruction of your personal data under the conditions referred to in Article 7 of the Personal Data Protection Law, to request reporting of the aforementioned operation to third parties to whom your personal data have been transferred, to object to the occurrence of a result against you by analyzing the data processed solely through automated systems, to claim compensation for the damage arising from the unlawful processing of your personal data.

Pursuant to paragraph 1 of Article 13 of the Personal Data Protection Law, you may submit your requests regarding the exercise of your above-mentioned rights to our Company in writing or by other means determined by the Personal Data Protection Board.

To exercise your above-mentioned rights, you can personally deliver your request with the necessary information to determine your identity, or through a notary public, or you can send your request within the scope of Article 11 of the Personal Data Protection Law, which regulates the rights of the person concerned, determined by the Personal Data Protection Board, in writing to Yesilbaglar Mh. Kaptan Sk. No:19 Metroofis Plaza D:70-71-72-73-74 Pendik / ISTANBUL, or via e-mail if your membership is confirmed to the e-mail address info@enerahealth.com in accordance with the "Communiqué on the Principles and Procedures for the Request to Data Controller"