



Cookie Policy and Privacy Notice

This text has been prepared by Yeşil Siyah Denizcilik Lojistik Limited Şirketi (the "Company"), in its capacity as data controller, within the context of article 10 of the Personal Data Protection Law no. 6698 and the Communiqué on Procedures and Principles for Complying with Privacy Notice Requirements.

As a company, we use first-party and third-party cookies in certain areas of our website at <https://www.gnbmar.com/> (the "Website"). This Cookie Privacy Notice (the "Privacy Notice") is applicable for the Website managed by the Company, and such cookies will be used as provided in the Privacy Notice.

The purpose of this Privacy Notice is to inform you about which type of cookies we use for what purposes on our website with respect to the processing of your personal data, which is acquired automatically through the placing of cookies on your device, as well as how you can manage these cookies. We obtain explicit consent from users for all cookies other than required (strictly necessary) cookies used on our website and provide such users with the opportunity to change their preferences about their explicit consent whenever they desire.

What is a Cookie?

Cookies are small text files containing data in the name-value format created in your device by a website. Cookies enable the website that you visited to store data in your device to utilize such data during your next visit. Cookies created by a website are stored by the browser that you use to access the website and such cookies do not contain data such as the name, gender or address of the visitor. The data included in the cookies are only accessible if the same browser is used and only by the website creating the cookie, <https://www.gnbmar.com/>.

Cookies have nowadays become an important component of internet technologies and their basic function is to recollect the preferences of the online visitor and recognize the device during connection, as virtually all websites use cookies.

Who Sends Cookies and How?

Cookies are sent during your navigation through the communication established between the internet browser (Chrome, Firefox, Safari, Edge etc.) in your device and the Company's website servers.

Cookie Types:

- According to domain:



- First Party Cookies: Set into the device directly by the website visited or Company.
- Third-Party Cookies: Set into device by a third party that is in collaboration with the Company, such as an advertisement owner or analytical system.
- According to lifespan:
 - Session cookies: They provide data to be stored until the user closes the browser or the session ends. They are short term cookies.
 - Persistent cookies: Those are cookies that remain in the server until the cookie is deleted by the user or end of its life span. Persistent cookies contain a code that specifies a last use date with a variable life span.
- According to function:
 - Required (Strictly Necessary) Cookies: are necessary to navigate the website and to gain access to any secure areas thereof. Consent is not sought for these types of cookies.
 - Functional (Preference) Cookies: operate to recall past preferences on the website (user ID, password, language preferences, etc.). Preference cookies that allow automatic access to the website are also called functional cookies.
 - Analytics (Performance) Cookies: are also known as performance cookies, provide anonymous, statistical data about the use of the website. Analytics cookies allow the storage of data about the use of the website by the user, sites visited, connections clicked. The analytics cookies which are rendered anonymous are not used to identify the website user. The purpose of those cookies is to increase the functionality of the website.
 - Targeting cookies: These are cookies that can be used by the firms that create a profile of your interest and to show related advertisements for other sites.

The Purposes of Processing Personal Data and Legal Grounds

Required cookies are used to provide an information society service (logging-in, form filling, and remembering privacy settings) you have requested. Your personal data collected using such cookies are processed within the scope of Article 5(2)(c) "processing the personal data of the parties to a contract is necessarily provided that such processing is directly related to the execution or performance of the contract" or (f) "the data processing is necessary for the legitimate interests of the data controller provided that this processing shall not violate the fundamental rights and freedoms of the data subject" of the Law.



Our business partners use targeting and marketing cookies to create your profile according to your interests and show relevant advertisements to you. Personal data collected via such cookies are processed based on your explicit consent under article 5(1) of the Law.

Analytics cookies allow the statistical measurement of the behaviors of the users on websites. These cookies are often used to ameliorate the website, including measuring the impact of advertisements on data subjects. For example, they are used by the domain owner for estimating the number of single users, determining the most essential key words for search engines to direct to a website, or to monitor the navigation within the website. Personal data collected using such cookies are processed based on your explicit consent under article 5(1) of the Law or based on legal grounds other than explicit consent under Criterion B as listed under the Guideline on the Application of Cookies published by the Authority.

Functional cookies are used to personalize and increase the website's functionality (by ensuring it remembers your preferences, other than your privacy settings, the next time you log into the website). Personal data collected using such cookies are processed based on your explicit consent under article 5(1) of the Law or based on legal grounds other than explicit consent under Criterion B as listed under the Guideline on the Application of Cookies published by the Authority.

Information on Cookies Used on our Website

Cookie Name	Cookie Description	Retention Period	Cookie Type
_code_session	Session identification data, are identification data applicable to one session. As opposed to other cookies, they are not stored in the user's device and consequently do not require consent to be obtained.	Data erased at the end of the session.	Unclassified
_ga	This cookie is a persistent Google Analytics cookie used to distinguish between different users.	399 days	Analytics
_gid	This cookie is uploaded by Google Analytics. The cookie is used to store data regarding how visitors use a website and helps create an analytics report about how the website functions. Data collected include number of visitors, their source and pages	1 day	Analytics

	visited on an anonymous basis.		
_gat	This cookie does not retain any user data, it is only used to limit the number of requests required to be submitted to the website.	1 day	Targeting

Information on Cookies Used on our Website

Information on cookies used on our website is provided in the table above.

If you accept the cookies provided through a third-party infrastructure, you will be deemed to have consented to transfer your personal data abroad.

Management of Cookies

It is not necessary to use cookies to navigate our website. However, if your browser is set to reject cookies, the quality of your user experience may decline, and our sites may lose certain functions. Technical cookies, in particular, ensure the Site can provide its most basic functions. Because technical cookies underpin the Site's technical operations, should you choose to deactivate such cookies, certain parts of the Site may not operate adequately.

You may configure your browser to reject cookies for all sites or selected sites, issue a warning when a cookie is set, reject third-party cookies, or accept all cookies as session cookies. Furthermore, you may delete cookies on your browser or review the list and values of the cookies retained in your browser. For detailed information about your browser's cookie management functions, please click the link below to obtain information from your website.



Furthermore,

- To shut down the cookies managed by Google Analytics, [click here](#).
- To manage the personalized advertisement experience provided by Google, [click here](#).
- Preferences regarding cookies used for advertisement activities by many firms may be managed through [Your Online Choices](#).

Requests from Data Subjects



Pursuant to article 11 of the Law, as a data subject you are entitled to learn whether your personal data is being processed; if your personal data is being processed to demand information with regard thereto; to understand the purpose for the processing of your personal data and whether these have been used in line with such purpose; to know the identity of the third persons to whom your personal data has been transferred whether in the country or abroad; if your personal data has been processed inaccurately or incompletely to request the correction thereof; to request the erasure or destruction of your personal data under the conditions set forth in article 7; to ask that any actions taken in line with paragraphs (d) and (e) be notified to the third persons to whom the personal data had been transferred; to object to any conclusions against the interests of the data subject as may have been reached by analyzing the data processed exclusively through automated systems and; to claim compensation for any damages suffered because of the unlawful processing of your personal data. The Company reserves its terms of use regarding cookies and its right to amend the Cookie Privacy Notice.

International Regulations

The e-Privacy Directive (ePrivacy Directive: DIRECTIVE 2002/58/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications)), also known as the "EU Cookie Law" is privacy legislation that requires websites to obtain the consent of visitors before acquiring or retaining personal data. Its purpose is to recognize and protect the privacy rights of consumers in the event their data is processed or maintained. Furthermore, this Directive, a means to compliance concerning cookies and the European Union General Data Protection Regulation (GDPR), protects data controllers against legal disputes within the context of personal data on an international platform.

The regulatory framework explained above ensures that companies:

- do not use any cookies other than required (strictly necessary) cookies on their websites until they have obtained explicit consent from the user to do otherwise,
- explain the purpose and use of every single cookie before the user grants approval,
- keep proper records on user consent,
- permit access to content regardless,
- offer all users the opportunity to rescind their permission to use cookies quickly.

If the regulations apply to the Company, the consequences of non-compliance can be significant. The GDPR specifies substantial monetary fines, and as a result, depending on the type of breach, the Company may be faced with the following consequences:

- Monetary fines of up to 20 million Euros
- Monetary penalties equal to 2-4% of your company's global annual income from the previous fiscal year,



- The GDPR specifies that the fine imposed will be whichever amount is higher, and the more serious the accusation, the more increased the monetary penalty.
- Even minor breaches can lead to thousands of Euros of fines as well as exposing a risk to reputation.

GDPR: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=EN>

ePrivacy Directive:

<https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32002L0058>

If a company is required to comply with cookie legislation, the company may select one of three methods. These compliance solutions are appropriate for different uses depending on the relevant cookies:

- Opt-Out Compliance
 - With opt-out compliance, the company notifies users that cookies are being used and offers them the option of obtaining more information about the process. If data subjects want more information, they can select which cookies to save and opt out of the others.
 - This method should be used very carefully. Even though it complies with the CCPA (California Consumer Privacy Act), it still violates the GDPR because it places cookies onto the user's device without first obtaining the user's consent.
- Opt-In Compliance
 - The cookie notice offers users two buttons: one to accept all cookies and another to reject all cookies. Users must actively click on a button to indicate their acceptance of all cookies.
 - Furthermore, opt-in compliance does not permit websites to leave cookies or gather information on users' devices without explicit consent from users.
 - This method complies with the GDPR and the CCPA (when a website collects information from minors).
- Cookie Notice without Accept or Reject Options
 - In this method, the company provides a clear explanation about the cookies used on its website and notifies visitors that they accept them by using the website.
 - This method can prove problematic regarding the GDPR because it needs to obtain explicit consent.