

Transferred Data Categories, Definitions, and Purposes of Data Transfer

Business Partner

- **Definition:**

Business partners with whom Edusama engages for purposes such as the sale, promotion and marketing of its remote education services and products, and the provision of after-sales support, including partner banks.

- **Purpose of Data Transfer:**

Limited to the establishment and execution of business partnership activities and objectives.

Supplier

- **Definition:**

Parties that provide services to Edusama in line with Edusama's data-processing purposes and requirements.

- **Purpose of Data Transfer:**

Limited to the procurement of goods and services necessary for Edusama to carry out its outsourced commercial activities.

Shareholders

- **Definition:**

Real persons who have established a shareholder relationship with Edusama.

- **Purpose of Data Transfer:**

Limited to the planning, execution and supervision of strategies related to Edusama's commercial activities.

Legally Authorized Public Institutions and Organizations

- **Definition:**

Public institutions and organizations such as the Social Security Institution and Tax Offices that are legally authorized under relevant legislation to request information and documents from Edusama.

- **Purpose of Data Transfer:**

Limited to the purposes requested within the scope of the legal authority of such public institutions and organizations.

Legally Authorized Private Legal Entities

- **Definition:**

Institutions and organizations that maintain their operations in accordance with the requirements of relevant legislation and whose operational scope includes matters requiring data transfer.

- **Purpose of Data Transfer:**

Limited to matters falling within the scope of their operational activities.

Edusama Board Members

- **Definition:**

Members of the Edusama Board of Directors.

- **Purpose of Data Transfer:**

Limited to the execution of Board of Directors activities.