

# PERSONAL DATA PROTECTION AND PROCESSING POLICY

Version 1.1

## **INTRODUCTION**

This policy prepared within the scope of personal data protection has been prepared for use throughout our company named below.

Our company;

### **UZ. DR. ENDER VARDAR**

The protection of personal data is among the most important priorities of our company. The most important part of this subject is constituted by the protection and processing of the personal data of our customers, guests, potential customers, employee candidates, company shareholders, company officials, visitors, the employees, shareholders and officials of institutions we cooperate with, and third parties, governed by this Policy. The activities carried out by our Company regarding the protection of our employees' personal data are managed under the Company Employees Personal Data Protection and Processing Policy, which is drafted in parallel with the principles in this Policy.

According to the Constitution of the Republic of Türkiye, everyone has the right to request the protection of personal data concerning them. Regarding the protection of personal data, which is a constitutional right, the Company shows the necessary care for the protection of the personal data of its customers, potential customers, employee candidates, company shareholders, company officials, visitors, the employees, shareholders and officials of institutions it cooperates with, and third parties, governed by this Policy, and makes this a company policy.

Within this scope, the necessary administrative and technical measures are taken by the shareholders of the Company within the borders of the Republic of Türkiye for the protection of personal data processed pursuant to the relevant legislation.

In this Policy, detailed explanations will be provided regarding the basic principles adopted by our company in the processing of personal data and listed below:

- Processing personal data in compliance with the law and the rule of honesty,
- Keeping personal data accurate and up to date when necessary,
- Processing personal data for specific, explicit and legitimate purposes,
- Processing personal data in a manner that is relevant, limited and proportionate to the purpose for which they are processed,
- Retaining personal data for the period stipulated in the relevant legislation or required for the purpose for which they are processed,
- Informing and enlightening personal data owners,
- Establishing the necessary system for personal data owners to exercise their rights,
- Taking necessary measures in the preservation of personal data,
- Acting in compliance with the relevant legislation and KVK Board regulations in transferring personal data to third parties in line with the requirements of the processing purpose,
- Showing the necessary sensitivity in the processing and protection of special categories of personal data.

## **1.2. PURPOSE OF THE POLICY**

The main purpose of this Policy is to provide explanations about the personal data processing activity carried out lawfully by our company and the systems adopted for the protection of personal data, and within this scope, to ensure transparency by informing the persons whose personal data are processed by our company, especially our customers, potential customers, employees, employee candidates, company shareholders, company officials, visitors, employees, shareholders and officials of institutions we cooperate with, and third parties.

## **1.3 SCOPE**

This Policy relates to all personal data of our customers, potential customers, employees, employee candidates, company shareholders, company officials, visitors, employees, shareholders and officials of institutions we cooperate with, and third parties processed by automatic means or non-automatic means provided that they are part of any data recording system.

The application scope of this Policy regarding the personal data owner groups in the categories specified above may cover the entire Policy (e.g. our active customers who are also our visitors); or only some provisions (e.g. only our visitors).

## **1.4 APPLICATION OF THE POLICY AND THE RELEVANT LEGISLATION**

The relevant legal regulations in force regarding the processing and protection of personal data shall be applied to our company structure as a priority. In case of incompatibility between the legislation in force and the Policy, our Company accepts that the legislation and law in force shall prevail.

The Policy has been created by concretizing and regulating the rules set forth by the relevant legislation within the scope of our Company's practices. Our Company carries out the necessary systems and preparations in order to act in accordance with the effective periods stipulated in the KVK Law.

## **1.5 EFFECTIVENESS OF THE POLICY**

This Policy issued by our Company was created on 4.6.2018 and revised on 11.06.2019 within the framework of our changing business processes and compliance with Law No. 6698, and entered into force as version 1.1. In case all or certain articles of the Policy are renewed, the effective date of the Policy shall be updated.

The Policy is published on our Company's website and in all affiliated businesses and facilities and is made available to relevant persons upon request of personal data owners.

## **2. MATTERS RELATING TO THE PROTECTION OF PERSONAL DATA**

### **2.1. ENSURING THE SECURITY OF PERSONAL DATA**

#### **2.1.1. Technical and Administrative Measures Taken to Ensure the Lawful Processing of Personal Data**

Our Company takes technical and administrative measures according to technological possibilities and implementation cost in order to ensure the lawful processing of personal data.

##### **(i) Technical Measures Taken to Ensure the Lawful Processing of Personal Data**

The main technical measures taken by our Company to ensure the lawful processing of personal data are listed below:

- Personal data processing activities carried out within our Company are audited.
- The technical measures taken are periodically reported to the relevant person as required by the internal audit mechanism.
- In technical matters, although the servers containing personal data within our company are in a single location, necessary security measures have been taken on all our employees' computers and data entry computers. This ensures that the data can be managed more easily and their security can be ensured.

#### **(ii) Administrative Measures Taken to Ensure the Lawful Processing of Personal Data**

The main administrative measures taken by our Company to ensure the lawful processing of personal data are listed below:

- Employees are informed and trained on personal data protection law and lawful processing of personal data.
- All activities carried out by our Company are analyzed in detail on the basis of all business units, and as a result of this analysis, personal data processing activities specific to the commercial activities carried out by the relevant business units are revealed.
- The personal data processing activities carried out by our Company's business units; the requirements to be fulfilled in order to ensure compliance of these activities with the personal data processing conditions required by Law No. 6698 and GDPR compliance are determined specifically for each business unit and the detailed activity it carries out.
- In order to ensure the legal compliance requirements determined on the basis of our business units, awareness is created specifically for the relevant business units and application rules are determined; necessary administrative measures are implemented through Company internal policies and trainings to ensure the audit of these matters and the continuity of implementation.
- Records imposing obligations not to process, disclose or use personal data, except for the Company's instructions and exceptions introduced by law, are included in the contracts and documents governing the legal relationship between our Company and employees, and awareness of employees is created and audits are carried out in this regard.

#### **2.1.2. Technical and Administrative Measures Taken to Prevent Unlawful Access to Personal Data**

Our Company takes technical and administrative measures according to the nature of the data to be protected, technological possibilities and implementation cost in order to prevent careless or unauthorized disclosure, access, transfer or all other forms of unlawful access to personal data.

##### **(i) Technical Measures Taken to Prevent Unlawful Access to Personal Data**

The main technical measures taken by our Company to prevent unlawful access to personal data are listed below:

- Technical measures appropriate to developments in technology are taken, and the measures taken are periodically updated and renewed.
- Access and authorization technical solutions are put into operation in line with legal compliance requirements determined on a business unit basis.

- The technical measures taken are periodically reported to the relevant person as required by the internal audit mechanism, and issues posing risk are re-evaluated and necessary technological solutions are produced.
- Software and hardware including virus protection systems and firewalls are installed.
- All data management has been centralized.

**(ii) Administrative Measures Taken to Prevent Unlawful Access to Personal Data**

The main administrative measures taken by our Company to prevent unlawful access to personal data are listed below:

- Employees are trained on technical measures to be taken to prevent unlawful access to personal data.
- Processes for access to personal data and authorization within the Company are designed and implemented in accordance with legal compliance requirements on a business unit basis.
- Employees are informed that they cannot disclose personal data they learn to others in violation of the provisions of the KVK Law and GDPR provisions and cannot use them outside the processing purpose, and that this obligation shall continue after they leave their duties, and the necessary undertakings are obtained from them accordingly.
- Provisions are added to the contracts concluded with persons to whom personal data are lawfully transferred by our Company stating that the persons to whom personal data are transferred shall take the necessary security measures for the protection of personal data and ensure compliance with these measures in their own organizations.

**2.1.3. Storage of Personal Data in Secure Environments**

Our Company takes the necessary technical and administrative measures according to technological possibilities and implementation cost in order to store personal data in secure environments and prevent their unlawful destruction, loss or alteration.

**(i) Technical Measures Taken for Storage of Personal Data in Secure Environments**

The main technical measures taken by our Company for storage of personal data in secure environments are listed below:

- Systems appropriate to technological developments are used for storing personal data in secure environments.
- Technical security systems are installed for storage areas, the technical measures taken are periodically reported to the relevant person as required by the internal audit mechanism, and issues posing risk are re-evaluated and necessary technological solutions are produced.
- Backup programs are used lawfully to ensure that personal data are stored securely.

**(ii) Administrative Measures Taken for Storage of Personal Data in Secure Environments**

The main administrative measures taken by our Company for storage of personal data in secure environments are listed below:

- Employees are trained on ensuring secure storage of personal data.

- In case a service is received from outside due to technical requirements regarding the storage of personal data by our Company, provisions are included in the contracts concluded with the relevant companies to whom personal data are lawfully transferred stating that the persons to whom personal data are transferred shall take the necessary security measures for the protection of personal data and ensure compliance with these measures in their own organizations.

#### **2.1.4. Audit of Measures Taken Regarding Protection of Personal Data**

Our Company, in accordance with Article 12 of the KVK Law, conducts or has conducted the necessary audits within its own body. The results of these audits are reported to the relevant department within the scope of the Company's internal functioning and the necessary activities are carried out to improve the measures taken.

#### **2.1.5. Measures to Be Taken in Case of Unauthorized Disclosure of Personal Data**

Our Company operates the system that ensures that in the event that personal data processed in accordance with Article 12 of the KVK Law are obtained by others through unlawful means, this situation is notified to the relevant personal data owner and the KVK Board as soon as possible. If deemed necessary by the KVK Board, this situation may be announced on the KVK Board's website or by another method.

### **2.2. SAFEGUARDING THE RIGHTS OF THE DATA OWNER**

Creation of the channels through which these rights will be communicated to our company and evaluation of data owners' requests;

Our Company carries out the necessary channels, internal operation, administrative and technical arrangements in accordance with Article 13 of the KVK Law for the evaluation of personal data owners' rights and providing the necessary information to personal data owners.

If personal data owners submit their requests regarding the rights listed below to our Company in writing, our Company finalizes the request free of charge as soon as possible and at the latest within thirty days depending on the nature of the request. However, if the transaction requires an additional cost, the fee in the tariff determined by the KVK Board will be charged by our Company. Personal data owners;

- To learn whether personal data is processed,
- To request information if personal data has been processed,
- To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- To know the third parties to whom personal data is transferred domestically or abroad,
- To request correction of personal data if it is incomplete or incorrectly processed and to request notification of the transaction made within this scope to third parties to whom personal data has been transferred,
- To request the deletion or destruction of personal data in case the reasons requiring processing have ceased to exist, although it has been processed in accordance with the KVK

Law and other relevant law provisions, and to request notification of the transaction made within this scope to third parties to whom personal data has been transferred,

- To object to the emergence of a result against the person himself/herself by analyzing the processed data exclusively through automated systems,
  - To request compensation for the damage in case of damage due to unlawful processing of personal data,
- have these rights. More detailed information regarding the rights of data owners is provided in Section 10 of this Policy.

### **2.3. PROTECTION OF SPECIAL CATEGORIES OF PERSONAL DATA**

With the KVK Law, special importance has been attached to certain personal data due to the risk of causing victimization or discrimination if processed unlawfully.

These data are; race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing and attire, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data.

Our Company acts sensitively in the protection of special categories of personal data, which are determined as “special categories” by the KVK Law and processed lawfully. Within this scope, the technical and administrative measures taken by our Company for the protection of personal data are carefully implemented for special categories of personal data, and necessary audits are ensured within our company.

Detailed information regarding the processing of special categories of personal data is provided in Section 3 of this Policy.

### **2.4. INCREASING AND AUDITING THE AWARENESS OF BUSINESS UNITS ON THE PROTECTION AND PROCESSING OF PERSONAL DATA**

Our Company ensures that the necessary trainings are organized for business units in order to increase awareness aimed at preventing unlawful processing of personal data, preventing unlawful access to data, and ensuring preservation of data.

Necessary systems are established in our Company and all our branches for the awareness of current employees of business units and employees newly included in the business unit regarding the protection of personal data, and professional persons are worked with if needed on the subject.

### **2.5. INCREASING AND AUDITING THE AWARENESS OF BUSINESS PARTNERS AND SUPPLIERS ON THE PROTECTION AND PROCESSING OF PERSONAL DATA**

Our Company ensures that trainings and seminars are organized for business partners in order to increase awareness aimed at preventing unlawful processing of personal data, preventing unlawful access to data and ensuring preservation of data.

Necessary systems are established for the awareness of our Company’s current employees and employees newly included in the business unit regarding the protection of personal data, and professional persons are worked with if needed on the subject. All activities carried out to increase awareness of our Company’s business partners regarding the protection and processing of personal data are reported to our Company management and shareholders. In this direction, our Company applies Supplier confidentiality agreements to all business partners and ensures its sensitivity in the

Protection of Personal Data with business partners in accordance with the relevant contractual clauses.

### **3. MATTERS RELATING TO THE PROCESSING OF PERSONAL DATA**

#### **3.1. PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH THE PRINCIPLES STIPULATED IN LEGISLATION**

##### **3.1.1. Processing in Compliance with Law and the Rule of Honesty**

Our Company acts in accordance with the principles introduced by legal regulations and the general rule of trust and honesty in the processing of personal data. Within this scope, our Company takes into account proportionality requirements in the processing of personal data and does not use personal data outside what is required by the purpose.

##### **3.1.2. Ensuring Personal Data Are Accurate and Up to Date When Necessary**

Our Company ensures that the personal data it processes are accurate and up to date, taking into account the fundamental rights of personal data owners and its own legitimate interests. It takes necessary measures accordingly. For example, by our Company; a system has been established for personal data owners to correct and confirm the accuracy of their personal data. Detailed information on this subject is provided in Section 10 of this Policy.

##### **3.1.3. Processing for Specific, Explicit and Legitimate Purposes**

Our Company determines the legitimate and lawful personal data processing purpose clearly and precisely. Our Company processes personal data as much as connected with and necessary for the service it provides. The purpose for which personal data will be processed by our Company is put forward before the personal data processing activity begins.

##### **3.1.4. Being Relevant, Limited and Proportionate to the Purpose for Which They Are Processed**

Our Company processes personal data in a manner suitable for achieving the determined purposes and avoids processing personal data that are not related to or not needed for the realization of the purpose. For example, no personal data processing activity is carried out to meet needs that may arise later.

##### **3.1.5. Retaining for the Period Stipulated in the Relevant Legislation or Required for the Purpose for Which They Are Processed**

Our Company retains personal data only for the period specified in the relevant legislation or required for the purpose for which they are processed. Within this scope, our Company first determines whether a period is stipulated in the relevant legislation for the storage of personal data; if a period is determined, acts in accordance with this period; if a period is not determined, stores personal data for the period required for the purpose for which they are processed. At the end of the period or when the reasons requiring processing cease to exist, personal data are deleted, destroyed or anonymized by our Company. Personal data are not stored by our Company with the possibility of future use. Detailed information on this subject is provided in Section 9 of this Policy.

### **3.2. PROCESSING OF PERSONAL DATA BASED ON ONE OR MORE OF THE PERSONAL DATA PROCESSING CONDITIONS SPECIFIED IN ARTICLE 5 OF THE KVK LAW AND LIMITED TO THESE CONDITIONS**

Protection of personal data is a constitutional right. Fundamental rights and freedoms may be restricted only by law and depending on the reasons specified in the relevant articles of the Constitution, without touching their essence. Pursuant to the third paragraph of Article 20 of the Constitution, personal data may only be processed in cases stipulated by law or with the explicit consent of the person. In this direction and in compliance with the Constitution, our Company processes personal data only in cases stipulated by law or with the explicit consent of the person. Detailed information on this subject is provided in Section 7 of this Policy.

### **3.3. ENLIGHTENMENT AND INFORMATION OF THE PERSONAL DATA OWNER**

Our Company enlightens personal data owners during the collection of personal data in accordance with Article 10 of the KVK Law. Within this scope, our company provides enlightenment regarding the identity of our company and, if any, its representative, for what purpose personal data will be processed, to whom and for what purpose processed personal data may be transferred, the method and legal reason of collecting personal data, and the rights held by the personal data owner. Detailed information on this subject is provided in Section 10 of this Policy.

In Article 20 of the Constitution, it is set forth that everyone has the right to be informed about personal data concerning them. In this direction, “requesting information” is also counted among the rights of the personal data owner in Article 11 of the KVK Law. Within this scope, our Company provides the necessary information when the personal data owner requests information, in accordance with Articles 20 of the Constitution and 11 of the KVK Law. Detailed information on this subject is provided in Section 10 of this Policy.

### **3.4. PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA**

In the processing of personal data determined as “special categories” by the KVK Law, our Company acts in sensitive compliance with the regulations stipulated in the KVK Law.

In Article 6 of the KVK Law, certain personal data that carry the risk of causing victimization or discrimination if processed unlawfully are determined as “special categories.” These data are; race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing and attire, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data.

In compliance with the KVK Law, by our Company; special categories of personal data are processed in the following cases provided that adequate measures to be determined by the KVK Board are taken:

- If the personal data owner has explicit consent, or
- If the personal data owner does not have explicit consent;
- Special categories of personal data other than the personal data owner’s health and sexual life, in cases stipulated by laws,
- Special categories of personal data relating to the personal data owner’s health and sexual life only by persons under obligation of confidentiality or authorized institutions and

organizations for the purpose of protection of public health, preventive medicine, medical diagnosis, treatment and care services.

- The highest level measures have been taken within the company for the processing and recording of special categories of data, and as soon as the transaction regarding the data is completed, they are destroyed regardless of the destruction period.

### **3.5. TRANSFER OF PERSONAL DATA**

- Our Company may transfer the personal data and special categories of personal data of the personal data owner to third parties (third party companies, business partners, third natural persons) by taking the necessary security measures in line with lawful personal data processing purposes. In this direction, our Company acts in accordance with the regulations stipulated in Article 8 of the KVK Law. Detailed information on this subject is provided in Section 6 of this Policy.

#### **3.5.1. Transfer of Personal Data**

Our Company may transfer personal data to third parties based on one or more of the personal data processing conditions specified in Article 5 of the Law listed below, in line with legitimate and lawful personal data processing purposes and limited thereto:

- If the personal data owner has explicit consent;
- If there is an explicit provision in laws regarding the transfer of personal data,
- If it is mandatory for the protection of the life or bodily integrity of the personal data owner or another person and the personal data owner is unable to disclose consent due to actual impossibility or his/her consent is not legally valid;
- If transfer 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,
- If personal data transfer is mandatory for our Company to fulfill its legal obligation,
- If personal data has been made public by the personal data owner,
- If personal data transfer is mandatory for the establishment, exercise or protection of a right,
- If personal data transfer is mandatory for the legitimate interests of our Company, provided that it does not harm the fundamental rights and freedoms of the personal data owner.

#### **3.5.2. Transfer of Special Categories of Personal Data**

Our Company, by showing necessary care, taking necessary security measures and taking adequate measures stipulated by the KVK Board; may transfer the special categories of personal data of the personal data owner to third parties in the following cases in line with legitimate and lawful personal data processing purposes.

- If the personal data owner has explicit consent, or
- If the personal data owner does not have explicit consent;
- Special categories of personal data other than the personal data owner's health and sexual life (race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs,

clothing and attire, membership of associations, foundations or trade unions, criminal conviction and data related to security measures, as well as biometric and genetic data), in cases stipulated by laws,

- Special categories of personal data relating to the personal data owner's health and sexual life only by persons under obligation of confidentiality or authorized institutions and organizations for the purpose of protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

### **3.6. TRANSFER OF PERSONAL DATA ABROAD**

Our Company does not transfer personal data abroad for lawful personal data processing purposes except for the special cases stated in Articles 3.6.1 and 3.6.2. In this direction, our Company acts in accordance with the regulations stipulated in Article 9 of the KVK Law. Detailed information on this subject is provided in Section 6 of this Policy.

#### **3.6.1. Transfer of Personal Data Abroad**

Our Company may transfer personal data to Foreign Countries Where the Data Controller Has Adequate Protection or Undertakes Adequate Protection in the presence of one of the following cases if the personal data owner has explicit consent or if the personal data owner does not have explicit consent, in line with legitimate and lawful personal data processing purposes:

- If there is an explicit provision in laws regarding the transfer of personal data,
- If it is mandatory for the protection of the life or bodily integrity of the personal data owner or another person and the personal data owner is unable to disclose consent due to actual impossibility or his/her consent is not legally valid;
- If transfer 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,
- If personal data transfer is mandatory for our Company to fulfill its legal obligation,
- If personal data has been made public by the personal data owner,
- If personal data transfer is mandatory for the establishment, exercise or protection of a right,
- If personal data transfer is mandatory for the legitimate interests of our Company, provided that it does not harm the fundamental rights and freedoms of the personal data owner.

#### **3.6.2. Transfer of Special Categories of Personal Data Abroad**

Our Company does not transfer special categories of data abroad except in the following cases. Although it does not transfer special categories of data to persons, in cases where it is obliged, by showing necessary care, taking necessary security measures and taking adequate measures stipulated by the KVK Board;

It may transfer the special categories of personal data of the personal data owner to Foreign Countries Where the Data Controller Has Adequate Protection or Undertakes Adequate Protection in the following cases in line with legitimate and lawful personal data processing purposes.

- If the personal data owner has explicit consent, or

- If the personal data owner does not have explicit consent;
- Special categories of personal data other than the personal data owner's health and sexual life (race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing and attire, membership of associations, foundations or trade unions, criminal conviction and data related to security measures, as well as biometric and genetic data), in cases stipulated by laws,
- Special categories of personal data relating to the personal data owner's health and sexual life only within the scope of processing by persons under obligation of confidentiality or authorized institutions and organizations for the purpose of protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

## **4. CATEGORIZATION OF PERSONAL DATA PROCESSED BY OUR COMPANY, PROCESSING PURPOSES AND RETENTION PERIODS**

### **4.1. CATEGORIZATION OF PERSONAL DATA**

Within our Company, by informing relevant persons pursuant to Article 10 of the KVK Law, personal data in the categories specified below are processed for the periods limited within the scope of this Policy by complying with the general principles specified in the KVK Law, especially the principles specified in Article 4 regarding the processing of personal data, and all obligations regulated in the KVK Law, based on one or more of the personal data processing conditions specified in Article 5 of the KVK Law and limited thereto, in line with our Company's legitimate and lawful personal data processing purposes. Which data owners the personal data processed in these categories are related to within the scope of this Policy is also specified in Section 5 of this Policy.

### **PERSONAL DATA | EXPLANATION OF PERSONAL DATA CATEGORIZATION**

#### **Identity Information**

Clearly belongs to an identified or identifiable natural person; processed partially or fully automatically or non-automatically as part of a data recording system; all information contained in documents such as Driver's License, Identity Card, Residence Certificate, Passport, Attorney ID, Marriage Certificate.

#### **Contact Information**

Clearly belongs to an identified or identifiable natural person; processed partially or fully automatically or non-automatically as part of a data recording system; information such as phone number, address, e-mail.

#### **Location Data**

Clearly belongs to an identified or identifiable natural person; processed partially or fully automatically or non-automatically as part of a data recording system; information that determines the location of the personal data owner while using our products and services or while employees of institutions we cooperate with and our employees use our Company vehicles.

#### **Customer or Guest Information**

Clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; information obtained and

produced about the relevant person as a result of our commercial activities and the operations carried out by our business units within this framework.

### **Family Members and Relatives Information**

Clearly belongs to an identified or identifiable natural person and is included in the data recording system; information about the family members and relatives of the personal data owner for purposes related to the products and services we offer or to protect the legal interests of the Company and the data owner.

### **Customer Transaction Information**

Clearly belongs to an identified or identifiable natural person and is included in the data recording system; records regarding the use of our products and services and information such as instructions and requests necessary for the customer's use of products and services.

### **Physical Space Security Information**

Clearly belongs to an identified or identifiable natural person and is included in the data recording system; personal data regarding records and documents taken at the entrance to the physical space and during stay within the physical space.

### **Transaction Security Information**

Clearly belongs to an identified or identifiable natural person and is included in the data recording system; your personal data processed in order to ensure our technical, administrative, legal and commercial security while carrying out our commercial activities.

### **Risk Management Information**

Clearly belongs to an identified or identifiable natural person and is included in the data recording system; personal data that can be processed through methods used in accordance with generally accepted legal and commercial custom and the rule of honesty in order for us to manage our commercial, technical and administrative risks.

### **Financial Information**

Clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; personal data processed regarding all kinds of information, documents and records showing the financial results created according to the type of legal relationship established by our company with the personal data owner.

### **Personnel File Information**

Clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; all personal data processed for obtaining information that will form the basis for the formation of personal rights of our employees or natural persons in a working relationship with our Company.

### **Employee Transaction Information and Employee Candidate Information**

Clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; personal data processed regarding all kinds of transactions carried out in relation to work by our employees or natural persons in a working relationship with our company.

Clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; personal data processed regarding individuals who have applied to become employees of our Company or who have been

evaluated as employee candidates in line with our Company's human resources needs pursuant to commercial custom and the rule of honesty, or who are in a working relationship with our Company.

#### **Employee Performance and Career Development Information**

Clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; personal data processed for measuring the performance of our employees or natural persons in a working relationship with our Company and planning and execution of their career development within the scope of our company's human resources policy.

#### **Fringe Benefits and Benefits Information**

Clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; your personal data processed for planning the fringe benefits and benefits we offer and will offer to employees or other natural persons in a working relationship with our Company, determining objective criteria related to entitlement to these, and tracking entitlements.

#### **Legal Transaction and Compliance Information**

Clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; your personal data processed within the scope of determination and follow-up of our legal receivables and rights, fulfillment of our debts, legal obligations and compliance with our company's policies.

#### **Audit and Inspection Information**

Clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; your personal data processed within the scope of our Company's legal obligations and compliance with company policies.

#### **Special Categories of Personal Data**

Clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; data specified in Article 6 of Law No. 6698.

#### **Marketing Information**

Clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; personal data processed for customizing and marketing our products and services in line with the personal data owner's usage habits, liking and needs, and reports and evaluations created as a result of these processing results.

#### **Request/Complaint Management Information**

Clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; personal data regarding the receipt and evaluation of all kinds of requests or complaints directed to our Company.

### **4.2. PURPOSES OF PROCESSING PERSONAL DATA**

According to the categorization prepared by our Company, the upper purposes regarding the processing of personal data are shared below:

- Carrying out the necessary work by our relevant business units for the realization of commercial activities carried out by our Company and executing the related business processes,
- Planning and execution of our Company's Commercial and/or business strategies,
- Carrying out the necessary work by our business units and execution of the relevant processes in order to enable relevant persons to benefit from the products and services offered by our Company,
- Planning and execution of our Company's human resources policies and processes,
- Ensuring the legal, technical and commercial occupational safety of relevant persons in business relationship with our Company.
- Compliance with laws and legal requirements

The data processing purposes within the scope of the upper purposes listed above are as follows:

- Analysis and planning of processes in public tenders and private tenders
- Discovery and market research within the scope of project evaluation in tenders
- Planning and Execution of Corporate Communication Activities
- Planning and Execution of Information Security Processes
- Creation and Management of Information Technologies Infrastructure
- Planning and Execution of Access Authorizations of Business Partners and/or Suppliers to Information and Facilities
- Planning and Execution of Fringe Benefits and Benefits for Supplier and/or Business Partner Employees
- Follow-up of Finance and/or Accounting Affairs
- Management of Relations with Business Partners and/or Suppliers
- Planning and Execution of Product and/or Service Sales Processes
- Carrying out activities for Determining Customers' Financial Risks
- Follow-up of Contract Processes and/or Legal Claims
- Follow-up of Customer Requests and/or Complaints
- Planning Human Resources Processes
- Execution of Personnel Procurement Processes
- Planning and Execution of Market Research Activities for Sales and Marketing of Products and Services
- Legal Payroll Process
- Planning and Execution of Marketing Processes of Products and/or Services

- Follow-up of Legal Affairs
- Planning and Execution of Necessary Operational Activities to Ensure that Company Activities are Carried out in Accordance with Company Procedures and/or Relevant Legislation
- Collection of Entry and Exit Records of Business Partner/Supplier Employees
- Creation and Follow-up of Visitor Records
- Planning and Execution of Company Audit Activities
- Planning and/or Execution of Occupational Health and/or Safety Processes
- Management and/or Audit of Relations with Affiliates
- Ensuring Security of Company Assets and/or Resources
- Planning and/or Execution of Company Financial Risk Processes

In order to carry out personal data processing activities within the scope of personal data processing purposes other than the situations specified above, our Company applies to the explicit consent of personal data owners; the personal data processing activities specified below are carried out by relevant business units regarding the mentioned explicit consents of personal data owners. In this framework; in the absence of the conditions stated above, personal data processing purposes for which explicit consent of personal data owners is sought are:

- Planning and Execution of Access Authorizations of Business Partners and/or Suppliers to Information and Facilities
- Management of Relations with Business Partners and/or Suppliers
- Planning and Execution of Product and/or Service Sales Processes
- Planning and Execution of Customer Relations Management Processes
- Planning and Execution of Market Research Activities for Sales and Marketing of Products and Services
- Planning and/or Execution of Processes for Creating and/or Increasing Loyalty to Products and/or Services Offered by the Company
- Planning and Execution of Marketing Processes of Products and/or Services
- Planning and Execution of Necessary Operational Activities to Ensure that Company Activities are Carried out in Accordance with Company Procedures and/or Relevant Legislation
- Collection of Entry and Exit Records of Business Partner/Supplier Employees
- Planning and Execution of Company Audit Activities
- Ensuring Security of Company Campuses and/or Facilities can be listed.

### **4.3. RETENTION PERIODS OF PERSONAL DATA**

Our Company stores personal data for the period specified in the relevant laws and legislation if stipulated in the relevant laws and legislation.

If a period is not regulated in the legislation regarding how long personal data should be stored, personal data are processed for the period required according to our Company's practices and the customs of commercial life in connection with the services our Company offers while processing that data, and then deleted, destroyed or anonymized. Detailed information on this subject is provided in Section 9 of this Policy.

If the purpose of processing personal data has ended and the retention periods determined by relevant legislation and the company have also ended; personal data may be stored only for the purpose of constituting evidence in possible legal disputes or enabling the assertion of the relevant right related to the personal data or establishment of defense. In establishing the periods here, retention periods are determined based on the statute of limitations periods for asserting the aforementioned right and examples in requests previously directed to our Company on the same matters despite the expiration of statute of limitations periods. In this case, no access is made to the stored personal data for any other purpose, and access to the relevant personal data is provided only when it is necessary to use them in the relevant legal dispute. Here too, after the expiration of the aforementioned period, personal data are deleted, destroyed or anonymized.

### **5. CATEGORIZATION REGARDING THE OWNERS OF PERSONAL DATA PROCESSED BY OUR COMPANY**

Although personal data of the personal data owner categories listed below are processed by our Company, the application scope of this Policy is limited to our customers, potential customers, employee candidates, company shareholders, company officials, visitors, employees, shareholders and officials of institutions we cooperate with, and third parties.

The protection and processing activities of our employees' personal data shall be evaluated under our company employees Personal Data Protection and Processing Policy.

Although the categories of persons whose personal data are processed by our Company are within the scope specified above, persons outside these categories may also direct their requests to our Company within the scope of the KVK Law; the requests of these persons shall also be evaluated within the scope of this Policy.

Below, clarification is provided regarding the concepts of customer, potential customer, visitor, employee candidate, shareholder and board member, real persons in institutions we cooperate with and third persons related to these persons within the scope of this Policy.

#### **Personal data Category | Description**

##### **Customer**

Legal persons who use or have used the products and services offered by our Company, regardless of whether they have any contractual relationship with our Company

##### **Potential Customer**

Legal persons who have requested or shown interest in using our products and services or who have been evaluated, in accordance with commercial custom and the rule of honesty, as possibly having such interest

**Visitor**

Natural persons or legal persons who have entered the physical premises owned by our Company for various purposes or visited our websites

**Third Person**

Third party natural persons related to the aforementioned persons in order to ensure the commercial transaction security between our Company and the parties mentioned above or to protect the rights of the aforementioned persons and provide benefits (e.g. Guarantor, Companion, Family Members and relatives) or other natural persons not within the scope of this policy and our Company Employees Personal Data Protection and Processing Policy

**Employee Candidate**

Natural persons who have applied for a job to our Company by any means or opened their resume and related information to our company's review

**Company Shareholder**

Natural persons and Legal Persons who are shareholders of our Company

**Company Official**

Board members of our Company and other authorized natural persons

**Employees, Shareholders and Officials of Institutions We Cooperate With**

Natural persons, including employees, shareholders and officials of institutions with which our Company has any kind of business relationship (such as business partner, supplier, but not limited to these)

In the table below, the personal data owner categories specified above and which types of personal data of persons within these categories are processed are detailed.

**PERSONAL DATA CATEGORIZATION | DATA OWNER CATEGORY TO WHICH THE RELEVANT PERSONAL DATA RELATES**

Identity Information | Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions We Cooperate With, Third Person

Contact Information | Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions We Cooperate With, Third Person

Location Data | Customer, Employee, Employees of Institutions We Cooperate With

Customer Information | Customer

Family Members and Relatives Information | Customer, Visitor, Employee Candidate, Third Person, Employees, Shareholders and Officials of Institutions We Cooperate With

Customer Transaction Information | Customer

Physical Space Security Information | Visitor, Company Officials, Employees, Shareholders and Officials of Institutions We Cooperate With

Transaction Security Information | Customer, Visitor, Third Person, Company Officials, Employees, Shareholders and Officials of Institutions We Cooperate With

Risk Management Information | Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions We Cooperate With, Third Person

Financial Information | Customer, Employee, Company Shareholder, Company Official, Company Shareholder, Employees, Shareholders and Officials of Institutions We Cooperate With  
Personnel File Information | Employees, Shareholders and Officials of Institutions We Cooperate With

Employee Candidate Information | Employee Candidate, Employees of Institutions We Cooperate With

Employee Transaction Information | Employees of Institutions We Cooperate With

Employee Performance and Career Development Information | Employees of Institutions We Cooperate With

Fringe Benefits and Benefits Information | Employees of Institutions We Cooperate With

Legal Transaction and Compliance Information | Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions We Cooperate With, Third Person

Audit and Inspection Information | Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions We Cooperate With, Third Person

Special Categories of Personal Data | Customer, Employee Candidate, Company Shareholder, Company Official, Employees, Shareholders and Officials of Institutions We Cooperate With  
Marketing Information | Customer, Potential Customer

Request/Complaint Management Information | Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions We Cooperate With, Third Person

## **6. THIRD PARTIES TO WHOM PERSONAL DATA ARE TRANSFERRED BY OUR COMPANY AND PURPOSES OF TRANSFER**

Our Company informs the personal data owner of the person groups to whom personal data are transferred in accordance with Article 10 of the KVK Law.

Our Company may transfer customers' personal data to the person categories listed below in accordance with Articles 8 and 9 of the KVK Law (See Section 3/Title 3.5):

- (i) Our Company's business partners,
- (ii) Our Company's suppliers,
- (iii) Our Company's affiliates,
- (iv) Our Company's Shareholders,
- (v) Legally Authorized public institutions and organizations,
- (vi) Legally authorized private law persons.

The scope of the persons specified above to whom transfer is made and the purposes of data transfer are specified below.

### **Persons to whom Data Transfer Will Be Made | Definition | Purpose of Data Transfer**

**Business Partner** | Defines the parties with whom our Company establishes partnerships for purposes such as sale, promotion and marketing of our Company's products and services, after-sales support, execution of joint customer loyalty programs while carrying out our Company's commercial activities. | Limited only to ensuring the fulfillment of the purposes of establishing the

business partnership within the scope of transactions attributing only legal necessity, limited to legal requirement, for example limited to relevant banks for collection transactions,

**Supplier** | Defines the parties that provide services to our Company on a contractual basis in accordance with our Company's orders and instructions while our Company carries out its commercial activities. | Limited to the purpose of ensuring that services outsourced by our Company from the supplier and necessary for carrying out our Company's commercial activities are provided to our Company.

**Our Affiliates** | The company of which our Company is a shareholder | Limited to ensuring the execution of commercial activities of our Company that require participation of our affiliates

**Our Shareholders** | Our shareholders who are authorized regarding the design of strategies and audit activities related to our Company's commercial activities according to the relevant legislation provisions | Limited to the design of strategies and audit purposes related to our Company's commercial activities according to the relevant legislation provisions

**Legally Authorized Public Institutions and Organizations** | Public institutions and organizations authorized to receive information and documents from our Company according to relevant legislation provisions | Limited to the purpose requested within the legal authority of the relevant public institutions and organizations

**Legally Authorized Private Law Persons** | Private law persons authorized to receive information and documents from our Company according to relevant legislation provisions | Limited to the purpose requested within the legal authority of the relevant private law persons

Transfers carried out by our Company are performed in accordance with the matters regulated in Sections 2 and 3 of the Policy.

## **7. PROCESSING OF PERSONAL DATA BASED ON THE PROCESSING CONDITIONS IN THE LAW AND LIMITED TO THESE CONDITIONS**

### **7.1. PROCESSING OF PERSONAL DATA AND SPECIAL CATEGORIES OF PERSONAL DATA**

#### **7.1.1. Processing of Personal Data**

The personal data owner's giving explicit consent is only one of the legal bases that make lawful processing of personal data possible. Apart from explicit consent, personal data may also be processed in the presence of one of the other conditions written below. The basis of the personal data processing activity may be only one of the conditions specified below, or more than one of these conditions may be the basis of the same personal data processing activity. If the processed data are special categories of personal data; the conditions included below under Title 7.1.2 in this section shall apply.

Although the legal bases for processing personal data by our Company differ, in every kind of personal data processing activity, action is taken in accordance with the general principles specified in Article 4 of Law No. 6698 (See Section 3.1.).

#### **A - Existence of Explicit Consent of the Personal Data Owner**

One of the conditions for processing personal data is the explicit consent of the owner. The explicit

consent of the personal data owner must be disclosed regarding a specific subject, based on information and with free will.

For personal data processing activities (secondary processing) other than the processing purpose regarding the reasons for obtaining personal data (primary processing), at least one of the conditions in (ii), (iii), (iv), (v), (vi) and (vii) of this title is sought; if one of these conditions does not exist, these personal data processing activities are carried out by our Company based on the explicit consent of the personal data owner for these processing activities.

In order for personal data to be processed depending on the personal data owner's explicit consent, explicit consents are obtained from supplier potential customers, customers and visitors through relevant methods.

#### **B - Explicitly Stipulated in Laws**

The personal data of the data owner may be processed lawfully if explicitly stipulated in the law.

#### **C - Inability to Obtain the Explicit Consent of the Relevant Person Due to Actual Impossibility**

In case it is mandatory to process personal data in order to protect the life or bodily integrity of the person himself/herself or another person who is unable to disclose consent due to actual impossibility or whose consent cannot be legally recognized as valid, the personal data of the data owner may be processed.

#### **D - Being Directly Related to the Establishment or Performance of the Contract**

Processing of personal data is possible if it is necessary to process personal data belonging to the parties of a contract, provided that it is directly related to the establishment or performance of a contract.

#### **E - Fulfillment of the Company's Legal Obligation**

The personal data of the data owner may be processed if processing is mandatory for our Company to fulfill its legal obligations as data controller.

#### **F- Publicizing Personal Data by the Personal Data Owner**

If the data owner has made his/her personal data public by himself/herself, the relevant personal data may be processed.

#### **G - Mandatory Data Processing for the Establishment or Protection of a Right**

The personal data of the data owner may be processed if data processing is mandatory for the establishment, exercise or protection of a right.

#### **H - Mandatory Data Processing for the Legitimate Interest of Our Company**

The personal data of the data owner may be processed if data processing is mandatory for the legitimate interests of our Company, provided that it does not harm the fundamental rights and freedoms of the personal data owner.

#### **7.1.2. Processing of Special Categories of Personal Data**

By our Company; if the personal data owner does not have explicit consent, special categories of personal data are processed only in the following cases, provided that adequate measures to be determined by the KVK Board are taken:

(i) Special categories of personal data other than the personal data owner's health and sexual life, in cases stipulated by laws,

(ii) Special categories of personal data relating to the personal data owner's health and sexual life only by persons under obligation of confidentiality or authorized institutions and organizations for the purpose of protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

## **8. PERSONAL DATA PROCESSING ACTIVITIES CARRIED OUT AT BUILDING AND FACILITY ENTRANCES AND INSIDE THE BUILDING/FACILITY, AND WEBSITE VISITORS**

For the purpose of ensuring security, our Company carries out personal data processing activities for security camera monitoring in our Company buildings and facilities and tracking guest entry-exits.

Personal data processing activity is carried out by our Company through the use of security cameras and recording guest entry-exits.

Within this scope, our Company acts in accordance with the KVK Law and other relevant legislation.

### **8.1. CAMERA MONITORING ACTIVITY CARRIED OUT AT BUILDING AND FACILITY ENTRANCES AND INSIDE**

In this section, explanations will be made regarding our Company's camera monitoring system and information will be provided on how personal data, privacy and the person's fundamental rights are protected.

Within the scope of security camera monitoring activity, our Company has purposes such as increasing the quality of the service provided, ensuring reliability, ensuring the security of the company, visitors, employees and other persons, and protecting legitimate interests.

#### **8.1.1. Legal Basis of the Camera Monitoring Activity**

The camera monitoring activity carried out by our Company is maintained in accordance with the Law on Private Security Services and relevant legislation.

#### **8.1.2. Conducting Security Camera Monitoring Activity According to KVK Law**

Our Company acts in accordance with the regulations in the KVK Law in conducting camera monitoring activity for security purposes.

Our Company carries out security camera monitoring activities in its buildings and facilities for the purpose of ensuring security, for purposes stipulated in laws and in accordance with the personal data processing conditions listed in the KVK Law.

#### **8.1.3. Announcement of the Camera Monitoring Activity**

Personal data owners are enlightened by our Company in accordance with Article 10 of the KVK Law.

In addition to the general enlightenment it provides (See Section 3/Title 3.3), our Company provides notification regarding camera monitoring activity by multiple methods, also taking into account regulations in the EU and within the scope of GDPR.

Thus, it is aimed to prevent harm to the fundamental rights and freedoms of the personal data owner and to ensure transparency and enlightenment of the personal data owner.

Regarding camera monitoring activity by our Company; this Policy is published on our Company's website (online policy arrangement) and a notification text stating that monitoring will be carried out is posted at the entrances of the areas where monitoring is carried out (on-site enlightenment).

#### **8.1.4. Purpose of Conducting the Camera Monitoring Activity and Limitation to Purpose**

Our Company processes personal data in a manner relevant, limited and proportionate to the purpose for which they are processed, in accordance with Article 4 of the KVK Law.

The purpose of maintaining video camera monitoring activity by our Company is limited to the purposes listed in this Policy. Accordingly, the monitoring areas of security cameras, their number and when monitoring will be carried out are implemented sufficiently to achieve the security purpose and limited to this purpose. Areas that may result in interference exceeding security purposes with the person's privacy (for example, toilets) are not subjected to monitoring.

#### **8.1.5. Ensuring the Security of the Obtained Data**

In accordance with Article 12 of the KVK Law, our Company takes the necessary technical and administrative measures to ensure the security of personal data obtained as a result of camera monitoring activity. (See Section 2/Title 2.1)

#### **8.1.6. Retention Period of Personal Data Obtained Through Camera Monitoring Activity**

Detailed information regarding the retention period of personal data obtained by our Company through camera monitoring activity is included in Article 4.3 of this Policy titled Retention Periods of Personal Data.

#### **8.1.7. Who Can Access the Information Obtained as a Result of Monitoring and To Whom This Information Is Transferred**

Access to records recorded and preserved in digital environment is available only to a limited number of company employees in mandatory cases with management approval. Live camera images can be watched by security officers. The limited number of persons who have access to the records declare by confidentiality undertaking that they will protect the confidentiality of the data they access.

### **8.2. TRACKING OF GUEST ENTRY-EXITS CARRIED OUT AT BUILDING AND FACILITY ENTRANCES AND INSIDE**

Through texts posted within the Company or otherwise made available to visitors, such personal data owners are enlightened within this scope. Visitor entry-exit tracking is carried out and processed only for the purpose of ensuring security, and the relevant personal data are recorded in the data recording system in physical environment.

### **8.3. STORAGE OF RECORDS REGARDING INTERNET ACCESS PROVIDED TO OUR VISITORS/GUESTS IN ITS BUILDINGS AND FACILITIES**

For ensuring security and for the purposes stated in this Policy; our Company may provide internet access to visitors who request it during the time you stay in our Building. In this case, log records regarding your internet access are recorded pursuant to the provisions of Law No. 5651 and the legislation issued according to this Law; these records are processed only if requested by authorized

public institutions and organizations or in order to fulfill our relevant legal obligation in audit processes to be carried out within the Company.

Within this framework, access to the obtained log records is available only to a limited number of our company employees and the IT unit located at our center. Company employees who have access to the aforementioned records access these records only to use them in requests from authorized public institutions and organizations or in audit processes and share them with legally authorized persons. The limited number of persons with access to the records declare by confidentiality undertaking that they will protect the confidentiality of the data they access.

#### **8.4. WEBSITE VISITORS**

On our Company's website; in order to ensure that persons visiting this site carry out their visits on the site in a manner appropriate to their visit purposes; to be able to show them customized content and despite carrying out online advertising activities, it does not record internet movements by technical means.

### **9. SECTION 9 – CONDITIONS FOR DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA**

#### **9.1. OBLIGATION TO DELETE, DESTROY AND ANONYMIZE PERSONAL DATA**

As regulated in Article 138 of the Turkish Penal Code and Article 7 of the KVK Law, although processed in accordance with relevant legal provisions, if the reasons requiring processing cease to exist, personal data are deleted, destroyed or anonymized upon the Company's own decision or upon the request of the personal data owner. Within this scope, our Company fulfills its relevant obligation by the methods explained in this section.

#### **9.2. TECHNIQUES FOR DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA**

##### **9.2.1. Techniques for Deletion and Destruction of Personal Data**

Although processed in accordance with relevant legal provisions, if the reasons requiring processing cease to exist, our Company may delete or destroy personal data upon its own decision or upon the request of the personal data owner. The deletion or destruction techniques most used by our Company are listed below:

##### **(i) Physical Destruction**

Personal data may also be processed by non-automatic means, provided that it is part of any data recording system. While deleting/destroying such data, the system of physically destroying the personal data in a way that it cannot be used later is applied.

##### **(ii) Secure Deletion from Software (Secure Deletion Software)**

While deleting/destroying data processed by fully or partially automatic means and stored in digital environments; methods regarding deletion of the data from the relevant software in a way that it cannot be recovered again are used.

##### **(iii) Secure Deletion by Specialist (Sending to a Specialist for Secure Deletion)**

Our Company may in some cases agree with a specialist to delete personal data on its behalf. In this case, personal data are securely deleted/destroyed by the specialist in a way that they cannot be recovered again.

### **9.2.2. Techniques for Anonymizing Personal Data**

Anonymization of personal data means rendering personal data incapable of being associated with an identified or identifiable natural person in any way whatsoever, even by matching with other data. Our Company may anonymize personal data when the reasons requiring the processing of personal data lawfully processed cease to exist.

In accordance with Article 28 of the KVK Law; anonymized personal data may be processed for purposes such as research, planning and statistics. Such processing is outside the scope of the KVK Law and the explicit consent of the personal data owner will not be sought. Since personal data processed by anonymization are outside the scope of the KVK Law, the rights regulated in Section 10 of the Policy shall not be valid for these data.

The anonymization techniques most used by our Company are listed below:

#### **(i) Masking**

Data masking is the method of anonymizing personal data by removing the basic identifying information of the personal data from the data set.

#### **(ii) Aggregation**

With the data aggregation method, many data are aggregated and personal data are rendered incapable of being associated with any person.

#### **(iii) Data Derivation**

With the data derivation method, a more general content is created from the content of the personal data and it is ensured that personal data cannot be associated with any person.

#### **(iv) Data Shuffling (Data Shuffling, Permutation)**

With the data shuffling method, the values in the personal data set are mixed and the connection between values and persons is severed.

## **10. RIGHTS OF PERSONAL DATA OWNERS; METHODOLOGY FOR EXERCISE AND EVALUATION OF THESE RIGHTS**

Our Company notifies the personal data owner of his/her rights in accordance with Article 10 of the KVK Law, guides the personal data owner on how to use these rights, and our Company carries out the necessary channels, internal functioning, administrative and technical arrangements in accordance with Article 13 of the KVK Law for the evaluation of personal data owners' rights and providing the necessary information to personal data owners.

### **10.1 RIGHTS OF THE DATA OWNER AND EXERCISE OF THESE RIGHTS**

#### **10.1.1. Rights of the Personal Data Owner**

Personal data owners have the rights listed below:

- (1) To learn whether personal data is processed,
- (2) To request information if personal data has been processed,
- (3) To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- (4) To know the third parties to whom personal data is transferred domestically or abroad,
- (5) To request correction of personal data if it is incomplete or incorrectly processed and to request notification of the transaction made within this scope to third parties to whom personal data has

been transferred,

(6) To request deletion or destruction of personal data in case the reasons requiring processing have ceased to exist, although processed in accordance with the KVK Law and other relevant legal provisions, and to request notification of the transaction made within this scope to third parties to whom personal data has been transferred,

(7) To object to the emergence of a result against the person himself/herself by analyzing the processed data exclusively through automated systems,

(8) To request compensation for the damage in case of damage due to unlawful processing of personal data.

### **10.1.2. Cases Where the Personal Data Owner Cannot Assert His/Her Rights**

Pursuant to Article 28 of the KVK Law, since the following cases are excluded from the scope of the KVK Law, personal data owners cannot assert the rights listed in 10.1.1. on these matters:

(1) Processing personal data for purposes such as research, planning and statistics by anonymizing them with official statistics.

(2) Processing personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public safety, public order, economic security, privacy of private life or personal rights, or constitute a crime.

(3) Processing personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law for ensuring national defense, national security, public safety, public order or economic security.

(4) Processing personal data by judicial authorities or execution authorities regarding investigation, prosecution, trial or execution proceedings.

Pursuant to Article 28/2 of the KVK Law; in the cases listed below, personal data owners cannot assert the other rights listed in 10.1.1., except the right to request compensation for damage:

(1) Personal data processing is necessary for prevention of crime or criminal investigation.

(2) Processing of personal data made public by the personal data owner himself/herself.

(3) Personal data processing is necessary for the execution of supervisory or regulatory duties and disciplinary investigation or prosecution by authorized public institutions and organizations and professional organizations in the nature of public institutions based on the authority granted by law.

(4) Personal data processing is necessary for the protection of the State's economic and financial interests regarding budget, tax and financial matters.

### **10.1.3. Exercise of the Personal Data Owner's Rights**

Personal data owners will be able to submit their requests regarding the rights listed under Title 10.1.1. of this section to our Company free of charge by the method specified below:

1 - By clearly stating their requests in a petition or by filling out the KVKK Application Form that they can obtain from our company or our website, and sending the wet-signed version by registered return receipt mail or through Notary channel

FOR OUR COMPANY;

**UZ. DR. ENDER VARDAR**

Teşvikiye, Vali Konağı Cd. No:88 / 2, 34365 Şişli/İstanbul

2- By filling out the KVKK Application Form that they can obtain from our company or our official website and clearly stating their requests, after signing it with your “secure electronic signature” within the scope of the Electronic Signature Law No. 5070,

3 – By filling out the KVKK Application Form and applying in person to the facility where service is received with the wet-signed copy.

It is not possible for third parties to make requests on behalf of personal data owners.

For a person other than the personal data owner himself/herself to make a request, there must be a special power of attorney issued by the personal data owner in the name of the person who will apply.

In the application that personal data owners will make in order to use their rights, “Pursuant to the Personal Data Protection Law No. 6698, to be Made by the Relevant Person (Personal Data Owner) to the Data Controller only the above 2 methods will be used.

#### **10.1.4. Right of the Personal Data Owner to Complain to the KVK Board**

Pursuant to Article 14 of the KVK Law, in case the application is rejected, the response given is found insufficient, or no response is given to the application in due time, the personal data owner may complain to the KVK Board within thirty days from the date he/she learns of our Company’s response and in any case within sixty days from the application date.

### **10.2. RESPONDING TO APPLICATIONS WITHIN THE SCOPE OF KVKK AND GDPR**

#### **10.2.1. Procedure and Period for Our Company to Respond to Applications**

If the personal data owner submits his/her request to our Company in accordance with the procedure set out in the section titled 10.1.3. of this section, our Company will finalize the relevant request free of charge as soon as possible and at the latest within thirty days depending on the nature of the request.

However, if the transaction requires an additional cost, the fee in the tariff determined by the KVK Board will be charged by our Company from the applicant. **10.2.2. Information Our Company May Request from the Applicant Personal Data Owner** Our Company may request information from the relevant person in order to determine whether the applicant is the personal data owner.

Our Company may ask questions to the personal data owner regarding his/her application in order to clarify the matters included in the personal data owner’s application.

#### **10.2.3. Our Company’s Right to Reject the Personal Data Owner’s Application**

Our Company may reject the application of the applicant by explaining its justification in the cases listed below:

- (1) Processing personal data for purposes such as research, planning and statistics by anonymizing them with official statistics.
- (2) Processing personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public safety, public order, economic security, privacy of private life or personal rights, or constitute a crime.
- (3) Processing personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law for ensuring national defense, national security, public safety, public order or economic security.

- (4) Processing personal data by judicial authorities or execution authorities regarding investigation, prosecution, trial or execution proceedings.
- (5) Personal data processing is necessary for prevention of crime or criminal investigation.
- (6) Processing of personal data made public by the personal data owner himself/herself.
- (7) Personal data processing is necessary for the execution of supervisory or regulatory duties and disciplinary investigation or prosecution by authorized public institutions and organizations and professional organizations in the nature of public institutions based on the authority granted by law.
- (8) Personal data processing is necessary for the protection of the State's economic and financial interests regarding budget, tax and financial matters.
- (9) There is a possibility that the personal data owner's request may prevent the rights and freedoms of other persons
- (10) Requests requiring disproportionate effort have been made.
- (11) The requested information is publicly available information.

## **11. – RELATIONSHIP OF THE COMPANY PERSONAL DATA PROTECTION AND PROCESSING POLICY WITH OTHER POLICIES**

The fundamental policies drafted on the protection and processing of personal data, to which the principles set forth by the Company in this Policy are related, are stated below. By linking these policies also with the fundamental policies carried out by the Company in other fields, harmonization is also ensured between processes operated by the Company with different policy principles for similar purposes. Some of the policies used within our Company are for internal Company use. The principles of internal Company policies are reflected in public policies to the extent relevant, aiming to ensure that relevant persons are informed within this framework and transparency and accountability regarding the personal data processing activities carried out by the Company are ensured.

## **12. COMPANY PERSONAL DATA PROTECTION AND PROCESSING POLICY GOVERNANCE STRUCTURE**

Within the Company, by decision of the Company senior management, a "Personal Data Protection Committee" has been established to manage this policy and other policies connected and related to this policy (See Section 11). The duties of this committee are stated below.

- To prepare and submit the fundamental policies related to Personal Data Protection and Processing for the approval of senior management in order to put them into force.
- To decide how the implementation and audit of policies regarding Personal Data Protection and Processing will be fulfilled and within this framework to submit matters of internal company assignments and coordination for the approval of senior management.
- To identify the matters that need to be done to ensure compliance with the Personal Data Protection Law and relevant legislation and to submit what needs to be done for the approval of senior management; to supervise implementation and ensure coordination thereof.
- To increase awareness regarding Personal Data Protection and Processing within the Company and before institutions with which the Company cooperates.
- To identify risks that may arise in the Company's personal data processing activities and ensure that necessary measures are taken; to submit improvement recommendations for the approval of senior management.

- To design trainings regarding protection of personal data and implementation of policies and ensure their execution.
- To decide on the applications of personal data owners at the highest level.
- To coordinate the execution of information and training activities in order to ensure that personal data owners are informed about personal data processing activities and legal rights.
- To prepare changes in the fundamental policies related to Personal Data Protection and Processing and submit them for the approval of senior management in order to put them into force.
- To follow developments and regulations on Personal Data Protection; to make recommendations to senior management on what needs to be done within the Company in accordance with these developments and regulations.
- To coordinate relations with the Personal Data Protection Board and Authority.
- To perform other duties to be assigned by the Company senior management regarding the protection of personal data

## ANNEX-1 DEFINITIONS

**Explicit Consent:** Consent disclosed regarding a specific subject, based on information and with free will

**Anonymization:** It is changing personal data in such a way that it loses its personal data nature and this situation cannot be reversed. E.g.: rendering personal data unrelatable to a real person by techniques such as masking, aggregation, data distortion, etc.

**Employee Candidate:** Natural persons who have applied for a job to our Company by any means or opened their Resume and related information to our company's review **Employees,**

**Shareholders and Officials of Institutions We Cooperate With:** Natural persons, including employees, shareholders and officials of institutions with which our Company has any kind of business relationship (such as business partner, supplier, but not limited to these)

**Processing of Personal Data:** Any operation performed on data such as obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by fully or partially automatic means or non-automatic means provided that they are part of any data recording system.

**Personal Data Owner:** Natural person whose personal data are processed.

For example; Customers and employees. **Personal Data** Any information relating to an identified or identifiable natural person. Therefore, processing of information relating to legal persons is not within the scope of the Law. For example; name-surname, TCKN, e-mail, address, date of birth, credit card number etc.

**Visitor:** Real and legal persons who use or have used the products and services offered by our Company regardless of whether they have any contractual relationship with our Company.

**Special Categories of Personal Data:** Race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing and attire, membership of associations foundations or trade unions, health, sexual life, criminal convictions and data related to security measures, and biometric and genetic data are special categories of data.

**Potential Customer:** Natural persons who have requested or shown interest in using our products and services or who have been evaluated, in accordance with commercial custom and the rule of

honesty, as possibly having such interest

**Company Shareholder:** Natural persons who are shareholders of our Company

**Company Official:** Board members of our Company and other authorized natural persons

**Third Person:** Third party natural persons related to the aforementioned persons in order to ensure the commercial transaction security between our Company and the parties mentioned above or to protect the rights of the aforementioned persons and provide benefits (e.g. Guarantor, Companion, Family Members and relatives)

**Data Processor:** Natural and legal person who processes personal data on behalf of the data controller based on the authorization given by the data controller. For example, the cloud computing company that stores your Company's data

**Data Controller:** The person who determines the purposes and means of processing personal data and manages the place where data are systematically kept (data recording system) is the data controller.

**Visitor:** Natural persons who have entered the physical premises owned by our Company for various purposes or visited the internet sites

## **ANNEX-2 IMPORTANT DATES IN TERMS OF THE APPLICATION OF THE KVK LAW**

### **7 April 2016**

As of 7 April 2016, our Company acts in accordance with the following obligations:

- (i) General rules and principles regarding the processing of personal data
- (ii) Obligations regarding the enlightenment of personal data owners
- (iii) Obligations regarding ensuring data security

### **7 October 2016**

As of 7 October 2016, the regulations listed below entered into force and our Company acts in accordance with these regulations:

- Provisions regarding transfer of personal data to third parties and abroad
- Regulations regarding the personal data owner, who is the owner of personal data, exercising his/her rights against our Company (learning whether his/her personal data are processed, requesting information, learning the persons to whom data are transferred, requesting correction) and complaining to the KVK Board.

### **7 April 2017**

Consents lawfully obtained before 7 April 2016 shall be accepted as compliant with the KVK Law as of 7 April 2017 unless the personal data owner makes a statement to the contrary.

(vii) As of 7 April 2017, Regulations regarding the KVK Law will enter into force and our Company will act in accordance with these regulations.

### **7 April 2018**

Personal data processed before 7 April 2016 shall be made compliant with the KVK Law by our Company until 7 April 2018 or shall be deleted or anonymized.

## **ANNEX-3 PROCESSING OF PERSONAL DATA OF EMPLOYEE CANDIDATES AND BUSINESS PARTNER EMPLOYEES**

### **PERSONAL DATA OWNER | COLLECTION AND PROCESSING OF PERSONAL DATA | EXERCISE OF RIGHTS AND APPLICATION**

**Employee Candidates** | The personal data collected during the recruitment process of employee candidates and the special categories of personal data collected according to the nature of the job are processed by our Company for the purposes stated in Sections 4.2 and 7 of the Policy and listed below:

- To evaluate the candidate's qualifications, experience and interest and suitability for the open position,
- If necessary, to check the accuracy of the information submitted by the candidate or to contact third parties and research the candidate,
- To contact the candidate about the application and recruitment process or, if appropriate, to contact the candidate later for any position opened domestically or abroad,
- To meet the requirements of the relevant legislation or the requests of the authorized institution or organization,
- To develop and improve the recruitment principles implemented by our Company. Personal data of employee candidates may be collected by the following methods and means:
  - Digital application form published in written or electronic environment;
  - Resumes sent by candidates to our company by e-mail, cargo, reference and similar methods,
  - Employment or consultancy companies;
  - During the interview, in cases where interviews are conducted face-to-face or by means such as video conference, telephone,
  - Checks performed to verify the accuracy of the information provided by the candidate and research conducted by our company,
  - Recruitment tests conducted by experienced specialists and whose results are examined, identifying talent and personality traits. | Employee candidates, as data owners, will also be able to submit their requests regarding their rights to our Company by the method explained in Section 10 of this Policy.

**Employees of Business Partners** | Our Company may process personal data regarding employees of business partners within the scope of fulfilling the commercial activities established with business partners, within the purposes explained in Section 4.2 and Section 7 of the Policy. | Employee candidates, as data owners, will be able to submit their requests regarding their rights to our Company by the method explained in Section 10 of this Policy. They will be able to submit to our Company by the method explained in Section 10 of this Policy.

