

RELY ON EXCELLENCE

## PERSONAL DATA PROTECTION ONLY

**1. Legal Basis:** Arranged in article 20 of the Constitution; everyone has the right to demand protection of personal data about him, this right; According to Law No. 6698 on the basis of the Law on the Protection of Personal Data, based on the basic legal basis that the person is informed about personal data about himself, accessing this data, requesting correction or deletion of it, and learning whether it is used for its purposes, and that personal data can only be processed in cases stipulated by the law or with the express consent of the person. We attach utmost importance to the protection and processing of Personal Data in accordance with the law and we act with this care in all our planning and activities. As a company, we take all administrative and technical measures for the protection and processing of Personal Data, which is the basis of privacy, and inform our staff about the legal sanctions regulated in Article 135 of Turkish Penal Code (TCK) and the following.

**2. Purpose:** With the Law No. 6698 on Protection of Personal Data in force, in the processing of personal data, the protection of fundamental rights and freedoms of individuals, especially the privacy of private life, and the obligations and procedures and principles to be followed by real and legal persons who process personal data. The purpose of our policy, which is prepared by taking into consideration the said regulation; To ensure compliance with the obligations regarding the protection of personal data, to evaluate the issues related to the processing, transfer and protection of the information provided within the scope of the activities carried out by our Company with a risk-based approach, and to raise awareness of the employees of the institution by determining the strategies, internal controls and measures, rules of operation and responsibilities. Same time; Our aim is to ensure transparency by informing our customers, potential customers, employees, candidates for employees, Company shareholders, Company officials, visitors, employees, shareholders and officials of the institutions / organizations with which we cooperate, and those whose personal data are processed by our Company.

**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 third parties that we cooperate, and are processed automatically by non-automated means provided that they are part of any data recording system.

### 4. Definitions

- 4.1. Explicit Consent Consent, which is based on information about a particular subject and declared with free will.
- 4.2. Anonymizing It is the change of personal data so that it can be attributed to someone whose identity is identifiable or identifiable and that this situation cannot be undone. Example: Masking, aggregation, data corruption, etc. making techniques and personal data unrelated to a real person.
- 4.3. People working in the company in accordance with the employment contract that has been made with the employee company
- 4.4. Candidate for Employees The Company is either a person who has applied for a job by any means or who has opened his CV and related information for the review of the Company.

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4.5. Employees, Shareholders and Authorities of the Institutions We Cooperate With: Real persons, including the shareholders and officials of these institutions, who work in the institutions with which the Company has all kinds of business relations (such as, but not limited to, partners, suppliers)

4.6. Processing of Personal Data: Obtaining, saving, storing, preserving, modifying, reorganizing, disclosing, transferring, taking over, making it available, which is completely or partially automated or non-automated provided that it is part of any data recording system, any action taken on data, such as its classification or inhibition of its use.

4.7. Personal Data Owner Real person whose personal data is processed. For example; Customers and employees.

4.8. Any information relating to a specific or identifiable natural person whose Personal Data ID is determined The processing of information about legal persons is not covered by the law. For example; name-surname, TC, e-mail, address, date of birth, credit card number, etc.

4.9. Regardless of whether the customer has any contractual relationship with the Company, real persons who use or have used the products and services offered by the Company

4.10. Personal Data with Special Qualities: Race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, disguise, association foundation or union membership, health, sexual life, criminal conviction and security measures and biometric and genetic data are special quality data.

4.11. Potential Customer Real persons who have requested or are interested in using our products and services, or have been evaluated in accordance with the rules of business practice and integrity that they may have.

4.12. Company Shareholder: The shareholder of the company is natural persons

4.13. Company Official: Company's board member and other authorized natural persons

4.14. Third Party Third party natural persons (eg family members and relatives) associated with such persons in order to ensure the commercial security of the