



**DOKU TURİZM OTELCİLİK İNŞAAT SAĞLIK TARIM
GIDA YATIRIMLARI ANONİM ŞİRKETİ**

**PERSONAL DATA PROCESSING AND
PROTECTION POLICY**

ANTALYA 2023

(Effective Date: 01/03/2023)

As Mylome Luxury Hotel & Resort, we offer an unforgettable holiday experience to our valued guests with our award-winning architecture, our private beach hidden in the most beautiful bay of Alanya and our swim-up rooms on the floors.

On the other hand, we are aware that compliance with legislation and best practices is of great importance, at least as much as success in our main activities.

The processing of personal data related to our employees, guests, suppliers and all the stakeholders in accordance with the law undoubtedly has an important place in terms of compliance with the best management practices, as well as being required by legislation.

In this context, we consider the preparation of a comprehensive and systematic policy document on the personal data we collect and process during our activities and placing it among our Company management documents to be an important component of our participatory and horizontal management approach, which is based on mutual trust, effective communication and teamwork with our solution partners in the range from our employees to our suppliers.

With this document, the Personal Data Processing and Protection Policy of our Company, which we have prepared within the framework of the Personal Data Protection Law No. 6698 and the relevant secondary regulations, is determined.

The adoption of this policy text by our Company and the establishment of the Personal Data Monitoring Committee is an indication that we have fulfilled our legal obligations arising from the Personal Data Protection Law and the relevant legislation, and also completed the procedures related to the processing of personal data and implemented the necessary certification system.

Besides all these facts, we would like to clearly express our determination to keep alive the quality of this policy text, which is an important component of our Company's personal data processing policy, by reviewing it at certain intervals depending on developments in legislation and needs, which responds to needs and sheds light on business and transactions.

Best regards.

**DOKU TURİZM OTELCİLİK İNŞAAT
SAĞLIK TARIM GIDA YATIRIMLARI A.Ş.**

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1. IN GENERAL, THE TEXT OF THE PERSONAL DATA PROCESSING AND STORAGE POLICY

With the Text of our Company's Personal Data Processing and Protection Policy ("Policy Text"), we aim:

- 1- Fulfilling the legal obligations arising from the Law on the Protection of Personal Data ("KVKK") and the relevant legislation,
- 2- Implementation of the prescribed practices related to the processing of personal data
- 3- Creating internal awareness about the processing of personal data and ensuring its continuity

And it is envisaged that this will be made an important component of our Company's holistic perspective management approach aimed at total quality.

1.1.Objectives of the Policy Text

The Policy Text develops the management approach prevailing in our Company within the framework of personal data protection law; in this context, our Company sets out the rights and obligations of personnel, guests, suppliers, visitors, employees and other related persons regarding personal data, the works and transactions to be performed by our Company in this regard, the principles of using the rights of related persons in a collective, consistent and systematic way.

The Policy Text has been prepared to achieve the following objectives:

- 1- Fulfillment of the obligation contained in the KVKK and related legislation,
- 2- Collective disclosure of company's position on the processing and protection of personal data of our company,
- 3- Creation of a guide regarding the processing of personal data that our company will encounter during the continuation of its activities,
- 4- Making the processing and protection of personal data a part of the Company's management,
- 5- Introduction of a regulation on the updating of these principles, which have become part of the company's management, in order to adapt to changes and innovations.

1.2.Technical Expressions

The legal expressions contained in this Policy Text have been used in the scope and content in which they are used in the KVKK and related legislation.

1.3.Principles

This Policy Text has been prepared based on the following 5 principles contained in article 4/2 of KVKK:

- 1- Compliance with the law and the rule of honesty,
- 2- Accuracy and timeliness,
- 3- Processing for specific, clear and legitimate purposes,
- 4- Processing of data in a limited and measured manner in connection with the purpose for which they are processed,
- 5- Processing limited to the period stipulated by the provisions of the legislation or required by the purpose of processing.

Our company bases its practices regarding the processing of personal data on the legislation and these 5 principles. Especially in cases where there is no clarity in the legislation or where there is hesitation in the application, our Company will guide its application within the framework of these principles after conducting the necessary examinations and researches within the framework of the care made possible by the conditions.

The Text of the Personal Data Storage and Disposal Policy contained in the management documents of our Company is a text that sets out the policy based on the process of determining the maximum period required for the purpose for which personal data are processed, as well as the process of deletion, disposal and anonymization, and is a complement to this Policy Text.

The principles related to this text, which we will briefly call the "disposal policy text", are as follows:

- a) The personal data, the processing conditions of which are completely eliminated, are destroyed ex officio or upon the request of the person concerned.
- b) The company will follow the principles contained in article 5 of KVKK as well as other relevant legislative provisions and the principles contained in the disposal policy text.
- c) All transactions related to the disposal of personal data are recorded and these records are stored for at least three years.
- d) Unless otherwise stipulated regarding the method of disposal of personal data, our Company selects the most appropriate method by taking into account the request of the concerned person, if any, and explains its reasons.

2. CONDITIONS OF PROCESSING PERSONAL DATA

2.1.In General

The company shall process the personal data according to following conditions as per article 5 of KVKK:

- i. The personal data collected by the company shall be processed only if there is express consent.
- ii. Even if the company does not have the express consent of the concerned person, personal data may still be processed in following cases stipulated by article 5/2 of KVKK.
 1. Express stipulation in the law.
 2. Being made public by the person concerned.
 3. It is necessary to process the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract.
 4. It is mandatory for our company to fulfill its legal obligations.
 5. Data processing is mandatory for the establishment, exercise or protection of a right.
 6. Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.
 7. Article 5/2 of KVKK stipulates that the company can process personal data of an individual that can't express his/her consent due to a physical handicap or whose consent is not legally accepted, or in case that processing is necessary to maintain physical integrity or life of a person (article 5/2.b). This condition is more general and more comprehensive than the other conditions and does not seem to be applicable for our Company specifically considering the fields of activity of our Company, the personal data it collects and the way it processes them. However, it should be stated that this situation, even if it is very exceptional, may take place within the conditions of the processing of personal data by our Company, even if there is no explicit consent.

2.2. Conditions of Processing Personal Data of a Special Nature

For the processing of personal data of a special nature, it is necessary to obtain the explicit consent of the concerned person. However, in the following cases, personal data of a special nature may be processed by our Company without seeking explicit consent:

- i. When personal data except for medical and sexual life are concerned, it may be processed in cases stipulated by the laws,
- ii. When we are obliged by the law to keep secret but to process data in order to plan and manage healthcare services and to perform protective healthcare, medical diagnosis, treatment and care services in addition to the protection of public health when data concerning medical and sexual life are concerned.

According to article 6/1 of KVKK, data of special nature is defined as data related to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, disguise and dress, membership to associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, biometric and genetic data.

The processing of personal data of a special nature in the normal functioning of our company related to the main subjects of activity is a rare occurrence. However, explicit consent is obtained from the data owner in cases where it is necessary to process such personal data.

It is of course that the measures determined by the Personal Data Protection Authority ("KVK Authority") will also be taken in the processing of personal data of a special nature.

3. BASIC INFORMATION ABOUT THE PERSONAL DATA PROCESSED BY OUR COMPANY

The information in this section is based on the personal data processed by our Company based on the Data Inventory of our Company that has been registered in the Data Controllers Registry Information System within the KVK Institution.

3.1. Categories of Personal Data Collected

Personal data is collected in our company under the following 14 categories:

3.1.1. Identification Data

As in every commercial enterprise, personal data falling into the category of Identity Information is intensively collected and processed by our Company for a wide variety of purposes. Our company collects and processed personal data for the execution of information

security processes, execution of employee candidate / intern/ student selection and placement processes, execution of employee candidate application processes, fulfillment of work contract and regulatory obligations for employees, execution of employee benefits and benefits processes, execution of audit/ ethics activities, execution of training activities, execution of activities in accordance with legislation, execution of finance and accounting affairs, execution of remuneration policy, execution of assignment processes, execution of communication activities, planning of human resources processes, execution / audit of business activities , conducting occupational health/safety activities, conducting business continuity activities, conducting goods/services purchasing processes, conducting goods/services after-sales support services, conducting goods /services after-sales support services, conducting goods /services sales processes, conducting goods / services production and operation processes, conducting customer relationship management processes, organization and event management, conducting performance evaluation processes, conducting advertising / campaign / promotion processes, conducting supply chain management processes, conducting wage policy, conducting product/services marketing processes and talent/ career development, providing information to authorized persons, institutions and organizations, creating and tracking visitor records.

3.1.2. Contact Data

The personal data in the category of contact information are the personal data that are of great importance at every stage for the continuation of the activities of our Company directly. It is necessary that this information is accurate and up-to-date. Contact data in our company is processed for the execution of employee candidate / trainee / student selection and placement processes, execution of employee candidate application processes, fulfillment of work contract and regulatory obligations for employees, execution of benefits and benefits processes for employees, execution of activities in accordance with legislation, execution of finance and accounting works, execution of assignment processes, execution of communication activities, planning of human resources processes, execution / supervision of business activities, execution of goods / services after-sales support services, goods / services sales services, customer relationship management processes, conducting advertising / campaign/ promotion processes, conducting supply chain management processes, providing information to authorized persons, institutions and organizations.

3.1.3. Personal Data

In our company, the personal information of our employees is processed for the purposes of conducting employee candidate / trainee/ student selection and placement processes, conducting employee candidate application processes, fulfilling work contract and regulatory obligations for employees, conducting employee benefits and benefits processes, conducting activities in accordance with legislation, conducting assignment processes, planning human resources processes, conducting / auditing business activities, providing information to authorized persons, institutions and organizations.

3.1.4. Legal Process Information

In our company, the legal transaction information of our employees is collected and processed for the purpose of fulfilling the obligations arising from the employment contract and legislation for employees, conducting activities in accordance with the legislation, tracking and conducting legal affairs, conducting finance and accounting affairs.

3.1.5. Physical Space Security Data

Personal data is collected 24/7 with the existing camera security system for the purpose of providing physical venue security, creating and tracking visitor records, conducting audit/ethical activities, conducting management activities in our company.

3.1.6. Transaction Security Data

In our company, access to the Internet is provided. The IP addresses, user names and passwords of our employees, guests and visitors who use this facility are logged in a specific system and collected and processed for the purpose of conducting information security processes and conducting audit/ ethical activities.

3.1.7. Financial Data

As it is known, ensuring that payments continue in a predictable and uninterrupted manner during commercial activity is the most important element for the sustainability of any business. Our Company collects and processes financial information from Company partners, employees, guests and supplier officials. Our company processes this financial information for the purpose of conducting goods/services sales processes, fulfilling obligations arising from business contracts and legislation for employees, conducting activities in accordance with legislation, conducting finance and accounting affairs, conducting / auditing business activities, conducting goods /services after-sales support services, conducting customer

relationship management processes, conducting wage policy, conducting product/services marketing processes.

3.1.8. Professional Experience Data

Professional experience data related to the employee, employee candidate, supplier official / employee is processed in our company. Such data is collected and processed for the execution of employee candidate / trainee / student selection and placement processes, execution of employee candidate application processes, fulfillment of work contract and regulatory obligations for employees, execution of employee benefits and benefits processes, execution of training activities, execution of activities in accordance with legislation, execution of assignment processes, planning of human resources processes, execution / supervision of business activities, execution of occupational health/ safety activities, execution of goods / services purchasing processes, execution of supply chain management processes, execution of salary policy, ability / career development activities for the purpose of providing information to authorized persons, institutions and organizations.

3.1.9. Audio and Visual Recordings

Audio and visual records of persons who work in our company, the supplier representatives/ employees, the guests / the product or the service recipients are kept by the company. In our company, audio and visual recordings are taken for the purpose of conducting / auditing business activities, conducting goods / service sales processes, conducting product / service marketing processes, advertising / campaign / promotion processes.

3.1.10. Health Data

Personal data falling into the category of Health Data are special categories of personal data. The company collects such data for the execution of employee candidate / trainee / student selection and placement processes, execution of employee candidate application processes, fulfillment of work contract and regulatory obligations for employees, execution of benefits and benefits processes for employees, execution of audit / ethical activities, execution of training activities, execution of activities in accordance with legislation, execution of assignment processes, planning of human resources processes, execution / supervision of business activities, execution of occupational health and safety activities, execution of goods / services after-sales support services, production and operation of goods / services, conducting customer relationship management processes, organization and event management, conducting contract processes, and providing information to authorized persons, institutions

and organizations. Explicit consent is obtained from the employees whose personal data are taken in this category.

3.1.11. Data about Criminal Convictions and Security Measures

The personal data that fall under the category of Criminal Conviction and Security Measure are personal data of a special nature. In our company, criminal conviction and security measure data of our employees are collected and processed physically in order to provide information to authorized persons, institutions and organizations, fulfill business contractual and regulatory obligations for employees, conduct side rights and benefits processes for employees, plan human resources processes, conduct assignment processes. Explicit consent is obtained from employees for the processing of personal information in this category.

3.1.12. Marketing Data

Cookie records are kept due to mandatory cookies related to the website visitor. These records are processed for the purposes of carrying out information security processes, carrying out advertising / campaign / promotion processes, carrying out marketing processes of products / services.

3.1.13. Transaction Security

As a result of connecting to the internet network of our company, Internet access and log entries are processed for the purposes of conducting information security processes, conducting audit / ethical activities.

3.1.14. Other

Information about the number of children of employees and employee candidates in our company is collected and processed for the purpose of providing information to authorized persons, institutions and organizations, fulfilling work contract and regulatory obligations for employees, conducting side rights and benefits processes for employees, conducting / auditing business activities, conducting activities in accordance with legislation, planning human resources processes, conducting assignment processes, conducting salary policy, conducting employee candidate application processes, selecting and placing employee candidates / trainees / students, planning human resources processes.

3.2.Methods of Collection of Personal Data

In our company, personal data is collected by a total of 7 methods, 3 of which are the main ones listed below:

3.2.1. Physical

- a. Job application form,
- b. Creating a form
- c. Signed Contracts

3.2.2. Information Systems (Electronics)

- a. Uploading the internal applications of the physical information received
- b. By email
- c. Hot-Spot Internet Service Provider
- d. Call Center Service

3.2.3. CCTV

- a. Camera Recordings

3.3. Owners of the Collected Personal Data

The owners of the personal data collected by our company are listed below:

- 1) Employees
- 2) Supplier Employee/Representative
- 3) Employee Candidates
- 4) Guest
- 5) Visitors
- 6) Guest Candidate
- 7) Website Visitors

3.4. The Legal Reason for the Processing of the Collected Personal Data

The personal data collected by our company are processed based on the legal reasons listed below as per article 5 of KVKK. These are:

- 1) Explicit consent of the personal data owner.
- 2) Express stipulation in the law.
- 3) It is necessary to process the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract.
- 4) It is mandatory for our company to fulfill its legal obligations.
- 5) Being made public by the person concerned.
- 6) Data processing is mandatory for the establishment, exercise or protection of a right.

- 7) Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

The personal data of a special nature processed by our company are processed in accordance with Article 6 of KVKK with the explicit consent of the data owner and exclusively for the cases stipulated in the laws.

3.5.The Purposes for Which the Collected Personal Data Are Processed

We consider it sufficient to only count the personal data processing purposes of our Company, which we associate under the categories of personal data above, below:

1. Execution of Information Security Processes
2. Execution of Employee Candidate / Intern / Student Selection and Placement Processes
3. Execution of Application Processes of Employee Candidates
4. Fulfillment of obligations arising from employment contracts and legislation for employees
5. Execution of Ancillary Rights and Benefits Processes for Employees
6. Execution of Audit / Ethics Activities
7. Execution of Educational Activities
8. Conducting Activities in Accordance with the Legislation.
9. Execution of Finance and Accounting Works
10. Ensuring the Security of Physical Space
11. Execution of Assignment Processes
12. Monitoring and Execution of Legal Affairs
13. Execution of Educational Activities
14. Planning of Human Resources Processes
15. Execution /Supervision of Business Activities
16. Occupational Health and Safety
17. Ensuring Business Continuity Conducting Activities
18. Execution of the Purchase Processes of Goods / Services
19. Goods / Services Execution of After-sales Support Services
20. Execution of Goods / Service Sales Processes
21. Execution of Goods / Services Production and Operation Processes
22. Execution of Customer Relationship Management Processes
23. Organization and Event Management
24. Execution of Performance Evaluation Processes

25. Execution of Advertising / Campaign / Promotion Processes
26. Execution of Assignment Processes
27. Execution of Supply Chain Management Processes
28. Execution of the Wage Policy
29. Execution of Marketing Processes of Products / Services
30. Conducting Talent/ Career Development Activities
31. Providing Information to Authorized Persons, Institutions and Organizations
32. Execution of Educational Activities
33. Creation and Tracking of Visitor Records

4. THE TRANSFER OF PERSONAL DATA PROCESSED BY OUR COMPANY AND ITS LEGAL BASIS

As detailed above, personal data is collected by our Company under 14 categories. The transfer cases of this personal data are as follows:

- a) Personal data other than private personal data and judicial record report, health information/ report, disability status and rest reports belonging to our employees and employee candidates, which are private personal data, are transferred to Company partners, legally authorized public institutions and organizations only if necessary. The explicit consent required for the processing of personal data of a special nature within this framework has been obtained from the data owners.

Personal data are transferred by our company based on following cases with legal reasons listed in article 5/2 to which article 8 of KVKK refers:

- 1- Article 5/1: Obtaining explicit consent
- 2- Article 5/2-a: Express stipulation by laws
- 3- Article 5/2-c: Necessity to process the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract.
- 4- Article 5/2-ç: Fulfillment of legal obligation
- 5- Article 5/2-e: Data processing being mandatory for the establishment, use or protection of a right
- 6- Article 5/2-f: Legitimate Interest of the Data Controller

5. STORAGE AND DISPOSAL OF PERSONAL DATA PROCESSED BY OUR COMPANY

5.1.Storage of Personal Data

Our company processes personal data only based on the availability of an actual existing data processing justification. Our company has prepared and accepted a Personal Data Storage and Disposal Policy in accordance with article 5/1 of the Regulation on the Deletion, Disposal or Anonymization of Personal Data that entered into force through publication in the Official Gazette dated 28/10/2017 and numbered 30224 as issued by KVK according to article 7/3 of KVKK.

In general, personal data contained in our company is processed for following purposes;

1. Ability to maintain commercial activities,
2. Ability to fulfill legal obligations,
3. Planning and execution of employee rights and subsidiary rights and creation of a personal file
4. Ability to manage customer relationships,
5. Execution of finance and accounting works

according to KVKK and other legislation.

According to Article 12 of KVKK;

1. Preventing the unlawful processing of personal data,
2. Preventing unlawful access to personal data,
3. Ensuring the preservation of personal data,

Are the main purposes for necessary technical and administrative measures to ensure appropriate security level.

Our company ensures the security of the personal data it holds in accordance with the legislation and the requirements of the situation, mainly by determining a secure physical location, making the appropriate authorization principles operational and taking measures related to personal data in the electronic environment.

These measures, classified under two headings as Administrative Measures and Technical Measures, are as follows:

5.1.1. Administrative Measures

1. There are disciplinary regulations that contain data security provisions for employees.
2. Training and awareness-raising activities are carried out for employees on data security at certain intervals,
3. Corporate policies on access, information security, use, storage and disposal have been prepared and started to be implemented.
4. Confidentiality commitments are made,
5. The signed contracts contain data security provisions,
6. Personal data security policies and procedures have been determined,
7. Personal data security issues are reported quickly,
8. Personal data security is being monitored,
9. Personal data is reduced as much as possible,
10. Periodic and/or random internal audits are carried out and performed,
11. Protocols and procedures for the security of personal data of a special nature have been determined and are being implemented,
12. Regular audit of the service providers processing data is provided on the subject of data security at certain intervals,
13. Data processing service providers are provided with awareness about data security.
14. The Obligation to Inform the Concerned Persons is Being Fulfilled,
15. Information Security Trainings are Provided for Employees,
16. Improving the Quality and Technical Knowledge/Skills of Employees,
17. Prevention of Unlawful Processing of Personal Data,
18. Prevention of Unlawful Access to Personal Data,
19. Ensuring the Preservation of Personal Data,
20. Employees Are Made to Sign Confidentiality Agreements,
21. A Disciplinary Procedure is being Implemented for Employees who Do not Comply with Security Policies and Procedures,

5.1.2. Technical Measures

1. Network security and application security are provided.
2. Security measures are taken within the scope of information technology systems procurement, development and maintenance.
3. The security of the personal data stored in the cloud is ensured.
4. An authority matrix has been established for employees.

5. Access logs are kept regularly.
6. The powers of employees who have changed their duties or have left their jobs in this area are being removed.
7. Current anti-virus systems are used.
8. Firewalls are used.
9. Necessary security measures are taken regarding entry and exit to physical environments containing personal data.
10. The physical environments containing personal data are subject to external risks (fire, flood, etc.) counter security is provided.
11. The security of the environments containing personal data is ensured.
12. The personal data is backed up and the security of the backed up personal data is also ensured.
13. The user account management and authorization control system are being implemented and their monitoring is also being carried out.
14. Log records are kept in such a way that there is no user intervention.
15. The current risks and threats have been identified.
16. Intrusion detection and prevention systems are used.
17. Cyber security measures have been taken and their implementation is constantly monitored.

From the personal data available in our company, personal data related to employee candidates are stored for a maximum of 1 year, username and password information obtained for our employees through the information system is stored for 2 years, log records are stored for 2 years, personal data obtained through camera recordings are stored for 30 days and other personal data are stored for the period determined by legislation or for the existence of legitimate interests of our Company.

Necessary measures have also been taken for the physical security of the personal data held in our company. Those of the personal data in our company that are connected to physical assets are stored in a locked archive located in each unit manager's own room on the basis of activity. Personal data obtained through the information system that is not connected to a physical entity is stored on servers that have been protected with appropriate security measures.

5.2. Disposal of Personal Data

In case the reasons to process personal data as stipulated by article 138 of Turkish Penal Code and article 7 of KVKK have disappeared, then such data is deleted, destroyed or made anonymous upon data owner's request or ex officio.

Our Company deletes, destroys or anonymizes the personal data stored in accordance with the KVKK and secondary legislation and in accordance with the Text of this Policy within the specified periods in accordance with the Personal Data Storage and Disposal Policy in accordance with the request of the concerned person or ex officio if the reasons requiring the processing of the data disappear.

The deletion, disposal and anonymization techniques related to the disposal of personal data by our Company and the procedures to be applied in these matters are included in detail in the Personal Data Storage and Disposal Policy.

6. THE RIGHTS OF THE DATA SUBJECT AND THE EXERCISE OF THESE RIGHTS

Based on article 11 of KVKK, everyone has following rights by applying to our Company;

- a. Learning whether personal data is processed or not,
- b. If personal data has been processed, requesting information about it,
- c. Learning the purpose of personal data and whether they are used in accordance with its purpose,
- d. Knowing the third parties to whom personal data is transferred at home or abroad,
- e. Requesting correction of personal data if it is incomplete or incorrectly processed,
- f. Requesting deletion or disposal of personal data within the framework of the conditions stipulated in article 7,
- g. Requesting notification of the transactions made pursuant to subparagraphs (e) and (f) to third parties to whom personal data has been transferred,
- h. Objecting to the emergence of a result against the person himself by analyzing the processed data only through automatic systems,
- i. Requesting the compensation of the damage in case of loss due to the unlawful processing of personal data.

In order to ensure that the data subject exercises these rights effectively, an internal regulation has been made in our Company regarding the satisfaction of these applications, and information and facilities regarding what these rights are and how they will be used have been

provided both in the explicit consent texts received from interested parties and on the website of our Company. The Company shall respond to such individuals either positively or negatively within 30 days after careful examination of the application of the data subject as per article 13 of KVKK. There will be no charge for these actions.

7. PERSONAL DATA WORKING COMMITTEE

In our company, a Personal Data Monitoring Committee consisting of 2 personnel (human resources and financial affairs) to be determined by the general manager / responsible manager has been established in order to process personal data, monitor legislative changes related to the processing of personal data, submit assessments to management, study activities that can be done to increase awareness of the processing of personal data among our Company employees and make it part of the corporate culture, make the necessary changes and regulations in the management documents enacted on the processing of personal data. If necessary, services will be outsourced for technical knowledge and experience.

8. IMPLEMENTATION AND REVISION OF THE POLICY TEXT

Our company has taken the necessary actions and fulfilled the obligations for compliance with the KVVK and the relevant legislation. In addition, this Policy Text was accepted by the board of directors of our Company on 01/03/2023 and entered into force on 01/03/2023.

Revision proposals deemed necessary to be made in the Text of this Policy are submitted to the general manager / responsible manager by the Personal Data Monitoring Committee as soon as possible.

Revision Date	Revision Article and Subject
1.	
2.	