



PERSONAL DATA PROTECTION AND PROCESSING POLICY

Uysallar Petrol Turizm Tekstil Gıda Nakliyat Sanayi Ve Ticaret A.Ş.
Ölüdeniz Mahallesi, Çarşı Caddesi, No:16 Fethiye/Muğla



1. SECTION- INTRODUCTION

1.1. Introduction, Purpose and Scope

The Personal Data Protection Law No. 6698 (“Law”), which was prepared over many years in line with European Union criteria, entered into force upon its publication in the Official Gazette dated April 7, 2016. The Law largely contains provisions in line with the European Union's Directive 95/46/EC, and with its entry into force, the protection of individuals' personal data has been brought under comprehensive legal regulation.

The protection of your personal data is of utmost importance to **UYSALLAR PETROL TURİZM TEKSTİL GIDA NAKLİYAT SANAYİ VE TİCARET A.Ş.** (the “Company” or “UYSALLAR”), registered with the Fethiye Trade Registry Office under MERSIS number 0385052792100035, with its registered address at Ölüdeniz Mahallesi, Çarşı Caddesi, No:16, Fethiye/Muğla. Pursuant to the Constitution of the Republic of Türkiye, everyone has the right to request the protection of their personal data. The protection of personal data is among the Company's top priorities, and within the scope of this Personal Data Protection and Processing Policy (the “Policy”), the Company demonstrates the utmost care in protecting the personal data of job applicants, Company officials, guests, service recipients, visitors, institutions with which the Company cooperates, their employees, shareholders, officials, and third parties.

The superior service quality adopted by the Company, respect for individual rights, transparency, and integrity principles, and in line with the new regulations stipulated by the Law; the Company's internal operations are regulated within the scope of the Law, secondary regulations, the decisions and regulations of the Personal Data Protection Board, and other relevant legislation, which are among the Company's top priorities. Therefore, this Policy has been established and implemented to enable our customers to benefit from the rights granted by the Law and to ensure compliance with the Law. In this context, the Company takes the necessary administrative and technical measures to protect personal data processed in accordance with the relevant legislation.

To ensure that the regulations to be introduced by the Company in accordance with the Law within the framework of the principles outlined above are effectively implemented within the Company, both by Company employees, and business partners; to provide explanations regarding the personal data processing activities conducted by the Company in a lawful manner and the systems adopted for the protection of personal data, to ensure that all administrative and technical measures are taken regarding the processing and protection of personal data within the Company's operations, to establish the necessary internal procedures, to determine all necessary training to raise awareness, and to establish appropriate and effective control mechanisms by taking all necessary measures for the compliance of employees and business partners with the Law processes.

This Policy applies to the protection of personal data of job applicants, Company officials, our customers, visitors, institutions we collaborate with and their employees, shareholders, and officials, and third parties, processed by automated means or by non-automated means as part of any data recording system.

1.2. DEFINITIONS

1.3.

Explicit Consent	Informed consent based on information and freely given to a specific matter.
Anonymization of Personal Data	It refers to the process of rendering personal data unidentifiable in any way, even when combined with other data, using techniques such as masking, aggregation, or data obfuscation, so that it cannot be associated with any specific or identifiable natural person.
Application Form	This refers to the Application Form to be submitted by the Data Subject (Personal Data Owner) to the Data Controller for the purpose of exercising their rights pursuant to the Personal Data Protection Law No. 6698.
Job Applicant	Refers to individuals who have applied for a job at the Company in any way or who have made their resume and related information available for review by the Company.

Employees and Authorized Representatives of Institutions We Collaborate With	It refers to individuals who work at institutions that have any kind of business relationship with the company, including the shareholders and authorized representatives of these institutions.
Business Partner	It refers to the parties with whom the company has established a business partnership for purposes such as carrying out various projects and receiving services while continuing its commercial activities.
Processing of Personal Data	The processing of personal data refers to any operation performed on such data; including collection, recording, storage, modification, reorganization, disclosure, transfer, acquisition, rendering accessible, classification, or restriction of use. Whether fully or partially automated or non-automated provided it forms part of a data recording system.
Data Subject	Refers to the individual whose personal data is processed.
Deletion of Personal Data	The deletion of personal data means that personal data is rendered inaccessible and unusable for the Relevant Users.
Destruction of Personal Data	It refers to the process of rendering personal data inaccessible, unrecoverable, and unusable by anyone in any way.
Personal Data	Any information relating to an identified or identifiable individual.
“KVK Board” or “Board	Refers to the Personal Data Protection Board.
Special Category Personal Data/Sensitive Personal Data	It refers to data concerning a person's race, ethnic origin, political opinion, philosophical belief, religion, denomination, or other beliefs, attire, membership in associations, foundations, or unions, health, sexual life, criminal convictions, and security measures, as well as biometric and genetic data.
Periodic Destruction	It refers to the deletion, destruction, or anonymization of personal data, which will be carried out automatically at recurring periods specified in the personal data retention policy, when all conditions for processing personal data under the Law cease to exist.
Company Official	Refers to the Company Manager and other authorized individuals.
Suppliers and Service Providers	The Company refers to parties that provide products or services to the Company in accordance with the Company's orders and instructions.
Third Party	Means individuals whose personal data are processed within the scope of this Policy and who are not otherwise expressly defined under this Policy
Data Processor	Refers to a natural or legal person who processes personal data on behalf of the data controller based on the authority granted by the data controller.
Data Controller	It refers to the natural or legal person who determines the purposes and means of processing personal data and is responsible for establishing and managing the place where the data is systematically stored (data recording system).
Visitor	Refers to individuals who have entered the Company's physical premises for various purposes.



2. SECTION- Matter Relating to the Processing of Personal Data

2.1. In General

The company processes personal data in accordance with Article 20 of the Constitution and Article 4 of the Law, in a manner that is lawful, fair, accurate, and up-to-date when necessary; for specific, explicit, and legitimate purposes; and in a manner that is relevant, limited, and proportionate to the purpose. The company retains personal data for as long as required by law or as necessary for the purpose of processing personal data..

The company informs the relevant persons in accordance with Article 20 of the Constitution and Article 10 of the Law and provides the necessary information when they request information in accordance with Article 11 of the Law. The company acts in accordance with the regulations stipulated for the processing of special categories of personal data in accordance with Article 6 of the Law. In accordance with Articles 8 and 9 of the Law, it acts in accordance with the regulations stipulated in the law and established by the Personal Data Protection Board regarding the transfer of personal data.

The company processes personal data based on one or more of the conditions set forth in Article 5 or Article 6 of the Law.

2.2. Processing of Personal Data in Compliance with the Principles Set Forth in the Legislation

2.2.1. Processing in Compliance with the Law and the Principle of Integrity

In accordance with the provisions of the law, personal data is processed in compliance with legal regulations and the general principles of good faith and fairness. In this context, the necessity of proportionality is taken into account in the processing of personal data, and personal data is not used for purposes other than those required by the purpose.

2.2.2. Ensuring Personal Data is Accurate and Updated When Necessary

The company ensures that the personal data it processes through the systems and communication channels it uses within its data processing procedures is accurate and up-to-date. It takes the necessary measures in this regard.

2.2.3. Processing for Specific, Clear and Legitimate Purposes

The company processes personal data for specific and legitimate purposes within the scope of its operations. It clearly states its data processing purposes in the information texts, explicit consent texts, and policies it has prepared.

2.2.4. Relevant, Limited and Proportionate to the Purpose for Which They are Processed

The company processes personal data in a manner that is suitable for achieving the specified purposes and avoids processing personal data that is not related to or necessary for achieving the purpose. For example, it does not carry out personal data processing activities aimed at meeting needs that may arise in the future.

2.2.5. Retaining for the Period Required by Relevant Legislation or Necessary for the Purpose for Which They Are Processed

The Company retains personal data only for as long as specified in the relevant legislation or as long as necessary for the purpose for which it is processed. In this context, it first determines whether the relevant legislation specifies a period for the storage of personal data; if a period is specified, it acts in accordance with that period; if no period is specified, it stores personal data for as long as necessary for the purpose for which it is processed. Upon the expiration of the period or the cessation of the reasons requiring processing, personal data is automatically or periodically deleted, destroyed, or anonymized by the Company.



2.3. Processing Personal Data based on one or more of the Personal Data Processing Conditions specified in Article 5 of the Law and limited to these conditions

The protection of personal data is a constitutional right. Fundamental rights and freedoms may only be restricted by law, based on the reasons specified in the relevant articles of the Constitution, without affecting their essence. Pursuant to the third paragraph of Article 20 of the Constitution, personal data may only be processed in cases provided for by law or with the explicit consent of the individual. The company processes personal data in accordance with this principle and the Constitution; personal data is processed only in cases provided for by law or with the explicit consent of the individual.

2.4. Informing and Notifying the Data Subject

The Company informs the relevant persons during the collection of personal data in accordance with Article 10 of the Law. In this context, the Company provides information regarding the identity of its representative, if any, the purpose for which personal data will be processed, to whom and for what purpose the processed personal data may be transferred, the method and legal basis for collecting personal data, and the rights of the personal data owner.

Article 20 of the Constitution establishes that everyone has the right to be informed about personal data concerning them. Accordingly, Article 11 of the Law lists “requesting information” among the rights of the personal data owner. Within this scope, the Company provides the necessary information in accordance with Article 20 of the Constitution and Article 11 of the Law when the relevant person requests information.

2.5. Processing of Special Category Personal Data

The company strictly complies with the regulations stipulated in the Personal Data Protection Law when processing personal data defined as “special category” by the Law.

Article 6 of the Law defines certain personal data as “special category” data, which, when processed unlawfully, carries the risk of causing harm or discrimination to individuals. These data include race, ethnic origin, political opinion, philosophical belief, religion, denomination, or other beliefs, attire and clothing, membership in associations, foundations, or unions, health, sexual life, criminal convictions, and security measures, as well as biometric and genetic data.

In accordance with the Law, the Company processes special category personal data in the following circumstances, provided that sufficient measures determined by the Personal Data Protection Board are taken:

- If the data subject has given explicit consent, or
- If the data subject's explicit consent is not obtained;
- Special category personal data other than that relating to the data subject's health and sex life, in cases provided for by law,
- Special category personal data relating to the data subject's health and sex life may only be processed by persons or authorized institutions and organizations subject to confidentiality obligations and only for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning and management of health services and their financing.

2.6. Transfer of the Personal Data

The Company may transfer the personal data and special category personal data of the data subject to third parties by taking the necessary security measures set forth in this Policy in accordance with the lawful purposes of personal data processing. In this regard, the Company acts in accordance with the provisions of Article 8 of the Law. Where the transfer of personal data is concerned, data protection and transfer agreements are signed with the natural or legal persons to whom the data is transferred, and these agreements contain provisions regarding the protection of data.



2.6.1. Transfer of the Personal Data

The company may transfer personal data to third parties based on ,and limited to, one or more of the personal data processing conditions specified in Article 5 of the Law below, by establishing the necessary confidentiality conditions and taking security measures in accordance with legitimate and lawful personal data processing purposes:

- ✓ If the data subject has given explicit consent,
- ✓ If there is an explicit provision in the law regarding the transfer of personal data,
- ✓ If it is necessary to protect the life or physical integrity of the data subject or another person, and the data subject is unable to express their consent due to actual impossibility or their consent is not legally valid;
- ✓ If the transfer of personal data belonging to the parties to a contract is necessary for the establishment or performance of the contract, provided that it is directly related to the contract,
- ✓ If the transfer of personal data is necessary for the Company to fulfill its legal obligations,
- ✓ If the personal data has been made public by the data subject,
- ✓ If the transfer of personal data is necessary to exercise, or protection of a right,
- ✓ If the transfer of personal data is necessary for the legitimate interests of the Company, provided that it does not harm the fundamental rights and freedoms of the data subject.

2.6.2. Transfer of the Special Category Personal Data

Şir The company may transfer the special category personal data of the data subject to third parties in the following circumstances, provided that it exercises due diligence, takes the necessary security measures, and implements the adequate safeguards prescribed by the Personal Data Protection Board, in accordance with legitimate and lawful personal data processing purposes.

- If the data subject has given explicit consent, or
- If the data subject has given explicit consent, or;
 - Special category personal data other than the data subject's health and sex life (race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, attire and clothing, membership in associations, foundations or unions, data related to criminal convictions and security measures, as well as biometric and genetic data), in cases stipulated by law,
 - Special category personal data relating to the data subject's health and sex life may only be processed by persons or authorized institutions and organizations subject to confidentiality obligations for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning and management of health services and their financing.

2.7. Transfer of the Personal Data Abroad

2.7.1. Transfer of Personal Data Abroad

The company only transfers personal data abroad within the scope of the Social Media Management Process and relies on the explicit consent of the relevant person during this transfer.

2.7.2. Transfer of Special Category Personal Data Abroad

The company only transfers special category personal data abroad within the scope of the Social Media Management Process and relies on the explicit consent of the relevant person during this transfer.

3. SECTION – Categorization of Personal Data Processed by the Company, Purposes of Processing, and Retention Periods

The company informs the data subject which groups of data subjects' personal data it processes, the purposes for which the data subject's personal data is processed, and the retention periods, in accordance with its



obligation to provide information under Article 10 of the Law.

3.1. Categorization of Personal Data

Within the Company; in accordance with the Company's legitimate and lawful personal data processing purposes, based on and limited to one or more of the personal data processing conditions specified in Article 5 of the Law, in compliance with the general principles specified in the Law, primarily the principles regarding the processing of personal data specified in Article 4, and all obligations regulated by the Law, and limited to the groups of persons covered by this Policy, personal data in the categories specified below are processed by informing the relevant persons in accordance with Article 10 of the Law.

Data Categories	Personal Data Categorization Explanation
Identity Information	Personal data refers to information that clearly belongs to an identified or identifiable natural person; processed either partially or fully automatically, or non-automatically as part of a data recording system; and contains information relating to the person's identity, such as documents like driver's licenses, identity cards, and passports containing information such as first name, last name, Turkish ID number, nationality information, mother's name, father's name, place of birth, date of birth, gender, and information such as tax number.
Contact Information	Information that clearly belongs to an identified or identifiable natural person; processed either partially or entirely automatically, or non-automatically as part of a data recording system; such as telephone number, address, email address, fax number.
Physical Premises Security Information	Personal data relating to a natural person whose identity is known or identifiable; processed either partially or entirely automatically, or non-automatically as part of a data recording system; personal data relating to records and documents obtained upon entry to a physical location and during stay within that physical location; information such as camera recordings, audio and video recordings, and records obtained at security checkpoints, entry time information.
Financial Information	Personal data processed in relation to information, documents, and records showing any financial outcome created according to the type of legal relationship established by our Company with the personal data owner, which is clearly attributable to an identified or identifiable natural person; processed partially or entirely automatically or non-automatically as part of a data recording system; and information such as bank account numbers and IBAN numbers.
Visual/Audio Data	Data contained in documents that are copies of documents containing personal data, such as photographs, camera recordings, audio recordings, and documents clearly belonging to an identified or identifiable natural person, as well as personal data such as photographs shared on social media.
Transaction Security Information	Personal data such as log records processed in relation to the technical, administrative, legal, and commercial security of both the relevant person and the Company, computer username and password information, website entry and exit information, and IP address information, while conducting Company activities.
Legal Transaction Information	Data such as information on lawsuits and enforcement files processed within the scope of the Company's legal claims and rights, the determination and follow-up of these claims and rights, the fulfillment of its obligations, and its legal obligations.
Personal Information	Personal data such as Social Security numbers, payroll information, entry and exit time records, and Social Security service records, which are clearly attributable to an identified or identifiable natural person; processed either partially or fully automatically or non-automatically as part of a data recording system; and processed for the purpose of obtaining information that will form the basis for the establishment of the personal rights of natural persons in an employment relationship with the Company and for the functioning of the Company's Human Resources functions.

Special Category Personal Data	Personal data that clearly belongs to an identified or identifiable natural person; processed partially or entirely automatically or non-automatically as part of a data recording system; data specified in Article 6 of the Law, including health data such as blood type, criminal record, and medical history.
Other Data	Data that clearly belongs to an identified or identifiable natural person; data processed partially or entirely automatically or non-automatically as part of a data recording system, such as military status, areas of interest, motor vehicle license information, motor vehicle license plate, application evaluation information, application information, travel, entry and exit information, etc.
Professional Experience Data	Data relating to professional experience in the resume, which is clearly attributable to an identified or identifiable natural person; processed partially or entirely automatically or non-automatically as part of a data recording system; educational status, graduation date, resume, course information, certificate information, last school attended, specialization information.
Education Information	Information that clearly belongs to an identified or identifiable natural person; processed partially or entirely automatically or non-automatically as part of a data recording system; information about the person's educational status and educational background, such as the school graduated from, education and courses taken, and diploma information.
Customer Transactions	Data that clearly belongs to an identified or identifiable natural person; processed partially or entirely automatically or non-automatically as part of a data recording system; data such as invoice information and payment amount.

3.2. Purposes of Processing Personal Data

Job Applicant		
Data Category	Processed Data	Purposes of Processing Personal Data
Other - Military Service	Military Status (Whether or Not He Has Served in the Military)	✓ Conducting Employee Candidate/Intern/Student Selection and Placement Processes ✓ Conducting Employee Candidate Application Processes ✓ Conducting Communication Activities ✓ Planning Human Resources Processes ✓ Execution/Supervision of Business Activities ✓ Receiving and Evaluating Suggestions for Improving Business Processes ✓ Execution of Activities to Ensure Business Continuity ✓ Execution of Talent/Career Development Activities
Professional Experience	Education Status Graduation Date Course Information Computer Skills Foreign Language Skills Graduation Grade Name of Graduating School and Department Resume Certificate Information Professional Training Occupation Length of Service at Previous Employer Previous Position Work Experience Previous Employer Name Reason for Leaving Previous Employer Position Applied For Expectations Computer Skills	

	Place of Birth Date of Education Educational Institution Duration of Education Start Date Subject of Training Attended	
Visual Records	Photograph	
Contact Information	Street Address Email Address Phone Number	
Identity	Name Gender Date of Birth Marital Status Driver's License Information Last Name Signature	
Health	Disability Status (Whether Disabled or Not) Medical History	
Other - Application Information	Expectation Overtime Preference Information	

Employee		
Data Category	Processed Data	Purposes of Processing Personal Data
Criminal Convictions and Security Measures	Criminal Record	✓ Execution of Emergency Management Processes ✓ Execution of Information Security Processes ✓ Execution of Employee Candidate Application Processes ✓ Fulfillment of Employment Contract and Statutory Obligations for Employees ✓ Execution of Processes for Employee Benefits and Perks ✓ Execution of Audit/Ethics Activities ✓ Execution of Access Authorizations ✓ Conducting Activities in Compliance with Legislation ✓ Conducting Finance and Accounting Operations ✓ Conducting Processes Related to Company/Product/Service Loyalty ✓ Ensuring Physical Premises Security ✓ Conducting Assignment Processes ✓ Monitoring and Execution of Legal Affairs ✓ Execution of Internal
Other - Military Service	Military Status (Whether Military Service Was Performed)	
Other - Education Information	Date of Education Hours of Education	
Other - Performance Evaluation Information	Performance Evaluation Output	
Finance	Salary Information	
	IBAN Number Bank Name Bank Account Number Payment Description	

	Payment Amount	- Audit/Investigation/Intelligence Activities ✓ Execution of Communication Activities ✓ Planning of Human Resources Processes ✓ Execution of Employee Satisfaction and Loyalty Processes for Business Activities ✓ Execution/Audit of Business Activities ✓ Execution of Occupational Health/Safety Activities ✓ Receiving and Evaluating Suggestions for Improving Business Processes ✓ Execution of Business Continuity Activities ✓ Creation of User Accounts ✓ Execution of Logistics Activities ✓ Execution of Goods/Services Procurement Processes ✓ Execution of Goods/Services After-Sales Support Services ✓ Execution of Goods/Services Sales Processes ✓ Execution of Goods/Services Production and Operations Processes ✓ Execution of Customer Relationship Management Processes ✓ Conducting Customer Satisfaction Activities ✓ Organization and Event Management ✓ Conducting Performance Evaluation Processes ✓ Maintaining Time and Attendance Records ✓ Execution of Risk Management Processes ✓ Execution of Storage and Archiving Activities ✓ Execution of Contract Processes ✓ Tracking Requests/Complaints ✓ Ensuring the Security of Movable Property and Resources ✓ Implementing Supply Chain Management Processes ✓ Implementing the Compensation Policy ✓ Implementing Product/Service Marketing Processes ✓ Ensuring the Security of Data Controller Operations ✓ Execution of Talent/Career Development Activities ✓ Providing Information to Authorized Persons, Institutions, and Organizations ✓ Execution of Management Activities ✓ Creation and Tracking of Visitor Records
Physical Premises Security	Card Number Entry Time Entry Area Information Camera Recording Entry Date	
Visual Records	Photograph	
Legal Proceedings	Case and Enforcement File Information	
Contact information	Phone Number Full Address Information Email Address	
Transaction Security	Information Log Records Website Login/Logout Information IP Address Information	
Identity	First Name Last Name Employment Status ID Image Department Leave Start Date Leave Return Date Signature Reason for Leave Mother's Name Father's Name ID Card Serial Number ID Card Family Sequence Number ID Card Sequence Number Place of Registration Gender Date of Birth Place of Birth ID Number Passport Number Driver's License Information Passport Type Passport Expiration Date Passport Issuance Location Passport Image Nationality	
Professional Experience	GPA Name of School and Department Graduated From Certificate Information	

	Transcript Information Foreign Language Proficiency Computer Skills Diploma Date of Graduation Educational Status Course Information Professional Training	
Personnel	Position Department Title Social Security Service Record Social Security / Retirement Information (Social Security Registration) Employment Agency Registration Date Employment Contract Information Leave Information Occupation Occupation Code Resume Social Security Registration Number Payroll Information Leave End Date Leave Return Date Reason for Leave Company Registration Number Work Performed Duties	
Health	Disability Status (Whether Disabled or Not) Medical Report Blood Type Information Periodic Medical Examination Form for Employment Illness Carrier Examination Report Medical Report Chest X-ray	

Supplier Employee		
Data Category	Processed Data	Purposes of Processing Personal Data
Other - Motor Vehicle Data	Vehicle License Plate	✓ Execution of Emergency Management Processes ✓ Execution of Information Security Processes ✓ Execution of Audit/Ethics Activities ✓ Execution of Activities in Compliance with Legislation
Other - Visit Information	Reason for Visit Date of Visit	✓ Execution of Finance and Accounting Operations ✓ Execution of Company/Product/Service Loyalty Processes
Physical Premises Security	Camera Recording	✓ Ensuring Physical Premises Security ✓ Execution of Assignment Processes ✓ Monitoring and Execution of Legal Affairs ✓ Execution of Internal Audit/ Investigation/ Intelligence Activities ✓ Execution of Communication Activities ✓ Execution of Business Activities ✓ Execution/Audit of Business Activities ✓ Execution of Business Continuity Activities ✓ Execution of Logistics Activities ✓ Execution of Goods/Services Procurement Processes ✓ Execution of Goods/Services Post-Sales Support Services ✓ Execution of Goods/Services Sales Processes ✓ Execution of Goods/Services Production and Operations Processes
Contact Information	Address Email Address Phone Number	✓ Execution of Customer Relationship Management Processes ✓ Execution of Activities Aimed at Customer Satisfaction ✓ Organization and Event Management ✓ Execution of Advertising/Campaign/Promotion Processes
Identity	Date of Birth First Name ID Number Last Name	✓ Execution of Risk Management Processes ✓ Execution of Storage and Archiving Activities ✓ Execution of Contract Processes ✓ Tracking Requests/Complaints ✓ Ensuring the Security of Movable Property and Resources ✓ Implementing Supply Chain Management Processes ✓ Implementing the Compensation Policy ✓ Implementing Product/Service Marketing Processes ✓ Ensuring the Security of Data Controller Operations ✓ Providing Information to Authorized Persons, Institutions, and Organizations ✓ Conducting Management Activities ✓ Creating and Tracking Visitor Records
Personell	Position	

Supplier Representative		
Data Category	Processed Data	Purposes of Processing Personal Data
Identity	Date of Birth Last Name First Name ID Number Nationality	✓ Conducting Audit/Ethics Activities ✓ Exercising Access Rights ✓ Conducting Activities in Compliance with Legislation ✓ Execution of Finance and Accounting Operations ✓ Execution of Assignment Processes ✓ Monitoring and Execution of Legal Affairs ✓ Execution of Internal Audit/Investigation/Intelligence Activities ✓ Execution of Communication Activities ✓ Execution/Audit of Business Activities ✓ Execution of Business Continuity Activities ✓ Execution of Logistics Activities ✓ Execution of Goods/Services Procurement Processes ✓ Post-Sales Support for Goods/Services ✓ Execution of Goods/Services Sales Processes ✓ Execution of Goods/Services Production and Operations Processes ✓ Execution of Storage and Archiving Activities ✓ Execution of Contract Processes ✓ Execution of Strategic Planning Activities ✓ Tracking of Requests/Complaints ✓ Execution of Supply Chain Management Processes ✓ Provision of Information to Authorized Persons, Institutions, and Organizations ✓ Execution of Management Activities
Contact Information	Email Address Phone Number	
Personell	Duty	

Supplier		
Data Category	Processed Data	Purposes of Processing Personal Data
Other - Motor Vehicle Data	Vehicle License Plate	✓ Execution of Emergency Management Processes ✓ Execution of Information Security Processes ✓ Execution of Audit/Ethics Activities ✓ Execution of Access Authorizations ✓ Execution of Activities in Compliance with Legislation ✓ Execution of Finance and Accounting Tasks ✓ Execution of Processes Related to Company/Product/Services ✓ Ensuring Physical Premises Security ✓ Execution of Assignment Processes ✓ Monitoring and Execution of Legal Tasks
Other - Appointment Information	Appointment Time Appointment Date	

Other - Visit Information	Reason for Visit Date of Visit	✓ Conducting Internal Audit/Investigation/Intelligence Activities ✓ Conducting Communication Activities ✓ Conducting Business Activities ✓ Conducting/Auditing Business Activities ✓ Execution of Business Continuity Activities ✓ Execution of Logistics Activities ✓ Execution of Goods/Services Procurement Processes ✓ Execution of Goods/Services Post-Sales Support Services ✓ Execution of Goods/Services Sales Processes ✓ Execution of Goods/Services Production and Operations Processes ✓ Execution of Customer Relationship Management Processes ✓ Execution of Activities Aimed at Customer Satisfaction ✓ Organization and Event Management ✓ Execution of Advertising/Campaign/Promotion Processes ✓ Execution of Risk Management Processes ✓ Execution of Storage and Archiving Activities ✓ Execution of Contract Processes ✓ Execution of Strategic Planning Activities ✓ Tracking of Requests/Complaints ✓ Ensuring the Security of Movable Property and Resources ✓ Execution of Supply Chain Management Processes ✓ Execution of Compensation Policy ✓ Execution of Product/Service Marketing Processes ✓ Ensuring the Security of Data Controller Operations ✓ Providing Information to Authorized Persons, Institutions, and Organizations ✓ Execution of Management Activities ✓ Creation and Tracking of Visitor Records
Finance	Bank Name Bank Account Number IBAN Number Payment Description Payment Amount	
Physical Premises Security	Camera Recording	
Legal Proceedings	Case and enforcement file information	
Contact Information	Full Address Information Email Address Phone Number	
Identity	Date of Birth First Name Position Signature ID Number Last Name Tax Office Tax ID Number Nationality	
Customer Transactions	Invoice Information Payment Amount	
Personell	Position	

Person Receiving the Product or Service		
Data Category	Processed Data	Purposes of Processing Personal Data
Finance	Bank Name Bank Account Number IBAN Number Payment Description Payment Amount	✓ Conducting Audit/Ethics Activities ✓ Exercising Access Rights ✓ Conducting Activities in Compliance with Legislation ✓ Conducting Finance and Accounting Operations

Contact Information	Address Information Email Address Phone Number	✓ Conducting Loyalty Processes Related to Companies/Products/Services ✓ Conducting Assignment Processes ✓ Monitoring and Execution of Legal Affairs ✓ Execution of Internal Audit/Investigation/Intelligence Activities ✓ Execution of Communication Activities ✓ Execution/Audit of Business Activities ✓ Execution of Business Continuity Activities ✓ Execution of Logistics Activities ✓ Execution of Goods/Services Procurement Processes ✓ Post-Sales Support for Goods/Services ✓ Execution of Goods/Services Sales Processes ✓ Execution of Goods/Services Production and Operations Processes ✓ Execution of Customer Relationship Management Processes ✓ Execution of Activities Aimed at Customer Satisfaction ✓ Execution of Storage and Archiving Activities ✓ Execution of Contract Processes ✓ Execution of Strategic Planning Activities ✓ Tracking of Requests/Complaints ✓ Execution of Supply Chain Management Processes ✓ Execution of Compensation Policy ✓ Execution of Product/Service Marketing Processes ✓ Providing Information to Authorized Persons, Institutions, and Organizations ✓ Execution of Management Activities
Identity	First Name Signature ID Number Last Name Date of Birth Place of Birth ID Card Serial Number Passport Number	
Customer Transaction	Invoice Information Payment Amount	

Foreign Employee		
Data Category	Processed Data	Purposes of Processing Personal Data
Other-Travel	Places Where the Person Has Been in Turkey Dates of Stay Reasons for Stay	✓ Fulfilling Employment Contract and Legal Obligations for Employees ✓ Conducting Activities in Compliance with Legislation ✓ Conducting Communication Activities ✓ Planning Human Resources Processes ✓ Conducting Storage and Archiving Activities ✓ Conducting Contract Processes ✓ Residence and Work Permit Procedures for Foreign Personnel ✓ Providing Information to Authorized Persons, Institutions, and Organizations ✓ Conducting Management Activities
Visual Records	Photo	
Contact Information	Mailing Address Residential Address Phone Number	

Identity	First Name Mother's Name Father's Name Gender Date of Birth Place of Birth Marital Status Passport Number Passport Type Passport Expiration Date Passport Translation Last Name Whether They Will Bring Their Spouse and Children Foreign ID Number Nationality	
Professional Experience	Previous Places of Employment Other (Certificates, etc.) Diploma Translation Area of Specialization Previous Place of Employment	
Personell	Salary Nature of the Position in the Region Employment Contract Information	

Visitor		
Data Category	Processed Data	Purposes of Processing Personal Data
Identity	Date of Birth First Name ID Number Last Name Nationality	✓ Execution of Emergency Management Processes ✓ Execution of Information Security Processes ✓ Execution of Audit/Ethics Activities ✓ Execution of Activities in Compliance with Legislation ✓ Ensuring Physical Premises Security ✓ Execution of Assignment Processes ✓ Follow-up and Execution of Legal Affairs ✓ Execution of Internal Audit/Investigation/Intelligence Activities ✓ Execution of Communication Activities ✓ Execution/Audit of Business Activities ✓ Execution of Business Continuity Activities ✓ Execution of Logistics Activities ✓ Execution of Customer Relationship Management Processes ✓ Execution of Activities Aimed at Customer Satisfaction ✓ Organization and Event Management ✓ Execution of Storage and Archiving Activities ✓ Execution of Contract Processes ✓ Tracking of Requests/Complaints
Other - Appointment Information	Appointment Time Appointment Date	
Other - Visit Information	Reason for Visit Visit Time Visit Date	
Physical Premises Security	Camera Recording	
Contact Information	Phone Number	



		✓ Ensuring the Security of Data Controller Operations ✓ Providing Information to Authorized Persons, Institutions, and Organizations ✓ Execution of Management Activities ✓ Creation and Tracking of Visitor Records
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The company processes personal data within the scope of the purposes and conditions specified in Article 5, paragraph 2, and Article 6, paragraph 3, of the Law. These purposes and conditions are as follows:

- ✓ You have given your explicit consent for the processing of your personal data.
- ✓ The processing of your personal data by the Company is directly related to and necessary for the establishment or performance of a contract.
- ✓ Provided that your personal data has been made public by you, it may be processed by the Company in a limited manner for the purpose of making it public.
- ✓ The processing of your personal data by the Company is necessary for the establishment, exercise, or protection of the rights of our Company, you, or third parties
- ✓ The processing of personal data is necessary for the legitimate interests of our Company, provided that it does not harm your fundamental rights and freedoms
- ✓ For special categories of personal data relating to the health and sex life of the data subject, processing by persons or authorized institutions and organizations subject to confidentiality obligations for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning and management of health services and their financing.

In this context, the Company processes your personal data for the following purposes only, within the scope of the personal data processing conditions specified in Articles 5 and 6 of the Law:

- ✓ Execution of Emergency Management Processes
- ✓ Execution of Vehicle Pass Application Processes
- ✓ Execution of Information Security Processes
- ✓ Execution of Employee Candidate/Intern/Student Selection and Placement Processes
- ✓ Execution of Employee Candidate Application Processes
- ✓ Execution of Employee Card Issuance Processes
- ✓ Execution of Employee Satisfaction and Loyalty Processes
- ✓ Fulfillment of Employment Contract and Statutory Obligations for Employees
- ✓ Execution of Processes for Employee Benefits and Perks
- ✓ Execution of Audit/Ethics Activities
- ✓ Execution of Training Activities
- ✓ Execution of Access Authorization
- ✓ Execution of Emergency Management Processes for Activities
- ✓ Execution of Activities in Compliance with Legislation
- ✓ Execution of Finance and Accounting Operations
- ✓ Execution of Company/Product/Service Loyalty Processes
- ✓ Ensuring Physical Premises Security
- ✓ Implementation of Assignment Processes
- ✓ Monitoring and Implementation of Legal Affairs
- ✓ Implementation of Internal Audit/Investigation/Intelligence Activities
- ✓ Implementation of Communication Activities
- ✓ Planning Human Resources Processes
- ✓ Execution of Employee Satisfaction and Loyalty Processes in Business Activities
- ✓ Execution/Supervision of Business Activities



- ✓ Execution of Occupational Health and Safety Activities
- ✓ Receiving and Evaluating Suggestions for Improving Business Processes
- ✓ Creating User Accounts
- ✓ Executing Logistics Activities
- ✓ Execution of Goods/Services Procurement Processes
- ✓ Execution of Goods/Services Post-Sales Support Services
- ✓ Execution of Goods/Services Sales Processes
- ✓ Execution of Goods/Services Production and Operations Processes
- ✓ Execution of Customer Relationship Management Processes
- ✓ Execution of Activities Aimed at Customer Satisfaction
- ✓ Organization and Event Management
- ✓ Execution of Marketing Analysis Studies
- ✓ Execution of Performance Evaluation Processes
- ✓ Maintenance of Time Records
- ✓ Execution of Advertising/Campaign/Promotion Processes
- ✓ Execution of Risk Management Processes
- ✓ Execution of Storage and Archiving Activities
- ✓ Execution of Contract Processes
- ✓ Execution of Strategic Planning Activities
- ✓ Tracking of Requests/Complaints
- ✓ Ensuring the Security of Movable Property and Resources
- ✓ Execution of Supply Chain Management Processes
- ✓ Implementation of Compensation Policy
- ✓ Implementation of Product/Service Marketing Processes
- ✓ Ensuring the Security of Data Controller Operations
- ✓ Foreign Personnel Residence and Work Permit Procedures
- ✓ Execution of Investment Processes
- ✓ Execution of Talent/Career Development Activities
- ✓ Provision of Information to Authorized Persons, Institutions, and Organizations
- ✓ Execution of Management Activities
- ✓ Creation and Tracking of Visitor Records

3.3. Kişisel Verilerin Saklanma Süreleri

The Company stores personal data for the period specified in the relevant laws and regulations, if required by such laws and regulations. If the legislation does not specify a period for how long personal data should be stored, Personal Data is processed for as long as required by the Company's practices and commercial life customs in connection with the activity carried out while processing the data, and is then deleted, destroyed, or anonymized. Detailed information on this subject is provided in Section 8 of this Policy.

If the purpose of processing personal data has ended and the retention periods specified by the relevant legislation and the Company have also expired, personal data may only be retained for the purpose of serving as evidence in potential legal disputes or for asserting or defending rights related to personal data. The periods referred to herein are determined based on the limitation periods for asserting the aforementioned right and, even after the limitation periods have expired, on examples from previous requests made to the Company on the same issues. In this case, the stored personal data is not accessed for any other purpose, and access to the relevant personal data is only granted when it is necessary for use in the relevant legal dispute. Here too, after the aforementioned period has expired, personal data is deleted, destroyed, or anonymized.

Veri Kategorisi	Veri Saklama Süresi (En Fazla)
Criminal Convictions and Security Measures	Ten Years from the Termination of the Legal Relationship
Education Information	One Year from the Termination Of the Legal Relationship
Finance	Ten Years from the Termination of the Legal Relationship
Physical Premises Security	Ten Years from the Termination of the Legal Relationship
Visual Records	Ten Years from the Termination of the Legal Relationship
Legal Proceedings	Ten Years from the Termination of the Legal Relationship
Contact Information	Ten Years from the Termination of the Legal Relationship
Transaction Security	Two Years from the Termination of the Legal Relationship
Identity	Two Years from the Termination of the Legal Relationship
Professional Experience	Ten Years from the Termination of the Legal Relationship
Customer Transactions	2 Years
Personell	Ten Years from the Termination of the Legal Relationship
Health	Ten Years from the Termination of the Legal Relationship

4. SECTION- Third Parties to Whom the Company Transfers Personal Data and The Purposes of Transfer

The Company informs the data subject of the groups of persons to whom personal data is transferred in accordance with Article 10 of the Law. In accordance with Articles 8 of the Law, the Company may transfer the personal data of data subjects governed by the Policy to the following categories of persons:

- Company officials,
- Legally authorized public institutions and organizations,
- Legally authorized private legal entities,
- Publicly available

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

Parties to Whom Data May Be Transferred	Definition	Purpose of Data Transfer
Legally Authorized Public Institutions and Organizations	Public institutions and organizations authorized to obtain information and documents from the Company in accordance with the relevant legislation (Ministry)	Within the scope of the legal authority of the relevant public institutions and organizations, and limited to the purpose requested by them
Natural Persons or Private Legal Entities	Private legal entities authorized to obtain information and documents from the Company in accordance with the relevant legislation (Independent Auditors, Banks, E-Archive Invoice Service Providers)	It may be transferred within the scope of the legal authority of the relevant private legal entities in accordance with the provisions of the legislation for the purpose requested.
Company Officials	Persons with management and supervisory authority within the company	Data may be transferred to Company officials for the purpose of ensuring business continuity by carrying out Company management and control processes.



5. SECTION- Processing of Personal Data Based on and Limited to the Conditions for Processing Set Out in the Law

The company informs the data subject about the personal data it processes in accordance with Article 10 of the Law.

5.1. Processing of Personal Data and Special Category Personal Data

5.1.1. Processing of Personal Data

The explicit consent of the data subject is only one of the legal bases that enable the lawful processing of personal data. In addition to explicit consent, personal data may also be processed if any of the other conditions listed below are met. The basis for personal data processing activities may be only one of the conditions specified below, or more than one of these conditions may be the basis for the same personal data processing activity. If the processed data is special category personal data, the conditions set out under heading 5.1.2 below apply.

Although the legal bases for the processing of personal data by our company may vary, all personal data processing activities are carried out in accordance with the general principles set out in Article 4 of the Law.

a. Data Subject's Explicit Consent

One of the conditions for processing personal data is the explicit consent of the data subject. The explicit consent of the personal data subject must be specific to a particular matter, based on information provided, and freely given.

For personal data processing activities other than the purpose of processing related to the reasons for obtaining personal data, at least one of the conditions listed in sections b, c, d, e, f, g, and h of this heading must be met. If none of these conditions apply, the Company carries out these personal data processing activities based on the explicit consent of the personal data subject for these processing activities.

b. Explicitly Provided for in the Laws

The data subject's personal data may be processed lawfully if expressly provided for by law.

c. Failure to Obtain the Explicit Consent of Data Subject Due to Practical Impossibility

Where a person is unable to express consent due to actual impossibility or where consent cannot be deemed valid, the data subject's personal data may be processed if such processing is necessary to protect the life or physical integrity of that person or another individual.

d. Directly Related to the Formation or Performance of the Contract

The processing of personal data belonging to the parties to a contract is possible if it is necessary for the establishment/performance of the contract, provided that it is directly related to the establishment/performance of the contract. Data such as name and surname, which are essential elements of the contract, may be cited as examples.



e. Fulfillment of Legal Obligations

The company may process the data subject's personal data if processing is necessary for the company to fulfill its legal obligations as the data controller.

f. Disclosure of Personal Data by the Data Subject

If the data subject has made their personal data public, the relevant personal data may be processed.

g. The Necessity of Data Processing for the Establishment or Protection of a Right

Personal data may be processed where processing is necessary for the establishment, exercise, or defense of a legal claim.

h. Data Processing is Necessary for the Legitimate Interests of the Data Controller

Personal data may be processed if it is necessary for the legitimate interests of the Company, provided that it does not harm the fundamental rights and freedoms of the data subject. Recording with security cameras for the purpose of ensuring security may be given as an example.

5.1.2. Processing of Special Category Personal Data

Special category personal data may be processed by the company without the explicit consent of the data subject only if sufficient safeguards determined by the Personal Data Protection Board are in place. Special category personal data, excluding data concerning the data subject's health and sexual life, is processed in cases provided for by law:

- ✓ Personal data may be processed if the data subject has given explicit consent.
- ✓ If the data subject has not given explicit consent:
 - Special category personal data other than the data subject's health and sex life may only be processed in the cases provided for by law.
 - Special category personal data relating to the data subject's health and sex life may only be processed by persons or authorized institutions and organizations subject to confidentiality obligations for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning and management of health services and their financing.

6. SECTION – Personal Data Processing Activities Performed at Building and Facility Entrances and Inside Buildings and Facilities, and Website Visitors

Personal data processing activities carried out by the Company at its entrances and within the Company are conducted in accordance with the Constitution, the Law, and other relevant legislation. The Company processes personal data for the purpose of ensuring security.

Your personal data is processed via security cameras due to the legitimate interest of the data controller. Data processed for the purpose of ensuring physical premises security is not transferred abroad.

7. SECTION – Deletion, Destruction, and Anonymization of Personal Data

The Company shall delete, destroy, or anonymize personal data in accordance with its own decision or upon the request of the personal data owner if the reasons requiring its processing cease to exist, even though it has been



processed in accordance with the relevant provisions of the law as stipulated in Article 138 and Article 7 of the Turkish Penal Code.

8. Matters Related to the Protection of Personal Data

The Company takes the necessary technical and administrative measures to ensure an appropriate level of security in order to prevent the unlawful processing of personal data it processes, prevent unlawful access to such data, and ensure the protection of such data, in accordance with Article 12 of the Law. In this context, it conducts or commissions the necessary audits.

9. Ensuring the Security of Personal Data

9.1.1. Technical and Administrative Measures Taken to Ensure the Lawful Processing of Personal Data

The company takes technical and administrative measures to ensure the lawful processing of personal data, based on technological capabilities and implementation costs.

Technical Measures Taken to Ensure the Lawful Processing of Personal Data

- ✓ Personal data processing activities carried out within the company are monitored by established technical systems.
- ✓ The technical measures taken are periodically reported to the relevant parties as required by the internal audit mechanism.
- ✓ Personnel knowledgeable in technical matters are employed.
- ✓ An Authorization Matrix has been created within the company regarding data processing procedures.
- ✓ Authorization Controls are regularly performed by the data controller or persons authorized by the data controller.
- ✓ Data masking is applied when necessary.
- ✓ Up-to-date anti-virus programs are used on computers used within the company.
- ✓ Personal data is regularly deleted, destroyed, or anonymized upon expiration of the periods specified in the inventory.
- ✓ Technical measures are taken in line with technological developments, and the measures taken are periodically updated and renewed.
- ✓ Access and authorization technical solutions are implemented in accordance with the legal compliance requirements determined on a business unit basis.
- ✓ Access rights are restricted, and authorizations are reviewed regularly.
- ✓ The technical measures taken are periodically reported to the relevant parties as required by the internal audit mechanism, and issues posing a risk are reassessed to produce the necessary technological solutions.
- ✓ Software and hardware, including virus protection systems and firewalls, are installed.
- ✓ Technical experts are employed and/or external consulting firms are engaged.
- ✓ Applications that collect personal data undergo regular security scans to identify vulnerabilities. Any vulnerabilities found are addressed.

Administrative Measures Taken to Ensure the Lawful Processing of Personal Data

- ✓ Employees are informed and trained on the Law on the Protection of Personal Data and the lawful processing of personal data.
- ✓ The company analyzes all its activities in detail for each business unit, and as a result of this analysis, personal data processing activities are identified for the activities carried out by the relevant business



units.

- ✓ The Company determines the requirements to be met to ensure that the personal data processing activities carried out by the business units comply with the personal data processing conditions required by the Law, for each business unit and the specific activities it carries out.
- ✓ To ensure compliance with the legal requirements determined on a business unit basis, awareness is raised and implementation rules are established for the relevant business units; the necessary administrative measures are implemented through internal Company policies and training to ensure the supervision of these matters and the continuity of implementation.
- ✓ The legal relationship between the Company and its employees is governed by contracts and documents that impose obligations not to process, disclose, or use personal data, except as directed by the Company or as permitted by law. Records are kept to ensure compliance with these obligations, employee awareness is raised, and audits are conducted to fulfill the obligations arising from the Law.
- ✓ The data controller has prepared a personal data processing inventory.
- ✓ The data controller has prepared and published a Personal Data Processing Policy and a Personal Data Storage and Destruction Policy.
- ✓ Random internal audits and reviews are conducted.
- ✓ A notification has been submitted to the VERBİS system.
- ✓ Employees are trained on the technical measures to be taken to prevent unlawful access to personal data.
- ✓ Personal data processing is designed and implemented within the Company in accordance with legal compliance requirements, based on the business unit, and processes for accessing and authorizing personal data are designed and implemented.
- ✓ Employees are informed that they cannot disclose the personal data they have learned to others in violation of the provisions of the Law, cannot use it for purposes other than processing, and that this obligation will continue even after they leave their jobs, and the necessary commitments are obtained from them in this regard.
- ✓ Contracts entered into by the Company with persons to whom personal data is transferred in accordance with the law include provisions stating that the persons to whom personal data is transferred will take the necessary security measures to protect personal data and ensure compliance with these measures within their own organizations.

9.1.2. Storing Personal Data in Secure Environments

The company takes the necessary technical and administrative measures, in accordance with technological capabilities and implementation costs, to ensure that personal data is stored in secure environments and to prevent its destruction, loss, or alteration for unlawful purposes.

Technical Measures Taken to Store Personal Data in Secure Environments

The main technical measures taken by the company to store personal data in secure environments are listed below:

- ✓ Systems that are compatible with technological developments are used to store personal data in secure environments.
- ✓ Backup programs are used in a legally compliant manner to ensure that personal data is stored securely.
- ✓ Access to environments where personal data is stored is restricted, allowing only authorized persons to access this data for the purpose of storing personal data. Access to data storage areas where personal data is located is logged, and any inappropriate access or access attempts are immediately reported to the relevant parties.

Administrative Measures Taken to Store Personal Data in Secure Environments

The main administrative measures taken by the company to store personal data in secure environments are listed below:



- ✓ Employees are trained to ensure that personal data is stored securely.
- ✓ Legal and technical consulting services are obtained to monitor developments in information security, privacy, and personal data protection and to take the necessary actions.
- ✓ If the company outsources the storage of personal data due to technical requirements, the contracts concluded with the relevant companies to which personal data is transferred stipulate that the persons to whom personal data is transferred will take the necessary security measures to protect personal data and ensure compliance with these measures within their own organizations.

9.1.3. Audit of Measures Taken Regarding the Protection of Personal Data

The Company conducts or commissions the necessary audits within its own structure in accordance with Article 12 of the Law. The results of these audits are reported to the relevant department within the Company's internal operations, and the necessary activities are carried out to improve the measures taken.

9.1.4. Measures to Be Taken in the Event of Unauthorized Disclosure of Personal Data

The company operates a system that ensures that, in accordance with Article 12 of the Law, the unlawful acquisition of personal data processed by the company by others is reported to the relevant Data Subject and the Personal Data Protection Board as soon as possible. If deemed necessary by the Personal Data Protection Board, this situation may be announced on the Personal Data Protection Board's website or by other means.

9.2. Safeguarding Data Subject Rights and Evaluating Data Subject Requests

The company implements the necessary channels, internal procedures, administrative and technical arrangements in accordance with Article 13 of the Law to assess the rights of the relevant persons and provide them with the necessary information.

If the relevant persons submit their requests regarding the rights listed below to the Company in writing, the Company will process the request free of charge as soon as possible and within thirty days, depending on the nature of the request. However, if the Personal Data Protection Board (KVK) stipulates a fee, the Company may charge the fee specified in the tariff determined by the KVK. The relevant persons;

- Learning whether personal data has been processed,
- Requesting information about the processing of personal data,
- Learning the purpose of the processing of personal data and whether it is being used for its intended purpose,
- Knowing the third parties to whom personal data has been transferred within or outside the country,
- Requesting the correction of personal data if it has been processed incompletely or incorrectly, and requesting that the third parties to whom the personal data has been transferred be notified of this action,
- To request the deletion or destruction of personal data when the reasons for processing no longer exist, even if the processing was carried out in accordance with the law and other relevant legal provisions, and to request that the third parties to whom the personal data has been transferred be notified of this action,
- Object to the analysis of processed data exclusively through automated systems resulting in a negative outcome for the individual,
- Request compensation for damages incurred due to the unlawful processing of personal data. Data subjects have these rights, and more detailed information on data subjects' rights is provided in the following sections of this Policy.

10. SECTION- Right of Data Subjects; Exercising and Assessing These Rights



The Company informs the data subject of their rights in accordance with Article 10 of the Law, guides the data subject on how to exercise these rights, and implements the necessary channels, internal procedures, administrative and technical arrangements in accordance with Article 13 of the Law to assess the rights of the data subjects and provide them with the necessary information.

10.1. Data Subject's Rights and Exercising These Rights

10.1.1. Data Subject's Rights

The relevant persons have the following rights:

- To learn whether personal data has been processed,
- To request information regarding the processing of personal data,
- To learn the purpose of the processing of personal data and whether it is being used for its intended purpose,
- To know the third parties to whom personal data has been transferred within or outside the country,
- To request the correction of personal data if it has been processed incompletely or incorrectly, and to request that the third parties to whom the personal data has been transferred be notified of this action,
- To request the deletion or destruction of personal data when the reasons for processing no longer exist, even if the processing was carried out in accordance with the law and other relevant legal provisions, and to request that the third parties to whom the personal data has been transferred be notified of this action,
- Object to the analysis of processed data exclusively through automated systems resulting in a decision against the individual,
- Request compensation for damages incurred due to the unlawful processing of personal data

10.1.2. Cases Where Data Subjects Cannot Exercise Their Rights

Pursuant to Article 28 of the Law, the following cases are excluded from the scope of the Law, and therefore the persons concerned cannot assert their rights listed in 10.1.1 in these matters:

- Processing of personal data for purposes such as research, planning, and statistics by rendering it anonymous through official statistics.
- Processing of 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.
- Processing of personal data within the scope of preventive, protective, and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public safety, public order, or economic security.
- Processing of personal data by judicial authorities or enforcement authorities in relation to investigation, prosecution, trial, or enforcement proceedings.
- Pursuant to Article 28/2 of the Law, in the following cases, the relevant persons cannot assert their other rights listed in 10.1.1, except for the right to request compensation for damages:
 - The processing of personal data is necessary for the prevention of crime or for criminal investigation.
 - The processing of personal data made public by the personal data owner.
 - Where the processing of personal data is necessary for the performance of supervisory or regulatory tasks or disciplinary investigations or prosecutions by public institutions and organizations authorized and empowered by law, as well as by professional organizations with public institution status.
 - Where the processing of personal data is necessary for the protection of the economic and financial interests of the State in relation to budget, tax, and financial matters.
- Processing of personal data by public institutions and organizations with public institution status, as well as professional organizations with public institution status,



10.1.3. Exercising the Rights of Data Subjects

Relevant individuals may submit their requests regarding the rights listed under Section 10.1.1 of this document by completing the application form available at the <https://www.turquoisehotel.com/> address below, accompanied by information and documents verifying their identity, using the methods specified below or other methods determined by the Personal Data Protection Board. A wet-signed copy of the form must be submitted in person or via a notary public to the following address: Taşyaka Mahallesi, İnönü Caddesi, No:76 Fethiye/Muğla.

For third parties to submit requests on behalf of the relevant persons, a special power of attorney issued by a notary public on behalf of the person making the request must be provided by the data owner.

10.1.4. Data Subject's Right to File Complaint with the Personal Data Protection Board

The data subject may file a complaint with the Personal Data Protection Board within thirty days from the date they learn of the Company's response, and in any case within sixty days from the date of the request, in cases where the request is rejected, the response is deemed insufficient, or no response is provided within the specified timeframe, as required by Article 14 of the Law.

10.2. Company's Response to Applications

Requests regarding personal data processing activities must be submitted to the Company. The Company will respond to requests submitted to it in accordance with the communication requests included in the form. If a request is made without using the request form, the Company may respond to the request made by the relevant person via notary or by mail.

10.2.1. Information the Company May Request from the Data Subject Making the Request

The company may request information from the relevant person to determine whether the applicant is the owner of the personal data. The company may ask the owner of the personal data questions regarding their application in order to clarify the matters contained therein.

10.2.2. The Company's Right to Reject Data Subject's Request

The company may reject the applicant's application in the following cases, explaining the reasons:

- Processing of personal data for purposes such as research, planning, and statistics by rendering it anonymous through official statistics.
- Processing of 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, or personal rights, or constitute a crime.
- Processing of personal data within the scope of preventive, protective, and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public safety, public order, or economic security.
- Processing of personal data by judicial authorities or enforcement authorities in relation to investigation, prosecution, trial, or enforcement proceedings.
- Processing of personal data is necessary for the prevention of crime or for criminal investigation.
- Processing of personal data made public by the data subject themselves.
- Processing of personal data by competent and authorized public institutions and organizations, as well as professional organizations with public institution status, based on the authority granted by law, where necessary for the performance of their supervisory or regulatory duties and for disciplinary investigations or prosecutions.
- The processing of personal data is necessary for the protection of the economic and financial interests of the state.



- The data subject's request may interfere with the rights and freedoms of others.
- The request requires disproportionate effort.
- The requested information is publicly available.
- The information requested is publicly available.