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| | SAFEGUARDING OF PERSONAL DATA | Version | 1.2 |
| | | Initial Issue Date | 13.02.2024 |
| | Personal Data Processing and Protection Policy | Last Update | |
| | | Page | 1 of 34 |

ASTAŞ – YAPI VE YAPI ADI ORTAKLIĞI (ORDINARY PARTNERSHIP)

PERSONAL DATA PROCESSING AND PROTECTION POLICY

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1. PREAMBLE

Personal Data gained major significance especially as a result of the digital age and technological developments in the last 30 years, whereupon regulations were made particularly in the Constitution and the Turkish Penal

Code, and the draft Personal Data Protection Law No. 6698 (“KVKK”) was accepted by the Grand National Assembly of the Republic of Türkiye and was enacted upon being published in the Official Gazette No. 29677 dated 7 April 2016.

ASTAŞ – YAPI VE YAPI ADİ ORTAKLIĞI (the “Company” or “Ordinary Partnership”) fulfils its obligations under KVKK with regard to processing, erasing, destroying, anonymizing and transferring personal data, providing clarification to the data subject and ensuring security of data under the principles set forth in KVKK.

Prepared in accordance with KVKK, this Personal Data Processing and Protection Policy (the “Processing Policy”) is provided to natural persons whose personal data is processed (“Data Subject”).

2. PURPOSE AND SCOPE

This Personal Data Processing and Protection Policy (the “Policy”) was prepared by the Ordinary Partnership in the capacity of Data Controller in order to establish the fundamental rules set forth with regard to processing personal data and duly protecting them pursuant to KVKK, secondary regulations, decisions and regulations of the Personal Data Protection Board (the “KVK Board”) and other relevant legislation, as well as their implementation.

This Processing Policy covers the following with regard to Personal Data that are processed by the Ordinary Partnership through entirely or partially automated means or, provided this is part of a data filing system, through non-automated means:

- General principles observed in the processing of Personal Data;
- Conditions for processing Personal Data;
- Methods of collecting Personal Data and legal grounds thereof;
- Groups of people whose Personal Data is processed (Data Subject Categorization);
- Categories wherein Personal Data of Data Subjects is processed (Data Categories) and examples of data types;
- Purposes for using Personal Data;
- Technical and administrative measures taken to ensure security of Personal Data;
- To whom and for what purpose(s) Personal Data may be transferred;

- Sharing of Personal Data with public agencies, organizations and authorities;
- Retention period for Personal Data; and
- Rights of Data Subjects regarding their Personal Data and how to exercise the said rights.

3. DEFINITIONS

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| Explicit Consent | means freely given, specific and informed consent. |
| Anonymization | means rendering personal data impossible to link with an identified or identifiable natural person, even through matching them with other data. |
| Processor | means the persons who process personal data within the organization of the data controller or in accordance with the authorization and instruction of the data controller, except for the persons or units in charge of technical storage, protection or backing up of data. |
| KVKK | means Personal Data Protection Law No. 6698. |
| Recording Media | means any environment containing personal data that are processed through entirely or partially automated means or, provided this is part of a data filing system, through non-automated means. |
| Personal Data | means any information relating to an identified or identifiable natural person. |
| Disposal of Personal Data | means erasure, destruction or anonymization of personal data. |
| Processing of Personal Data | means any operation which is performed on personal data, |

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| | wholly or partially by automated means or non-automated means which provided that form part of a data filing system, such as collection, recording, storage, protection, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization, preventing the use thereof. |
| Personal Data Storage and Disposal Policy | means the Personal Data Storage and Disposal Policy, which defines the matters with regard to maintenance and disposal of personal data as prepared by the ordinary partnership. |
| Erasure of Personal Data | means the process of making Personal Data inaccessible and non-reusable by any means for the Data Subjects. |
| Destruction of Personal Data | means the process of making personal data inaccessible, non-recoverable and non-reusable by any means by anyone. |
| KVK Board | means the Personal Data Protection Board. |
| KVK Authority | means the Personal Data Protection Authority. |
| Sensitive Personal Data | means data related to a person's race, ethnicity, political opinion, philosophical belief, religion, sect, or other beliefs, their appearance, affiliation with an association, foundation or union, their health, sexual orientation, criminal convictions and safeguards, and biometric and genetic data. |
| Periodic Disposal | means the erasure, destruction or anonymization process which is determined in the personal data storage and disposal policy and to be carried out periodically ex officio, in the event that all of the conditions for processing laid down in KVKK no longer exist. |
| Data Processor | means the natural or legal person who processes personal data on behalf of the data controller upon its authorization. |
| Data Filing System | means the filing system where personal data is processed by being structured according to specific criteria. |
| Data Owner / Data Subject | means the natural person, whose personal data is processed. |

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| Data Controller | means the natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data filing system. |
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4. PRINCIPLES ON THE PROCESSING OF PERSONAL DATA

When the Ordinary Partnership processes the personal data through entirely or partially automated means or, provided this is part of a data filing system, through non-automated means pursuant to its activities under the scope of this Policy, it does so pursuant to the following general principles as set forth in Article 4 of KVKK:

4.1. Ensuring that Personal Data is Processed in Accordance with the Law and in Good Faith

The Ordinary Partnership is aware that it when it processes Personal Data in the capacity of Data Controller, it has to do so in accordance with applicable legislation and rules of honesty pursuant to the Constitution and KVKK and to ensure protection thereof, and it adapts to the applicable legislation regarding the protection of Personal Data as well as any modifications to be made therein, and takes utmost security measures to prevent Personal Data from being processed in a way that is contrary to the law and good faith.

4.2. Ensuring that Personal Data is Accurate and Up-to-Date When Required

The Ordinary Partnership takes all necessary technical and administrative measures to ensure the Personal Data it processes are accurate and up-to-date. Personal Data processed by the Ordinary Partnership in the capacity of Data Controller are modified, updated and stored upon request of the Data Subject, and are erased upon expiry of the term of storage set out in the relevant legislation or, if there is no provision in the relevant legislation with regard to term of storage, then upon expiry of the term of storage determined by the Ordinary Partnership in accordance with the sectoral convention, pursuant to the Personal Data Storage and Protection Policy.

4.3. Ensuring that Personal Data is Processed for Specific, Clear and Legitimate Purposes

The Ordinary Partnership processes Personal Data pursuant to the provisions of the relevant legislation, to the extent necessary in connection with its operations and provided this is limited to its legal obligations, in accordance with the law. Moreover, the Ordinary Partnership lays down its purposes of processing in a clear and definitive manner before starting to process, makes the necessary notifications to Data Subjects and fulfils its Duty of Disclosure.

4.4. Limited and Reasonable Processing of Personal Data in Connection with the Purpose for Which They Are Processed

Data processed by the Ordinary Partnership are processed in connection with the purposes that were determined in advance and with limitations pursuant thereto, to the extent this is necessary for realizing said purpose. Any processing of personal data that is not relevant to the purpose of processing or is not needed or required for realizing said purpose is avoided. In this regard, processing of data is limited to the legal obligations of the Ordinary Partnership under the relevant legislation and the operations of the Ordinary Partnership.

4.5. Processing of Personal Data for the Duration as Provided for in the Applicable Regulations or as Required by the Purpose of Processing

The data processed by the Ordinary Partnership are maintained according to the durations set out in the provisions of the relevant legislation or, if there is no such provision in the relevant legislation, for the durations determined by the Ordinary Partnership according to the sectoral convention pursuant to the requirements of the purpose of processing, and the Personal Data is erased, destroyed or anonymized by the Ordinary Partnership at the end of said term. Necessary administrative and technical measures were taken in this regard, and the procedures with regard to storage and disposal of Personal Data were explained in detail in the Personal Data Storage and Protection Policy.

5. METHODS OF AND LEGAL GROUNDS FOR COLLECTING PERSONAL DATA

The Ordinary Partnership collects the personal data that it processes pursuant to its operations through e-mail, mail, websites, social media accounts, fax, phone, notices received from administrative and judicial authorities and other means of communication, in audio, electronic or written format, either from the data subject themselves or from third persons, in accordance with the conditions of processing personal data set out in KVKK pursuant to the legal grounds specified in this Processing Policy.

6. CONDITIONS FOR THE PROCESSING OF PERSONAL DATA

Personal Data is processed upon determining the relevant condition in compliance by the Ordinary Partnership with the conditions of processing Personal Data as set out in Article 5 of KVKK and Article 20 of the Constitution. The conditions for the processing of Personal Data by the Ordinary Partnership are as follows;

6.1. Explicit Consent of the Data Subject

As a rule, Personal Data cannot be processed without explicit consent of the Data Subject pursuant to the stipulations in KVKK. Accordingly, if the Personal Data to be processed pursuant to the relevant activity is subject to the condition of explicit consent, the Ordinary Partnership processes the personal data with the free will of the Data Subject pursuant to their statement of explicit consent given in relation to a specific subject and in line with disclosure, providing disclosure to the Data Subject at the time of obtaining their personal data.

While there is no specified method of obtaining the statement of explicit consent pursuant to KVKK, the Ordinary Partnership obtains the statement of explicit consent in writing for the personal data it obtains through physical means, and in the electronic environment by further obtaining active approval of the Data Subject (the opt-in method) for personal data obtained through electronic means, to the extent possible.

Situations where Personal Data shall be processed without seeking consent of the Data Subject according to Article 5 of KVKK are provided below;

6.2. Clear Stipulation in Applicable Legislation

Personal data that have to be processed due to the regulations in the law and the relevant legislation, which we are required to comply with pursuant to the operations carried out by the Ordinary Partnership, may be processed without seeking the explicit consent of the Data Subject.

For example, (i) The data provided in the statements of employment of our employees pursuant to the notifications to be made for them to the Social Security Institution may be processed by the Ordinary Partnership without seeking explicit consent of our Employees.(ii) If invoice is issued under the scope of our relations with our Business/Solution partners or Customers, the data provided in the invoice may be processed by the Ordinary Partnership without seeking explicit consent.

6.3. Safeguarding of Life and Bodily Integrity due to Physical Impossibility

If it is necessary to protect the life or bodily integrity of someone else or the person themselves, who is not in a state to express their consent due to physical impossibility or whose consent has no legal validity, the Personal Data may be processed without seeking explicit consent.

For example, if one of our visitors has an accident in the area where works are conducted within the organization of the Ordinary Partnership, details such as blood type may be processed prior to medical response for this purpose.

6.4. Direct Relation to Establishment or Performance of the Agreement

Provided this is directly related to the establishment or performance of an agreement, if it is necessary to process personal data belonging to the parties to the agreement, the Personal Data may be processed without seeking explicit consent.

For example, our Employees' Bank Account Details may be processed without seeking explicit consent to pay their earned fees under the scope of the labor contract.

6.5. Fulfilment of Our Statutory Obligations

Personal Data may be processed without seeking explicit consent if this is required for fulfilling our statutory obligations as data controller.

E.g. Sharing information with regard to Personal Data in case of inspections being performed in areas such as Tax, Competition or Occupational Health and Safety.

6.6. Publicization of Personal Data by Data Subject

Processing can be performed without seeking explicit consent if Personal Data were made public by the Data Subject themselves.

E.g. the Employee declaring their contact details for emergency, or a Business/Solution Partner making their contact details public through a business card.

The Ordinary Partnership makes a point of observing the purpose of publicization in the processing of data that was publicized by the Data Subject and refraining from processing personal data for purposes outside of the purpose of publicization.

6.7. Requirement of Processing for the Establishment or Protection of a Right

The joint partnership may process Personal Data without seeking explicit consent if processing data is required for establishing, exercising or protecting any rights.

E.g. Keeping the necessary personal details of an Employee who quit their job for the duration of limitation of legal action.

6.8. Requirement of Data Processing for the Legitimate Interests of the Ordinary Partnership as the Data Controller

The Ordinary Partnership may process Personal Data without seeking explicit consent of the Data Subject if processing data is required for pursuing its legitimate interests, provided this will not bring prejudice to the basic rights and freedoms of the Data Subject.

For example, (i) Data may be processed without seeking explicit consent for purposes such as implementing prizes and bonuses that increase employee loyalty or for performance evaluation. (ii) Processing data of our visitors such as date of visit and the person visited will be considered under this scope.

7. CONDITIONS FOR THE PROCESSING OF SENSITIVE PERSONAL DATA

Pursuant to the definition made in Article 6 of KVKK, Sensitive Personal Data is considered limited contrary to Personal Data, and they refer to data related to a person's race, ethnicity, political opinion, philosophical belief, religion, sect, or other beliefs, their appearance, affiliation with an association, foundation or union, their health, sexual orientation, criminal convictions and safeguards, and biometric and genetic data.

Sensitive Personal Data processed by the Ordinary Partnership pursuant to Decision No. 2018/10 dated 31/01/2018 regarding “Adequate Measures that Need to be Taken by Data Controllers in the Processing of Sensitive Personal Data” issued by the Personal Data Protection Authority are processed as follows pursuant to the rules set out in this Personal Data Processing Policy.

As a rule, pursuant to KVKK, just as in the case of Personal Data, processing sensitive personal data without the explicit consent of the Data Subject is forbidden. At the point of processing Sensitive Personal Data without seeking explicit consent, the Ordinary Partnership distinguishes between data Regarding Health and Sexual Life, and Sensitive Personal Data Other Than Health and Sexual Life.

The Sensitive Personal Data processed by the Ordinary Partnership are processed under the conditions listed in this article in accordance with KVKK and the Regulation on the Processing of Personal Health Data and Ensuring Their Privacy issued in the Official Gazette No. 29863 dated 20 October 2016.

7.1. Processing Data Relating to Health and Sexual Life

As a rule, Personal Data Regarding Health and Sexual Life may be processed if there is explicit consent. Personal Data Regarding Health and Sexual Life may be processed, without explicit consent, by persons who are under duty to maintain confidentiality or by authorized bodies and organizations, only for the following purposes:

- Protection of public health;
- Preventive medicine;
- Medical diagnosis;
- Carrying out treatment and maintenance services; and
- Ensuring the financing with health services is planned and managed

7.2. Processing Sensitive Personal Data Other Than Health and Sexual Life

As a rule, personal data other than health and sexual life may only be processed if there is explicit consent.

In cases where provisions of the legislation allow processing of sensitive personal data, the sensitive personal data of the Data Subject other than their health and sexual life may be processed by the Ordinary Partnership without seeking explicit consent.

In this case, the processing activities conducted by the Ordinary Partnership shall be limited to the requirements of the provision of the relevant law.

7.3. Precautions for the Processing of Sensitive Personal Data

The Ordinary Partnership is responsible for taking the adequate measures specified by the Board in addition to observing the aforementioned matters in the processing of Sensitive Personal Data. In this regard:

- In particular, our Employees' Sensitive Personal Data is kept separate from their personal files and access by unauthorized persons is limited.
- In the physical environments where Sensitive Personal Data is processed, kept and/or accessed (Archive room, Office cupboards, drawers, etc.):
 - Adequate security measures (against situations such as electric leakage, fire, flooding or theft) are taken depending on the nature of the environment where sensitive personal data is kept.
 - Sensitive Personal Data is separated from the archive rooms where Personal Data is kept and are maintained in a separate archive room which is monitored with a CCTV surveillance system to the extent of the physical capabilities of the Ordinary Partnership.
- Necessary measures are taken to prevent unauthorized entrance and exit to and from these environments.
- In cases where Sensitive Personal Data processed by the Ordinary Partnership are kept/accessed in electronic/digital environments;
 - Necessary steps are taken to store data using encrypting methods.
 - Regular follow-up is made regarding security updates of the environments where data is kept, necessary security tests are regularly made or procured, and records of test results are kept.
 - Use of minimum two-step authentication systems is ensured where remote access to data is required (such as using VPN).
- All of the following measures are taken in case sensitive personal data is processed:
 - Authorization matrices for employees
 - Access logs are stored on a regular basis
 - Locked / encoded / encrypted system logins
 - Log entries are protected from user intervention
 - Secure encryption is used for sensitive private data
 - Data requiring remote access is accessed through a two-step authentication system

- Follow-up of security updates is made for the software used in the environments where the data is kept
- The principles determined by the KVK Board are observed with regard to taking security measures for the protection of Sensitive Personal Data

8. DATA CATEGORIES & EXAMPLES OF DATA TYPES

Personal data processed by the ordinary partnership are classified as Upper Category and Lower Category and are provided for the information of Data Subjects as follows. The categories provided in the table below are provided as examples, and the necessary disclosure to Data Subjects regarding any data processed by the Ordinary Partnership is made through our disclosure forms.

| Personal Data Category | Personal Data Sub-Category | Data Subject Category |
|---------------------------------------|---|--|
| Identification Details | Details such as Full Name, Turkish Id Number, Marital Status, Date of Birth, Sex, Mother's Name, Father's Name, Nationality, Tax Id No, ID Photocopy (All Details Provided on the ID), Passport Photo, Marriage Certificate, Copy of Identity Register Certificate or Driver's License, containing data regarding identification details of the person, used for matching the natural person. | Employee, Prospective Employee, Land Owner Natural Person, Business/Solution Partner Officer, Engaged Natural Person, Company Officer, Visitor |
| Contact Details | Details such as Address (home/work), E-Mail, Phone / Mobile, Employee's Company Name, or Residence Certificate, that allow contacting the person via digital or physical means, used for matching the natural person. | Employee, Prospective Employee, Land Owner Natural Person, Business/Solution Partner Officer, Company Officer, Engaged Natural Person |
| Economic and Financial Details | Details such as Annual Fixed Income, Employee's Fee, or IBAN Number for carrying out the operations of the Ordinary Partnership and providing for the interests of natural persons, used for doing follow-up of financial and other rights. | Employee, Prospective Employee, Land Owner Natural Person, Engaged Natural Person |

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| Legal Transaction Details | Authorized Signatures List, Lawsuit / Execution File Details, Salary Seizure Letters, Power of Attorney, Certificate of Inheritance, for carrying out our company's operations, fulfilling its legal obligations and protecting the legal interests of the data owner, used for matching natural persons | Employee, Company Officer, Land Owner Natural Person |
| Education and Job Details | Refers to information such as the Employee's Job, Employment Date, department, Employee group, Internal Duty and Responsibility Information, Employee Type (Operation/Office), Employee's Division/Unit, Workplace Registration Number, External Work Experience (Date of Starting and Quitting, Province of Employment, Reason of Quitting, Division in the Organization, Position, Company Name, etc.), Internal Work Experience Details (Initiation Transaction Type, Reason of Initiation, Ending Transaction Type, Reason of Ending, etc.), Reason of changing position, Graduation Details - Name of School, Graduation Information - Department, Past Salary Details, Salary Increase Details, Date of Change of Salary/Job, Certificate of No Objection to Working at Mildly Dangerous Jobs, Certificate of Completion of Military Service, Diploma, or Employment Certificate, regarding the data subject's career background, competencies and work life, for carrying out the company's operations and protecting the data subject's interests, used for matching the person. | Employee; Employee Candidate; Former Employee / Retiree |
| Physical Venue Details | Refers to information such as CCTV (Camera) Records in relation to the records and documents obtained during the time spent at | Employee; Visitor |

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| | the physical venue as well as during entrance to and exit from the physical venue in order to ensure the company's security and to maintain the interests of the Data Subject. | |
| Professional Experience Details | Refers to information such as Work Competence, Exam and Training Results, Graduation Details - School Name, Graduation Details - Department, Training Certificates processed to carry out the company's operations, maintain the interests of the company and its employees in the best and adequate way, and used for measuring employees' competence. | Prospective Employee |
| Personnel Information | Data such as MLA Form, Full Name, Address, Phone, Employee Workplace Registration Number, Employee Department, Employee's Job, Employee's Department Manager, Employee Off-Days Details and the Duration of Leave, Starting and Ending Dates of Leave, Employee's Director, Starting and Ending Dates of the Employee's Duty, Subject of the Duty, Assignment No., Date of Starting Work, Turkish Id No., Father's Name, Date of Birth, Place of Birth, SSI Registration No., Workplace Registration No., Work Starting Date, Date of Leaving, Employee's Income Tax Base, Income Tax Deduction, Date of Work Certificate, Employee's Division, Daily Net Fee, Gross Fee, Date of Quitting, Reason for Quitting, Severance Pay Starting Date, Basis Date for Severance Pay, Severance Pay Cap, Employee's Term of Service, Compensation to be Paid to the Employee, Overtime Details, Earned Fee Details, Notice Pay, Annual Leave Fee, Bank Account Details, Personnel Information, Compensation Payment | Employee |

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| | <p>Details, Court File No., Subject of Lawsuit, Attorney Details, and Compensation Payable Details are processed in order to obtain information for the purpose of establishing the personnel rights of employees or natural persons engaged by our company and fulfilling legal obligations. All the data processed in relation to the employee (excluding data regarding health information) are processed as personnel information.</p> | |
| Sensitive Personal Data | <p>Refers to data such as Medical History, Blood Type, Medical Status / Report, Analysis Details, Examination Results, Chronic Disease Information, Surgery History, Work Accident History, Occupational Disease Information, Disability Information, Ongoing Treatment Information, Physical Examination Details, Criminal Record, Chest Radiograph, Hearing Test, Blood Test, Blood Type Card, listed with limitations in KVKK and used for matching the natural person.</p> | Employee; Prospective Employee |
| Family Information | <p>Refers to data, in relation to the data subject's family members and relatives, Full Name of Spouse, Income Status of Spouse, Description Regarding Spouse Income, Spouse Work Status, Spouse ID Photocopy, Information Regarding Social Security of Spouse, Number of Children, Certificate of Education for the Children, Children's Full Name, Name of Father/Mother of the Children, Children's Gender, Children's Date of Birth, Children's Work Status, Children's ID Photocopy, Children's Marital Status, Children's Turkish ID No., and Dependents Other Than Spouse and Children (Stepchild, adopted child, grand child, children receiving alimony), for the purpose of carrying out the operations of the Ordinary Partnership, fulfilling legal obligations and protecting the legal interests of data owner, used for matching natural persons.</p> | Employee; Prospective Employee |

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| Social Life and Habits | Refers to information, with regard to social life and habits of the natural person other than the activities within the organization of the Ordinary Partnership, such as Habits/Activities, Smoking and Alcohol Use, Hobbies and Interests, Sports Branches that the Person is Interested In, Social Media Accounts, and Details of Club Memberships. | Prospective Employee |
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9. EXAMPLES OF CATEGORIES OF DATA SUBJECTS WHOSE DATA IS PROCESSED

| Personal Data Owner | Description |
|---|---|
| Employee | Natural persons engaged under a service contract with the Ordinary Partnership |
| Prospective Employee | Natural persons who have not yet been engaged under a service contract with the Ordinary Partnership, but who applied to the Ordinary Partnership through digital or physical means or was contacted by the Ordinary Partnership and are being evaluated for possible work relationship |
| Visitor | Natural persons who entered the physical locations of the Ordinary Partnership for various purposes or who visited its websites |
| Business/Solution Partner, Supplier Shareholders, Employees and Officers | Natural persons working at organizations that have a business relation of any kind with the Ordinary Partnership, including shareholders and officers of said organizations |
| Engaged Natural Person | Outsourced service provider natural persons carrying out works requiring certain expertise and that have to be performed within the organization of the Ordinary Partnership for and on behalf of the Company |
| Ordinary Partnership Officer | Members of board of directors and other authorized natural persons of the Ordinary Partnership |

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| Land Owner Natural Person | Natural persons who own the lands forming the subject of the expropriation proceedings |
| Former Employee / Retiree | Natural persons whose service contract with the Ordinary Partnership ended. |

10. PURPOSES OF THE PROCESSING OF PERSONAL DATA

While the purposes of processing Personal Data and/or Sensitive Personal Data which are processed in accordance with the legal grounds set out in Article 5 of KVKK are provided below, the purposes specified below may vary due to situations that arise as a result of the activities carried out by the Ordinary Partnership, and the Data Subject is informed of such Purpose of Processing Personal Data when a new purpose arises. The personal data collected by the Ordinary Partnership shall be processed in accordance with the principles set out in Article 4 of KVKK in line with the conditions and purposes of processing personal data as specified in Articles 5 and 6 thereof, for the purposes specified below:

10.1. Purposes of the Processing of Employees' Personal Data

Personal Data obtained by the Ordinary Partnership with regard to its Employees owing to its operations are processed for the following purposes:

- Managing Termination of Employment / Quitting Processes
- Planning and Executing Operational Activities that are Necessary for Ensuring the Ordinary Partnership's Activities are Carried Out in Line with the Procedures of the Ordinary Partnership and/or the Relevant Legislation
- Planning and/or Conducting Processes with Regard to Employees Starting to Work and/or Their Personnel Processes
- Planning and Executing Personnel Contract Termination Procedures
- Establishing and/or Performing the Contract / Contract Processes
- Maintaining the Employees' Fringe Benefits and Interests
- Carrying Out the Activities in Line with the Legislation
- Follow-Up and/or Supervision of Employees' Work Activities
- Supervision of the Holding Company and its Companies and Follow-Up of HR Processes
- Follow-Up of Legal Procedures
- Planning and Executing Business Activities
- Fulfilling Obligations Under Applicable Legislation and/or Labor Contract for the Employees of the Ordinary Partnership

- Planning and Maintaining the Fringe Benefits and Interests of the Employees
- Fulfilling the Employees' Labor Agreement and Legal Obligations
- Planning, Controlling and Executing Information Security Processes
- Conducting Physical Venue Inspection and Security
- Planning and Carrying Out Market Research Activities for the Sale and Marketing of Products and Services

10.2. Purposes of the Processing of Prospective Employee's Personal Data

The Personal Data obtained by the Ordinary Partnership with regard to its Prospective Employees owing to its operations are processed for the following purposes:

- Planning and/or Carrying Out the Application, Selection, Evaluation and Recruitment Processes of Prospective Employees
- Establishing and/or Performing the Contract / Contract Processes

10.3. Purposes of the Processing of Former / Retired Employees' Personal Data

The Personal Data obtained by the Ordinary Partnership with regard to its Former / Retired Employees owing to its operations are processed for the following purposes:

- Managing Termination of Employment / Quitting Processes

10.4. Purposes of the Processing of Personal Data of Officers of the Ordinary Partnership

The Personal Data obtained by the Ordinary Partnership with regard to the Officer(s) of the Ordinary Partnership owing to its operations are processed for the following purposes:

- Follow-Up of Legal Procedures

10.5. Engaged Natural Person

The Personal Data obtained by the Ordinary Partnership with regard to its Engaged Natural Persons owing to its operations are processed for the following purposes:

- Goods/Service Acquisition
- Carrying Out the Activities in Line with the Legislation

10.6. Purposes of the Processing of Personal Data of Officers of Business/Solution Partners

Personal Data obtained by the Ordinary Partnership with regard to the Officer(s) of its Business/Solution Partners owing to its operations are processed for the following purposes:

- Goods/Service Acquisition

10.7. Purposes of the Processing of Personal Data of Land Owner Natural Persons

Personal Data obtained by the Ordinary Partnership with regard to the Officer(s) of its Business/Solution Partners owing to its operations are processed for the following purposes:

- Follow-Up of Legal Procedures

10.8. Purposes of the Processing of Visitors' Personal Data

The Personal Data obtained by the Ordinary Partnership with regard to Visitors owing to its operations are processed for the following purposes:

- Creation and Follow-Up of Visitor Records

10.9. Other Purposes of the Processing of Data Obtained by the Ordinary Partnership

Apart from the aforementioned purposes of processing regarding data subject categories, the Ordinary Partnership may Process Personal Data for the following purposes under the scope of ensuring legal, technical and administrative work safety, carrying out business operations and planning business strategies pursuant to its operations:

- Emergency Management
- Execution and Supervision of Information Security Processes
- Prospective Employee / Intern / Student Selection and Recruitment
- Carrying Out the Application Processes of Prospective Employees
- Carrying Out the Employee Satisfaction and Loyalty Processes
- Fulfilling the Employees' Labor Agreement and Legal Obligations
- Maintaining the Employees' Fringe Benefits and Interests
- Carrying Out Inspection / Ethics Activities
- Carrying Out Training Activities
- Conducting Access Authorizations
- Carrying Out the Activities in Line with the Legislation
- Conducting Financial and Accounting Operations
- Company/Product/Service Loyalty Activities
- Conducting Physical Venue Inspection and Security
- Assignment Processes
- Keeping Records of Shareholders and Partners

- Follow-up of Legal Processes
- Internal Audit/Investigation/Intelligence Activities
- Providing Information in Case of Future Lawsuits
- Carrying Out Communication Activities
- Planning the Processes for Human Resources
- Carrying Out and Inspecting Business Operations
- Occupational Health and Safety
- Taking Measures to Improve Business Processes
- Establishing Business Processes
- Ensuring Public Safety
- Managing Profit and Loss
- Logistics/Shipping Operations
- Goods/Service Acquisition
- Goods/Service After Sale Support Services
- Conducting Goods/Service Sale Processes
- Goods/Service/Fee and Operations Processes
- Customer Relations Management
- Activities Regarding Customer Satisfaction
- Organization and Event Management
- Marketing/Analysis Operations
- Performance Evaluation Processes
- Advertising/Special Offer/Promotion Processes
- Conducting Risk Management Processes
- Storage and Archive Operations
- Granting Certificates and Permissions
- Making Insurance
- Social Responsibility and Civil Society Activities
- Establishing and/or performing the Contract / Contract Processes
- Sponsorship/Scholarship Activities
- Strategic Planning Activities
- Follow-Up of Requests/Complaints/Suggestions
- Ensuring Security of Movable Goods and Resources

- Supply chain management
- Taking a Performance Bond
- Conducting a Fee Policy
- Product/Service/Marketing Processes
- Ensuring Security of Data Controller Operations
- Foreign Personnel Work and Residence Permit Procedures
- Investment Processes
- Notifying Persons/Bodies and Organizations of Authority
- Conducting Management Activities
- Creation and Follow-Up of Visitor Records

Personal data processing activities to be performed under the scope of the aforementioned purposes may require explicit consent depending on the properties of the specific event. In this case, processes are implemented for obtaining explicit consent of Data Subjects in accordance with KVKK. If the Data Subjects do not provide explicit consent, the data may only be processed pursuant to the other processing conditions set out in the section titled Conditions of Processing Personal Data where personal data may be processed without obtaining explicit consent as specified in KVKK (“exceptional situations”) and for purposes that are in line with said conditions. In this case, only the duty of disclosure will be fulfilled without seeking explicit consent of the Data Subject.

11. TRANSFER OF PERSONAL DATA

The Ordinary Partnership may take the necessary security measures pursuant to the purposes of processing personal data and transfer the Personal Data and Sensitive Personal Data of Data Subjects to third party natural persons and/or legal entities. In this regard, the Ordinary Partnership acts in accordance with the regulations set out in Articles 8 and 9 of KVKK. With regard to transferring personal data, acting in accordance with the provisions of the relevant legislation and aligning transfer activities to the applicable provisions of the legislation is the responsibility of the Ordinary Partnership.

Processing Personal Data in accordance with the law shall not mean that they can be transferred directly, and whether the conditions set out in Articles 5 and 6 of KVKK shall be inquired for transferring Personal Data.

11.1. Domestic Transfer of Personal Data and Sensitive Personal Data

11.1.1. Domestic Transfer of Personal Data

Domestic transfer of Personal Data processed by the Ordinary Partnership requires one of the following conditions:

- Data Subject gives Explicit Consent for the transfer of Personal Data;
- The laws expressly provide for the transfer of personal data;
- Transfer of data is necessary to protect the life or bodily integrity of someone else or the person themselves, who is not in a state to express their consent due to physical impossibility or whose consent has no legal validity;
- Transfer of data is directly related to the establishment or performance of an agreement;
- Transfer of data is required for processing the personal data of parties to an agreement;
- Transfer of data is required for the fulfillment of the legal obligation of the data controller;
- Personal data is publicized by the data subject themselves;
- Transfer of data is required for the establishment, exercise or protection of a right;
- Transfer of data is required for the data controller's legitimate interests, provided this does not bring prejudice to the data subject's basic rights and freedoms;

11.1.2. Domestic Transfer of Sensitive Personal Data

The Ordinary Partnership may perform domestic transfer for the following legal reasons in relation to sensitive personal data pursuant to legitimate and lawful personal data processing purposes:

- Data subjects provides explicit consent; or
- Upon taking adequate measures if the data subject does not provide explicit consent:
 - The Data Subject's sensitive personal data except for health and sexual life (*race, ethnical origin, political opinion, philosophical belief, religion, sect or other beliefs, style of dress, memberships in foundations, associations or trade unions, criminal conviction, other data regarding security measures and biometric and genetic data*) **in cases established by applicable legislation;**
 - The Data Subject's sensitive personal data regarding their health and sexual life may only be transferred domestically by individuals under a confidentiality obligation or by authorized institutions and organizations for the purposes of **(i)** protecting public health, **(ii)** providing preventive medicine, **(iii)** giving medical diagnoses, treatment or care services, **(iv)** planning and managing healthcare services or financing such needs.

11.2. Overseas Transfer of Personal Data

The Ordinary Partnership does not transfer the Personal Data it processes in accordance with the principles set out in this Policy pursuant to its operations to any third person abroad. Data transfer/processing might occur through environments using overseas based cloud services or electronic environments using e-mail servers or overseas based

servers.

When overseas transfer of personal data is needed, the Ordinary Partnership may perform the overseas transfer of Personal Data that it processed in accordance with the fundamental principles with regard to processing of data upon taking the necessary measures pursuant to the purposes of processing Personal Data, in line with the conditions specified below;

11.2.1. The Data Subject Gives Explicit Consent for the Overseas Transfer of Personal Data

Pursuant to Article 9 of KVKK, overseas transfer of personal data is only possible if the data subject provides explicit consent for said transfer.

Therefore, checking for the condition of explicit consent is considered as the primary and required condition for any overseas transfer to be made by the Ordinary Partnership.

Article 9 of KVKK specifies the situations where Personal Data may be transferred abroad without seeking explicit consent. Accordingly;

11.2.2. Overseas Transfer of Personal Data by Meeting the Other Conditions Even if the Data Subject Does Not Provide Explicit Consent

Personal Data may be transferred abroad, if any of the following conditions occurs:

- (i) Transfer is clearly provided for in applicable legislation; (ii) Transfer of data is necessary to safeguard the life or bodily integrity of someone else or the person themselves, who is not in a state to express their consent due to physical impossibility or whose consent has no legal validity; (iii) Transfer of data is directly related to the establishment or performance of an agreement; (iv) Transfer of data is directly related to the establishment or performance of an agreement; (v) Transfer of data is required for the fulfillment of the legal obligation of the data controller, (vi) Personal data was publicized by the data subject themselves; (vii) Transfer of data is required for the establishment, exercise or protection of a right; (viii) Transfer of data is required for the data controller's legitimate interests, provided this does not bring prejudice to the data subject's basic rights and freedoms;
- If adequate protection is in place in the receiving country ("Countries with Adequate Protection" will be announced by the KVK Board);

- If there is no adequate protection in the receiving country, but the Data Controllers in Türkiye and in the receiving country warrant in writing an adequate protection and the KVK Board gives permission;

without seeking explicit consent of the Data Subject.

11.3. Overseas Transfer of Sensitive Personal Data

The Ordinary Partnership does not transfer the Personal Data it processes in accordance with the principles set out in this Policy pursuant to its operations to any third person abroad. Data transfer/processing through environments using overseas based cloud services or electronic environments using e-mail servers or overseas based servers

When overseas transfer of personal data is needed, the Ordinary Partnership may perform the overseas transfer of sensitive personal data that it processed in accordance with the fundamental principles with regard to processing of data upon taking the necessary measures pursuant to the purposes of processing Personal Data, in line with the conditions specified below:

11.3.1. Data Subject Gives Explicit Consent for the Overseas Transfer of Sensitive Personal Data

Pursuant to Article 9 of KVKK, overseas transfer of Sensitive Personal Data is only possible if the data subject provides explicit consent for said transfer.

Therefore, checking for the condition of explicit consent is considered as the primary and required condition for any overseas transfer to be made by the Ordinary Partnership.

Article 9 of KVKK specifies the situations where Sensitive Personal Data may be transferred abroad without seeking explicit consent. Accordingly;

11.3.2. Overseas Transfer of Sensitive Personal Data by Meeting the Other Conditions Even if the Data Subject Does Not Provide Explicit Consent

- Sensitive Personal Data Regarding Health and Sexual Life, for the purposes of (i) protection of public health, (ii) preventive medicine, (iii) carrying out medical diagnosis, treatment and maintenance services, (iv) planning and managing healthcare services or financing such needs, may be transferred abroad without seeking the condition of explicit consent by individuals under a confidentiality obligation or by authorized institutions and organizations, if adequate protection is in place in the receiving country (“Countries with Adequate Protection” will be announced by the KVK Board), or, if there is no adequate protection in the receiving country, but the Data Controllers in Türkiye and in the receiving country warrant in writing an adequate protection and the KVK Board gives permission.

- Sensitive Personal Data Other Than Health and Sexual Life may be transferred without seeking the condition of explicit consent in cases set out in applicable legislation and if adequate protection is in place in the receiving country (“Countries with Adequate Protection” will be announced by the KVK Board), or, if there is no adequate protection in the receiving country, but the Data Controllers in Türkiye and in the receiving country warrant in writing an adequate protection and the KVK Board gives permission.

11.4. Third Party Recipients of Personal Data and Purposes of Transfer

The Ordinary Partnership may transfer the Personal Data that it processes under the principles set out in this Policy to group companies, our business partners, shareholders, company officers, our suppliers, public/private agencies with legal authorization, private persons or organizations as well as third persons for the purposes mentioned below pursuant to the conditions of processing personal data as specified in Articles 8 and 9 of KVKK. Data may be transferred to third persons for the following purposes:

- Ensuring the objectives of foundation of the business partnership with the business partner are achieved;
- Realizing its operations carried out under the scope of the Ordinary Partnership’s corporate law, activity governance and corporate communication processes pursuant to the provisions of the relevant legislation;
- Ensuring the services outsourced from suppliers and needed for carrying out the business operations of the Ordinary Partnership are provided to us in full;
- Ensuring business operations requiring participation of the Ordinary Partnership, the companies they are party to and group companies are carried out;
- Designing strategies regarding business operations of the company and group companies, ensuring top-level management and excellent realization of inspections;
- Maintaining relations with employees and carrying out the activities in accordance with the legislation;
- Allowing business partners to perform the necessary examinations for compensating damage in case of any damage due to insurance policies;
- Following up legal processes and fulfilling the obligations in the relevant legislation; and

- Transferring information or documents requested by public and private bodies and organizations within their legal authority and for the other purposes specified in the Purposes of Processing Personal Data as set out in this Policy.

12. DATA SUBJECTS' RIGHTS

Article 10 of KVKK specifies that Data Subjects may apply to data controllers and make requests on the following matters with regard to themselves. In this regard, Data Subjects may complete the “*Application Form for Data Subjects whose Data is Processed*” prepared by the Ordinary Partnership, communicate it to us in writing and make requests on the following matters in relation to themselves:

- a) To find out whether your personal data has been processed,
- b) To request information if your personal data has been processed,
- c) To find out why your personal data has been processed and whether it has been used for the intended purpose,
- ç) To find out who the third parties to whom personal data is transferred within the country or abroad are,
- d) To request correction in the event personal data is processed incompletely or incorrectly,
- e) To request that personal data be erased or destroyed under the conditions as set out in Article 7 of KVKK,
- f) To make a request for third parties, to whom their personal data is transferred, to be informed of the transactions carried out in accordance with paragraphs (d) and (e),
- g) To object to the outcome of a result against you made through the analyzing of processed data exclusively via automatic systems,
- ğ) To request the elimination of losses in the event they face losses due to the illegal processing of personal data.

If the Data Subjects communicate their requests to the Ordinary Partnership using the methods specified, the Ordinary Partnership will conclude the request as soon as possible and in any case within thirty days at the latest free of charge depending on the nature of the request. But, if the procedure requires an additional cost, the fee determined by the KVK Board will be charged by the Ordinary partnership. The Ordinary Partnership provides the necessary awareness within the organization of the Company with regard to evaluation of and timely reply to applications of Data Subjects.

If the Data Subject's application is rejected, or if the Data Subject is not satisfied with the reply, or if the application is not answered in timely manner, Data Subjects may file a complaint to the KVK Board within 30 days from the date of learning about the reply and in any case within 60 days from the application date.

The Ordinary Partnership may reject the request of Data Subjects in the following situations, reserving other

situations that it shall justify:

- The processing of personal data for purposes such as study, planning and statistics after anonymizing it with official statistics;
- The processing of personal data for art, history, literature or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public security, public order, economic security, right to privacy or personal rights, or constitute a crime;
- The processing of personal data within the scope of preventive, protective and intelligence-related activities carried out by public institutions and organizations assigned and authorized by law, aimed at ensuring national defense, national security, public security, public order, or economic security;
- The processing of personal data by judicial authorities or execution offices in relation to investigation, prosecution, adjudication, or execution procedures;
- Personal data processing is required to prevent a crime from being committed or for crime investigation;
- The processing of personal data publicized by the data subject themselves; and
- The processing of personal data being necessary for the protection of the State's economic and financial interests in relation to budget, tax, and financial issues.

13. OUR OBLIGATIONS AS A DATA CONTROLLER

Section 3, Articles 10 and 12 of KVKK regulate the obligations of the Data Subject. In this regard:

13.1. Duty of Disclosure

According to Article 10 of KVKK, in the capacity of data controller, the Ordinary Partnership is required to communicate the following to Data Subjects while obtaining Personal Data that it processes owing to its operations:

- a) The identity of the Data Controller, and, if any, their representative;
- b) The purpose for which the Personal Data will be processed;
- c) to whom and for what purposes the processed Personal Data can be transferred;
- ç) The method of and legal reason for collecting Personal Data; and
- d) The rights of the Data Subject as laid down in Article 11 of KVKK

At the time of obtaining the Personal Data that it processes pursuant to the obligations set out in this article and the principles laid down in this Policy, the Ordinary Partnership communicates the disclosure forms to Data Subjects in line with the data subject category in the electronic and/or physical environment depending on the environment where Personal Data will be obtained.

13.2. Security of Personal Data

In the capacity of data controller, pursuant to Article 12 of KVKK, the Ordinary partnership is required to take the necessary technical and administrative measures in order to (i) prevent unlawful processing of Personal Data, (ii) prevent unlawful access to Personal Data, (iii) safeguard the Personal Data.

In addition to processing personal data in accordance with the provisions of KVKK and the relevant legislation as well as the principles set out in this Policy, the Ordinary Partnership takes all technical and administrative measures to prevent Personal Data from being processed in a way that is contrary to those obligations.

13.2.1. Prevention of unlawful processing of Personal Data

The Ordinary Partnership established the necessary systems to prevent unlawful processing of personal data and assigned the relevant personnel to ensure the operation of these systems. The Ordinary Partnership keeps track of updates that might be made for technical or legal reasons and keeps the system up to date.

In this regard, the Ordinary Partnership;

- Reviewed the workflow processes in order to identify personal data processed by departments ensuring ordinary partnership activities are carried out, identified personal data processed pursuant to said processes and prepared a “*Personal Data Inventory*”. The inventory is monitored by the supervisors of the relevant department and is kept up to date. Inspection of the Personal Data Inventory and ensuring its compliance with KVKK is provided by officers empowered for the Protection of Personal Data.
- The Ordinary Partnership issues documents and provides training to inform its employees and increase their awareness under light of the regulations in the relevant legislation and KVKK by procuring professional support together with the support and supervision of the department managers/officers.
- The Ordinary Partnership revises the labor agreements of its employees and the policies and procedures provided to and signed by its employees in such way to reflect the regulations in KVKK, the requirement of ensuring the employees’ personal data is processed lawfully and the sanctions to be imposed in case of any breach thereof.

- The Ordinary Partnership restricts access to Personal Data in line with the purpose of processing and to the relevant personnel.
- The process from the processing until erasure of the data, carried out by the departments within the organization of the Ordinary partnership, is controlled through routine inspections.
- Access logs are kept with regard to personal data processed by the departments of the Ordinary Partnership.
- The data storage environments within the organization of the Ordinary Partnership are periodically inspected through outsourced professional support, and any vulnerabilities are fixed immediately.

13.2.2. Prevention of unlawful access to personal data

The Ordinary Partnership ensures security of the systems containing personal data using methods such as locked archive rooms, anti-virus software, firewall and penetration tests, taking both technically and legally appropriate measures to prevent unlawful access to Personal Data.

In this regard, the Ordinary Partnership;

- The Ordinary Partnership revises the labor agreements of its employees and the policies and procedures provided to and signed by its employees in such way to reflect the regulations in KVKK, the requirement of ensuring the employees' personal data is processed lawfully and the sanctions to be imposed in case of any breach thereof.
- The Ordinary Partnership restricts access to Personal Data in line with the purpose of processing and to the relevant personnel.
- The Ordinary Partnership performs periodical maintenance and updates of the systems it installed in order to prevent unlawful access to personal data and to ensure security of the Ordinary Partnership.
- The Ordinary Partnership makes access authorizations on department basis to prevent unlawful access to personal data, whereby it restricts access and authorizations of user accounts of department employees with regard to systems through which access to personal data is made, and restricts devices that have access to systems.
- Technical measures are taken in accordance with the technological developments and the measures taken are updated and renewed at sufficient and needed intervals.
- The data storage environments within the organization of the Ordinary Partnership are periodically inspected through outsourced professional support, and any vulnerabilities are fixed immediately.

- Access and authorization processes are implemented in adherence to measures determined by the Ordinary partnership on department basis, and if technical standards are introduced by KVKK and/or the KVK Board and/or the existing software and hardware fail to meet the expectations, the software and hardware solutions that will meet the introduced technical standards will be implemented by the Ordinary Partnership.
- The Ordinary Partnership offers the necessary protection by means of installing various software/hardware, in particular anti-virus programs to all the systems used while carrying out the operations that have access to personal data and implementing encryption procedures.
- The Ordinary Partnership carries out the necessary works in order to prevent leaks of accessed data if access is made from outside the Ordinary Partnership to processed personal data (such as procurement of maintenance or support services) and to avoid any risks.
- With possible future developments, the Ordinary Partnership will perform the necessary budget works to the extent of its capacity in order to employ personnel on technical matters regarding security of Personal Data.

13.2.3. Safeguarding Personal Data

The Ordinary Partnership takes both technically and legally appropriate measures to safeguard Personal Data, and ensures security of the systems containing personal data using methods such as taking measures against threats such as fire and flood in the physical and digital environments where personal data is stored, locking data kept on paper, using multi-step encryption methods and periodically changing passwords.

- The Ordinary Partnership takes the necessary measures to prevent external penetration to the systems containing personal data, backs up files to prevent loss of data and executes the necessary agreements with third persons to maintain data in line with KVKK.
- The Ordinary Partnership obtains commitments from the natural persons and/or legal entities it maintains business relations with, if it shares personal data with and/or transfers personal data to them owing to their relationship, by means of adding provisions to their agreement or executing a separate protocol, that they will act in accordance with the obligations set out in KVKK, that personal data shall not be disclosed, that personal data shall not be shared or transferred without the approval of the Ordinary Partnership, that personal data shall not be used unlawfully, that the confidentiality obligation regarding personal data shall continue even after their agreement comes to an end, and that necessary adequate security measures shall be taken to protect personal data, ensuring safeguarding of personal data.

In addition to the aforementioned measures, the Ordinary Partnership takes the necessary technical and administrative measures specified in the “*Personal Data Storage and Disposal Policy*” in order to (i) prevent unlawful processing of Personal Data, (ii) prevent unlawful access to Personal Data, (iii) safeguard the Personal Data.

14. REGISTRATION IN THE DATA CONTROLLERS REGISTRY (VERBİS)

Regarding whether the Ordinary Partnership is required to notify the Data Controllers Registry (VERBİS), which will be supervised by the KVK Board pursuant to Article 16 of KVKK and the Regulation on the Data Controllers Registry which was enacted upon being published on the official gazette numbered 30286 dated 30 December 2017, where such notification shall include:

- a) The identification and address details of the Ordinary Partnership and the companies that are party to the Ordinary Partnership,
- b) The purposes for which the personal data will be processed by the Ordinary Partnership,
- c) Explanations on the Data Subject group(s) whose data is processed and the data categories of these persons,
- ç) Buyers or buyer groups to whom personal data may be transferred by the Ordinary Partnership
- d) Personal data required to be transferred abroad by the Ordinary Partnership,
- e) Measures taken by the Ordinary Partnership with regard to Personal Data security,
- f) The maximum time required for the purpose which personal data is processed,

the Ordinary Partnership makes the necessary evaluation pursuant to the KVK Board Decision No. 2018/87 Dated 19/07/2018 with regard to “Data Controllers to be Exempted from the Obligation of Registering in the Data Controllers Registry”, examines the obligation of registering in VERBİS, and registers in VERBİS as data controller.

Even if the Ordinary Partnership becomes exempt from registration in VERBİS at any time, it shall check for any changes in that status, consider the limits of exemption established by the KVK Board as well as future changes and ensure fulfillment of the obligation of registration in VERBİS.

15. RETENTION PERIOD FOR PERSONAL DATA

If certain durations are set forth regarding storage of personal data in the relevant laws and legislation in relation to the Ordinary Partnership’s operations, it keeps the personal data it processed for the durations laid down in the provision of the relevant law.

If there is no provision in the relevant laws and legislation as to how long personal data is to be stored, the Ordinary Partnership keeps the processed personal data for the required duration determined according to sectoral convention and considering the characteristics of the operation that causes the processing of the personal data.

If the purpose of processing the personal data is no longer applicable and the duration of storage laid down by the relevant legislation and/or the Ordinary Partnership has expired, said data may only be kept for the purpose of constituting evidence in possible legal disputes and claiming and establishing the rights in relation to the personal data.

The Ordinary Partnership may not keep any personal data for longer than the determined period considering its possibility of being used in the future.

“Personal Data Storage and Disposal Policy” *provides detailed information on the storage periods of Personal Data processed by the Ordinary Partnership.*

16. YAPI VE YAPI İNŞAAT TAAH.SAN VE TİC. A.Ş. AND ASTAŞ GAYRİMENKUL YATIRIM VE TURİZM A.Ş. PROCESSING PERSONAL DATA THAT ARE PROCESSED BY GROUP COMPANIES

The Ordinary Partnership, and YAPI VE YAPI İNŞAAT TAAH.SAN VE TİC. A.Ş. AND ASTAŞ GAYRİMENKUL YATIRIM VE TURİZM A.Ş., which are parties to the ordinary partnership, may process the personal data that are processed by the Group Companies for the purpose of carrying out the operations of its own Companies and of Group Companies in accordance with their operations, objectives, principles, goals, strategies and corporate needs and for protecting the rights, interests and reputation of the companies expressly stated before.

If the personal data exchange between the Group Companies and the companies to which the ordinary partnership is a party takes place at the level of Transfer of Personal Data from Data Controller to Data Controller or from Data Controller to Data Processor under KVKK, the Group Company in question provides disclosure to the Data Subject at the time of obtaining their Personal Data that their personal data may be transferred to the ordinary partnership.

The companies party to the ordinary partnership / Group Companies will process and protect the data obtained from the ordinary partnership in accordance with KVKK, the regulations laid down in the relevant legislation, and the principles set out in this Processing Policy and *Personal Data Storage and Disposal Policy.*

17. DELETION, DESTRUCTION OR ANONYMIZATION OF PERSONAL DATA

Erasure, destruction and anonymization of Personal Data pursuant to Article 7 of KVKK are performed according to the principles set out in the *Personal Data Storage and Disposal Policy* prepared by the Ordinary Partnership.

Upon expiry of the storage periods specified in the *Personal Data Storage and Disposal Policy* prepared by the Ordinary Partnership and if the reasons for processing data is no longer applicable, the Ordinary Partnership erases, destroys or anonymizes the personal data it processed according to the principles laid down in the *Personal Data Storage and Disposal Policy*.

If the Data Subject requests to exercise their rights set out in this Personal Data Processing Policy and Article 11 of KVKK, and the Ordinary Partnership deems it appropriate, the data in question are erased, destroyed or anonymized. The Ordinary Partnership reserves the right to process anonymized personal data in situations specified in Article 28 of KVKK titled exceptions for the purposes of research and statistics.

The Ordinary Partnership shall comply with the decisions of the KVK Board and all provisions of the legislation that are currently in force or will later take effect with regard to erasure, destruction and anonymization of processed personal data.

Personal Data Storage and Disposal Policy, which was prepared separately from this Policy provides detailed explanations about the methods regarding erasure, destruction or anonymization of personal data by the Ordinary Partnership and principles regarding storage of personal data.

18. UPDATES TO BE MADE ON THE PERSONAL DATA PROCESSING AND PROTECTION POLICY

The Ordinary Partnership reserves the right to make changes in the Personal Data Storage and Disposal Policy or this Personal Data Processing and Protection Policy due to changes in KVKK pursuant to decisions of the KVK Authority or emerging developments.

Any changes in this Personal Data Processing and Protection Policy are immediately included in the text and explanations regarding the changes are provided at the end of the Policy. Upon approval by the Ordinary Partnership, any updates to this Policy are published on the website www.mo-residencesetiler.com with the date of approval and revision, in the corporate intranet.

This Policy is routinely reviewed, normally on an annual basis, and is updated according to current legal and court practice developments. But, the Ordinary Partnership reserves the right to review this Policy at any time, make changes therein, and annul this Policy and create a new policy if it deems necessary.

The Board of Directors of the Ordinary Partnership is empowered to make decision on the annulment of the Policy.

19. TAKING EFFECT

This Policy on the Protection and Processing of Personal Data as well as any future updates will be published on www.mo-residencesetiler.com and will also be made available for access by our employees via the Ordinary Partnership's corporate intranet.