

İC İBRAHİM ÇEÇEN INVESTMENT HOLDİNG A.Ş.
PERSONAL DATA PROCESSING AND PROTECTION POLICY

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I. INTRODUCTION

Law No. 6698 on the Protection of Personal Data ("**Law**") entered into force on April 7, 2016 and includes regulations on the processing of all kinds of information regarding "*identified or identifiable*" natural persons ("**data subject**"). As IC İbrahim Çeçen Investment Holding A.Ş. ("**Company**"), we attach utmost importance to the processing and protection of personal data in accordance with the law and we act with this care in all our planning processes and activities. With this awareness, our Company takes all administrative and technical measures for the protection and processing of personal data. The most important pillar of this issue is the protection of the personal data of our Prospective Employees, Company Shareholders, Company Officials, Visitors, Employees, Shareholders, Officials and Third Parties of the Institutions we are in cooperation with, which is managed by this Processing and Protection of Personal Data Policy ("**Policy**").

According to Article 20 of the Constitution, everyone has the right to request the protection of personal data concerning him/her. Regarding the protection of personal data, which is a constitutional right, our Company pays due attention to the protection of the personal data of Prospective Employees, Company Shareholders, Company Officials, Visitors, Employees, Shareholders, Officials and Third Parties of the Institutions with which it cooperates and makes this a Company policy.

In this Policy, detailed explanations will be made regarding the basic principles listed below, which our Company has adopted in the processing of personal data:

- Processing personal data in accordance with the rules of law and integrity,
- Keeping personal data accurate and updated when necessary,
- Processing personal data for specific, explicit and legitimate purposes,
- Processing personal data in relevance to the purpose for which they are processed, and in a limited and measured manner,
- Retaining personal data for the period stipulated in the relevant legislation or for the period required for the purpose for which they are processed,
- Informing and enlightening personal data subjects,
- Establishing the necessary system for personal data subjects to exercise their rights,
- Taking necessary measures for the protection of personal data,
- Acting in accordance with the relevant legislation and the regulations of the Personal Data Protection Board ("**Board**") in transferring personal data to third parties in line with the requirements of the purpose of processing,
- Showing the necessary sensitivity to the processing and protection of sensitive personal data.

1. Purpose of the Policy

The purpose of this Policy is to inform personal data subjects – *our Prospective Employees, Company Shareholders, Company Officials, Visitors, Employees, Shareholders, Authorities and Third Parties of the Institutions we are in cooperation with* – about the obligations of our Company arising from the Law and other relevant legislation and the procedures and principles to be followed in accordance with the Law, and to protect the fundamental rights and freedoms of individuals to the maximum extent,

especially the right to privacy regulated in Article 20 of the Constitution. In line with the purpose of the Policy, we aim to ensure full compliance with the legislation in the processing and protection of personal data carried out by our Company and to protect the right to privacy and data security of personal data owners.

2. Scope of the Policy

This Policy relates to all personal data of our Prospective Employees, Company Shareholders, Company Officials, Visitors, Employees, Shareholders, Officials and Third Parties of the Institutions we are in cooperation with, which are processed automatically or non-automatically provided that they are part of any data recording system. To this end, the provisions of the Policy may be applied in whole or in part to the personal data subjects listed above.

3. Implementation of the Policy and Relevant Legislation

This Policy was formulated by concretizing and regulating the rules set forth by the legislation in force relevant to our Company's practices. In this context, the relevant legal regulations in force regarding the processing and protection of personal data shall primarily apply. In case of any incompatibility between the applicable legislation and this policy, our Company accepts that the applicable legislation shall prevail. As the Company, we maintain the necessary systems and make the required preparations to comply with the effective periods stipulated in the Law.

4. Enforcement of the Policy

The Policy was drafted by our Company and entered into force on April 8, 2016. The Policy is published on our Company's website www.icholding.com.tr.

II. PROTECTION OF PERSONAL DATA

The following measures and precautions are taken by our Company to ensure data security in accordance with Article 12 of the Law.

1. Security

Our Company takes all necessary technical and administrative measures to ensure the appropriate level of security in order to prevent unlawful access and processing of personal data and to ensure the protection of personal data in accordance with the Law.

2. Audit

Our Company carries out the necessary audits and has them carried out in order to establish the data security described above and to ensure the regularity and continuity of the measures taken. In this context, a team has been formed within the Company with one participant each from the HR, IT and Legal departments, and external support is also received.

3. Privacy

Our Company takes all necessary technical and administrative measures within the framework of technological means and implementation costs in order to ensure that the relevant data controllers and data processors do not disclose the personal data at their disposal to others in violation of the provisions of the Law and the Policy, and do not use them for purposes other than processing. In this context, our Company employees are informed and trained on the Law and the Policy.

4. Unauthorized Access to Personal Data

In the event that the personal data processed by our Company is obtained by others in ways that are not in accordance with the Law, our Company shall follow the necessary procedures to notify the relevant person and the Board as soon as possible. If deemed necessary by the Board, this situation may be announced on the Board's website or by any other method deemed appropriate by the Board.

5. Observing the Legal Rights of Data Subjects

Our Company observes all legal rights of data subjects regarding the implementation of the Policy and the Law and takes all necessary measures to protect the said rights.

6. Protection of Sensitive Personal Data

According to Article 6 of the Law, data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and attire, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data are sensitive personal data. Sensitive personal data are data that, if processed, carry the risk of causing discrimination or victimization against their subjects and should be protected much more strictly than other personal data. For this reason, although it is the main principle that such data are not collected by our Company

, all necessary measures are taken sensitively to protect such personal data processed in accordance with the law.

III. PROCESSING AND TRANSFER OF PERSONAL DATA

1. General Principles for Processing Personal Data

Personal data are processed by our Company in accordance with the procedures and principles stipulated in the Law and this Policy. While processing personal data, our Company acts in accordance with the following principles regulated by Article 4 of the Law.

a. Compliance with the Rules of Law and Integrity

Our Company processes personal data in accordance with the relevant legislation and the requirements of the rule of integrity and uses it within these limits. In this context, our Company takes into account the interests and reasonable expectations of the data subject when processing personal data and takes care to ensure that the data processing activity in question is conducted transparently for the data subject.

b. Ensuring Accuracy and Up-to-Dateness When Necessary

Our Company ensures that the personal data it processes is accurate and up-to-date, taking into account the fundamental rights and legitimate interests of personal data subjects. In this context, it carefully considers issues such as identifying the sources from which the data are obtained, confirming their accuracy, and assessing whether they need to be updated. Our Company keeps the channels open to ensure that the information of the data subject is accurate and up-to-date.

c. Processing for Specific, Explicit and Legitimate Purposes

Our Company processes personal data for legitimate purposes and shares the clearly and precisely determined purpose of data processing with the data subjects. Legitimate purpose means that the personal data processed by our Company is related to and necessary for the work it undertakes or the services it provides. In the disclosures made to the data subjects and in the explicit consents obtained, the purposes for which the data received from the data subjects are processed are clearly and explicitly stated.

d. Being Relevant, Limited and Proportionate to the Purpose of Processing

Our Company ensures that the personal data processed are suitable for the realization of the specified purposes and that personal data that are not related to the realization of the purpose in question or that are not needed are not processed. In this context, our Company does not process data to meet any needs that may arise at a later time.

e. Preservation for the Period Stipulated in the Relevant Legislation or Required for the Purpose for which Data are Processed

If there is a period stipulated in the relevant legislation for the storage of data, our Company

complies with these periods; otherwise, it retains personal data only for the period required for the purpose for which they are processed. The retention period of personal data varies according to the nature of the business carried out or service offered by our Company, or the nature of the data obtained.

In the event that all of the conditions for the processing of personal data by our Company disappear, it is destroyed in the first 6-month periodic destruction period following the date on which the obligation to destroy the data in question arises.

2. Terms of Processing Personal Data

As a rule, our Company does not process personal data without the explicit consent of the data subject. However, in the presence of one of the following conditions stipulated in Article 5/2 of the Law, personal data may be processed without seeking the explicit consent of the data subject.

a. It Is Expressly Provided for by the Laws

Our Company may process the personal data of personal data subjects even without their explicit consent in cases clearly stipulated by law. For example, the processing of personal data of our employees in accordance with the Labor Law legislation will be evaluated within this scope.

b. It Is Mandatory for the Protection of Life or Physical Integrity of the Person Himself/Herself or of any Other Person, who is Unable to Explain His/Her Consent due to Physical Disability or whose Consent is not Deemed Legally Valid

Personal data may be processed by our Company without explicit consent in order to protect the life or physical integrity of persons in cases where the person concerned is unable to disclose his/her consent due to actual impossibility or where the consent disclosed is not valid. For example, in a situation where the person is unconscious or mentally ill and his/her consent is not valid, the personal data of the person concerned may be processed during a medical intervention in order to protect his/her life or physical integrity. In this context, the processing of personal data of a person, whose liberty is restricted, through a telephone, computer or other technical device carried by the person himself/herself in order to locate him/her is not subject to the explicit consent of the person concerned.

c. Processing of Personal Data of the Parties of a Contract is Necessary, Provided that it is Directly Related to the Establishment or Performance of the Contract

Personal data may be processed by our Company in relation to the establishment or performance of a contract. For example, the account number of the creditor may be obtained for a payment to be made under a contract.

d. It is Mandatory for Compliance with a Legal Obligation to which the Data Controller is Subject

In the event that the processing of personal data is mandatory for our Company to fulfill its legal obligations, the necessary personal data may be processed by our

Company without the explicit consent of the data subjects. For example, during a tax audit by our Company, information belonging to our Employees or Customers may be submitted to the examination of the relevant public officials.

e. Personal Data Have Been Made Public by the Data Subject Himself/Herself

Personal data made public by the person concerned, in other words, personal data that have been disclosed to the public in any way and thus become known to everyone, may be processed by our Company on the assumption that the legal interest to be protected has disappeared in the processing of such data.

f. Data Processing is Mandatory for the Establishment, Exercise or Protection of any Right

In cases where data processing is mandatory for the exercise or protection of a legitimate right, our Company may process the personal data of the data subjects without seeking their explicit consent.

g. Provided that it Does not Harm the Fundamental Rights and Freedoms of the Data Subject, it is Mandatory for our Company to Process Data for its Legitimate Interests

Our Company may process the personal data of data subjects in cases where the processing of personal data is mandatory for pursuing legitimate interests, provided that it does not harm data subjects' fundamental rights and freedoms protected under the Law and Policy. Our Company shows the necessary sensitivity to comply with the fundamental principles regarding the protection of personal data and to sustain the balance between the interests of our Company and those of data subjects.

3. Terms for Processing Sensitive Personal Data

Our Company does not process special categories of personal data unless necessity arises and without the explicit consent of the data subject. However, personal data other than data on health and sexual life may be processed without the explicit consent of the data subject in cases stipulated by law. Personal data related to health are processed by our Company only for the purpose of protecting public health, conducting and managing medical diagnosis and treatment and care services, without seeking the explicit consent of the person concerned, under the conditions where we are under the obligation of confidentiality. Our Company follows the necessary procedures to take adequate measures determined by the Board in the processing of special categories of personal data.

4. Terms of Transferring Personal Data

Our Company may transfer personal data and special categories of personal data to third parties in accordance with the Law by establishing the necessary confidentiality conditions and taking security

measures in line with the purposes of processing personal data. Our Company acts in accordance with the regulations stipulated in the Law during the transfer of personal data. In this context, in line with the legitimate and lawful personal data processing purposes, our 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; If the data subject has given explicit consent,

- If there is a clear regulation in the laws regarding the transfer of personal data,
- If it is mandatory for the protection of the life or physical integrity of the person concerned or another person and the person concerned is unable to disclose his/her consent due to actual impossibility or his/her consent is not legally valid,
- If processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract,
- If personal data transfer is mandatory for our Company to fulfill its legal obligation,
- If the personal data has been made public by the data subject,
- If personal data transfer is mandatory for the establishment, exercise or protection of a right,
- If personal data transfer is mandatory for the legitimate interests of our Company, provided that it does not harm the fundamental rights and freedoms of the data subject.

Terms of Transfer of Personal Data Domestically/Abroad:

Our Company may transfer the personal data and sensitive personal data of the data subjects to third parties abroad by taking the necessary security measures in line with the purposes of personal data processing. Personal data may be transferred by our Company to foreign countries declared to have adequate protection by the Board in the light of Article 9 of the Law or, in the absence of adequate protection, to foreign countries where the data controllers in Turkey and the relevant foreign country undertake adequate protection in writing and where the Board's permission is granted.

IV. METHOD AND LEGAL BASIS FOR COLLECTING PERSONAL DATA, CLASSIFICATION, PURPOSES OF PROCESSING AND TRANSFERRING, TO WHOM PERSONAL DATA IS TRANSFERRED

1. Method and Legal Basis for Collecting Personal Data

Personal data are collected in all kinds of verbal, written, electronic media, by technical and other methods, through various means such as our Company's website, in order to fulfill the responsibilities arising from the laws within the framework of legislation, contracts, requests and request-based legal bases in order to fulfill the purposes set out in the Policy, and are processed by our Company or data processors assigned by our Company.

Classification of Personal Data

- **Identity Information:** Name-surname, Republic of Turkey ID number, marital status, nationality, parents' name-surname, place and date of birth, gender and other identity information and driver's license, identity card and passport, title deed and other documents containing this information, tax ID number, SSI number, signature information, vehicle license plate and other information.
- **Contact Information:** Telephone number (home, work, etc.), address, e-mail address, fax number, IP address and other information.
- **Information on Process Security:** Personal data processed regarding the technical, administrative, legal and commercial security of both the person concerned and the Company while carrying out the activities of the Company. For example, username and password for accessing the Internet.
- **Financial Information:** Personal data processed regarding information, documents and records showing all kinds of financial results arising in accordance with the employee-employer relationship established by the Company with the person concerned, and bank account number, branch code, bank card information, IBAN number, credit card information, financial profile, credit rating, asset data, income information and other information.
- **Visual and Auditory Information:** Photographs and camera recordings, voice recordings and any data and other information in which these data are located.
- **Personal Information:** All kinds of personal data processed for obtaining information that will serve as the basis for the protection of the personal rights of real persons who are in a working relationship with the person concerned.
- **Information on Location:** Information that identifies the location of the relevant person using the vehicles of the Company and the Company's group companies within the framework of the activities and operations of the Company or the Company's group companies or the companies and institutions with which cooperates; travel data and other information.
- **Information on Family Members and Relatives:** Identity information and contact information, as defined above, on the relevant person's family members, (e.g. spouse, mother, father, child), relatives and other persons who can be reached in case of emergency, within the framework of the activities and operations of the Company or the Company's group companies or companies and institutions with which the Company cooperates, or information collected in order to protect the legal and other interests of the Company and the relevant person.
- **Information on the Security of Physical Space:** Personal data relating to records kept and

documents obtained at the entrance to the physical space and during the stay in the physical space; camera recordings and records kept at the security checkpoint and other data.

- **Information on Legal Processes:** Data processed within the scope of the identification and follow-up of the Company's legal receivables and rights, and the performance of its debts and its legal obligations.
- **Sensitive Personal Information:** Data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and attire, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data as per Article 6 of the Law.
- **Information on Request/Complaint Management:** Personal data regarding the receipt and evaluation of the requests or complaints addressed to our Company.

2. Purposes of Processing Personal Data

Our Company shall use personal data in order to provide our services in accordance with the provisions of the relevant legislation and to improve the quality of these services, to undertake the activities stipulated by public authorities and/or listed as exceptions, to undertake the activities of the Company/Group Companies, to comply with information retention, reporting and information obligations, to plan and implement our human resources policies in the best way, to plan and execute our commercial partnerships and strategies correctly, to ensure the legal, commercial and physical security of our Company and our business partners, and to ensure the corporate functioning of our Company. In addition, our Company processes personal data within the scope of the terms of processing personal data specified in Articles 5 and 6 of the Law so that our Company may be visited, to ensure security and protect your legitimate interests during your visit, to ensure our Company can continue to offer its products and services, communicate about the products and services you have received/will receive in this regard, as well as use to ensure it can use such data for marketing activities and for offering services related to our Company's field of activity, such as product/service offers, modelling, reporting, scoring, risk monitoring, works on existing or new products and the identification of potential customers, and to improve such services and carry out other activities, to comply with the information obligations, to improve the services offered on our Company's website, to contact those who submit requests and complaints to our Company, and to rectify any errors on our Company's website.

3. Purposes of Transferring Personal Data

Your personal data are transferred under the terms specified in Articles 8 and 9 of the Law, limited to the purposes of planning and implementing our HR policies in the best possible way, correctly

planning and executing our commercial partnerships and strategies, ensuring the legal, commercial and physical security of our Company and our business partners, ensuring the corporate functioning of our Company, carrying out studies to ensure you benefit from the products and services offered by our Company in the best way; recommending the products and services offered by our Company to you by customizing them according to your demands, needs and requests, ensuring data security at the highest level, creating databases, improving the services offered on our Company's website, contacting those who submit requests and complaints to our Company, and rectifying any errors on our Company's website.

4. Persons to whom Personal Data will be Transferred

Your personal data may be transferred by our Company to our business partners, suppliers, group companies, affiliates, companies and institutions we cooperate with, companies from which we outsource services in order to fulfill our contractual or legal obligations (security, healthcare, occupational safety, law, etc. companies), authorized institutions and organizations. In this context, our Company observes that the units to which your personal data are transferred comply with the Law at the highest level.

V. PERSONAL DATA DESTRUCTION POLICY AND RETENTION PERIODS

1. Deletion, Destruction and Anonymization of Personal Data

Without prejudice to the provisions of other laws regarding the deletion, destruction or anonymization of personal data, despite the fact that the data have been processed in accordance with the provisions of the relevant law as regulated in Article 138 of the Turkish Penal Code No. 5237, Article 7 of the Law and the Regulation on the Deletion, Destruction or Anonymization of Personal Data ("**Regulation**") published in the Official Gazette of October 28, 2017, our Company deletes, destroys or anonymizes personal data ex officio or upon the request of the data subject in the event that the reasons requiring its processing disappear.

On the other hand, pursuant to Article 7 of the Regulation titled 'Principles', all transactions regarding the deletion, destruction and anonymization of personal data are recorded by our Company and such records are kept for at least 3 years, without prejudice to our other legal obligations.

With the **deletion of personal data**, such data is rendered inaccessible and non-reusable in any way for the relevant users. Accordingly, our Company, as the data controller, takes all necessary technical and administrative measures to ensure that deleted personal data is inaccessible and non-reusable for the relevant users.

Destruction of data refers to the destruction of materials suitable for storing data, such as

documents, files, CDs, floppy disks, hard disks, etc., in such a way that the information cannot be retrieved and used again.

Anonymization of data means that personal data cannot be associated with an identified or identifiable natural person, even if it is matched with other data.

2. Techniques for Deletion, Destruction and Anonymization of Personal Data

a. Techniques for Deletion and Destruction of Personal Data

Although it has been processed in accordance with the provisions of the relevant law, our Company may delete or destroy personal data based on its own decision or upon the request of the data subject if the reasons requiring its processing are completely eliminated.

Our Company may use the following methods for deletion and destruction:

- **Physical Destruction:** Personal data may also be processed by our Company in non-automatic ways, provided that they are part of any data recording system. When destroying such data, the system of physically destroying the relevant personal data in such a way that it cannot be subsequently accessed, used or retrieved by anyone is applied.
- **Sending to a Specialist for Secure Deletion** In some cases, our Company may engage a specialist to destroy personal data on its behalf. In this case, personal data can be securely destroyed by an expert.

b. Techniques for Anonymizing Personal Data

Anonymization of data means that personal data cannot be associated with an identified or identifiable natural person, even if it is matched with other data. As per Article 28 of the Law, anonymized personal data may be processed for purposes such as research, planning and statistics. Such processing is outside the scope of the Law and the explicit consent of the data subject will not be sought, and anonymization techniques specified by the authority¹ may be employed.

3. Timeframes of Retention and Periodic Destruction of Personal Data

Our Company stores personal data in accordance with the periods stipulated in the laws and other legislation. If there is no regulation in the laws and other legislation regarding the period for which personal data should be stored, personal data is processed for a period until the realization of the purpose of processing personal data within the scope of the activity carried out when our Company processes the personal data in question. These data are deleted, destroyed or anonymized on the first periodic destruction date and process following the date on which the destruction obligation arises.

Our Company has set **January 15-30** and **June 15-30** as periodic destruction dates in order to destroy personal data whose purpose of processing has expired. On these dates, personal data for

¹ [http://www.kvkk.gov.tr/yayinlar/Kisisel_Verilerin_Silinmesi_Yok_Edilmesi_veya_Anonim_Hale_Getirilmesi,](http://www.kvkk.gov.tr/yayinlar/Kisisel_Verilerin_Silinmesi_Yok_Edilmesi_veya_Anonim_Hale_Getirilmesi.pdf) pdf p.16 and others

which the reasons requiring processing no longer exist will be destroyed automatically, semi-automatically or manually.

VI. INFORMING IN TERMS OF THE PROCESSING OF PERSONAL DATA AND THE RIGHTS OF THE DATA SUBJECT UNDER THE LAW

1. Informing the Data Subject

In accordance with Article 10 of the Law and the provisions of the Communiqué on the Procedures and Principles to be followed in the Fulfillment of the Obligation to Inform published in the Official Gazette of March 10, 2018, our Company informs personal data owners – *data subjects* – during the acquisition of personal data. In this context, as stated above, the Company informs about the identity of the Company 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 data subject.

2. Rights of the Data Subject under the Law

Our Company informs you of your rights in accordance with Article 11 of the Law and the provisions of the Communiqué on the Procedures and Principles of Application to the Data Controller published in the Official Gazette dated of March 10, 2018, provides guidance on how to exercise such rights and undertakes the necessary internal functioning, administrative and technical arrangements for the said processes. Pursuant to Article 11 of the Law, our Company informs data subjects that they have right to;

- Learn whether their personal data is processed or not,
- Request relevant information if their personal data is processed,
- Learn the purpose of the processing of their personal data and whether or not it is used for the intended purposes,
- Know the third persons inside or outside the country to which their personal data is transferred,
- Request the correction of the processed personal data if it is incomplete or inaccurate,
- Request the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of the Law,
- Request notification of the transactions made pursuant to subparagraphs (d) and (e) of Article 11 of the Law to third parties to whom personal data are transferred,
- Object to any unfavorable outcomes against them as the data subject since the processed data was exclusively analyzed by automated systems,
- Request compensation for their damages in case they incur damages due to the processing of their personal data in violation of the law.

You may submit your requests regarding the implementation of the Law by using the **Personal Data Protection Law/Data Subject Application Form**, which you can access at www.icholding.com.tr, using the methods described in the application form. Pursuant to Article 13/2 of the Law, our Company finalizes the requests submitted to it free of charge as soon as possible and within thirty days at the latest, depending on the nature of the request. However, if the transaction in question requires an additional cost, the fee in the tariff determined by the Board may be charged.

Our Company may accept your request or reject it by explaining its reasoning and notify its response in writing or electronically. In the event that your application is rejected, you find the response inadequate, or your application is not responded to in due time, you have the right to file a complaint to the Board within thirty days from the date of learning about our response and in any case within sixty days from the date of application.

VII. CASES WHERE THE POLICY AND THE LAW WILL NOT BE FULLY FULLY OR PARTIALLY APPLIED

This Policy and the provisions of the Law shall not apply in the following cases pursuant to Article 28(1) of the Law:

- Processing of personal data by natural persons within the scope of activities related to themselves or their family members living in the same residence, provided that personal data are not disclosed to third parties and the obligations regarding data security are complied with.
- Processing of personal data for purposes such as research, planning and statistics by anonymizing them with official statistics.
- Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that such processing does not violate national defense, national security, public security, 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 security, public order or economic security.
- Processing of personal data by judicial or enforcement authorities in relation to investigations, prosecutions, trials or executions.

Provided that it is appropriate and proportionate to the purpose and fundamental principles of this Policy and the Law, Article 10 regulating the disclosure obligation of the data controller, Article 11

regulating the rights of the data subject with the exception of the right to demand compensation for any damage, and Article 16 regulating the obligation to register with the Data Controllers Registry shall not apply in the following cases pursuant to Article 28/2 of the Law:

- 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 himself/herself.
- Processing of personal data is necessary for the execution of supervisory or regulatory duties and disciplinary investigation or prosecution by the assigned and authorized public institutions and organizations and professional organizations in the nature of public institutions based on the authority granted by law.
- Processing of personal data is necessary for the protection of the economic and financial interests of the State in relation to budgetary, tax and fiscal matters.

VIII. CLASSIFICATION OF DATA SUBJECTS AND MATCHING THEM WITH PERSONAL DATA

1. Classification of Data Subjects

Only natural persons may benefit from the scope of the protection of this Policy and the Law in accordance with Article 3 of the Law. In this context, data subjects are classified as follows:

Prospective Employee: Real persons who have made a job application to our Company in any way or who have made their CV and related information accessible for review by our Company.

Group Company Customer: Persons whose personal data are obtained through IC İbrahim Çeçen Yatırım Holding A.Ş. Group Companies.

Company Business Partner, Shareholder, Official, Employee of Business Partner: Real persons with whom our Company has any kind of business relationship and all real persons, including employees, shareholders and officials of real and legal persons (such as business partners, suppliers) with whom our Company has any kind of business relationship.

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

Potential Customer: Real persons who have made a request for or indicated interest in using our products and services or who, in accordance with the rules of commercial practice and integrity, have been deemed to have such interest.

Company Employee: Real persons working for IC İbrahim Çeçen Yatırım Holding A.Ş. and its affiliated companies.

Company Shareholder: Shareholders of IC İbrahim Çeçen Yatırım Holding A.Ş. and its affiliated companies.

Company Official: Board members and other authorized persons of IC İbrahim Çeçen Yatırım Holding A.Ş. and its affiliated companies.

Third Person: Other persons who are not covered by the IC İbrahim Çeçen Yatırım Holding A.Ş. Policy prepared for Company Employees and who are not included in any category of data subjects in this Policy.

Visitor: All real persons who have entered the physical premises owned by our Company for various purposes or who visit our websites for any purpose.

2. Matching Personal Data with Data Subjects, Data Controller and Data Processors

The matching of the classified personal data, the definitions and scopes of which are given above, with the classified personal data subjects is presented below.

Data Categories	Data Content	Data Subject
<u>Identity information</u>	All information that clearly belongs to an identified or identifiable natural person and is processed partially or completely automatically or non-automatically as part of the data recording system, and is contained in documents such as Driver's License, Identity Card, Residence, Passport, Lawyer ID and Marriage Certificate	Company Shareholder; Company Official; Company Customer; Group Company Customer; Potential Customer; Company Business Partner; Shareholder, Official or Employee of Business Partners; Prospective Employee; Visitor; Third Party.
<u>Contact information</u>	Information such as telephone number, address and e-mail, which clearly belongs to an identified or identifiable natural person and is processed partially or completely automatically or non-automatically as part of the data recording system	Company Shareholder; Company Official; Company Customer; Group Company Customer; Potential Customer; Company Business Partner, Shareholder, Official or Employee of Business Partners; Prospective Employee; Visitor; Third Party.
<u>Customer information</u>	Information on the customer's officials or employees that clearly belongs to an identified or identifiable natural person and is processed partially or completely automatically or non-automatically as part of the data recording system, and is obtained as a result of our commercial activities and the operations carried out by our business units within this framework (customer number etc.)	Potential Customer; Customer; Visitor; Third Party.

<u>Customer transaction information</u>	Information that clearly belongs to an identified or identifiable natural person and is included in the data recording system, such as records for the use of our products and services and customers' instructions and requests required for the use of products and services	Potential Customer; Customer; Visitor; Third Party.
<u>Information on the security of physical space</u>	Personal data that clearly belong to an identified or identifiable natural person and are included in the data recording system, and are related to the records and documents (entry and exit logs, visit information, etc.) kept and obtained during entrance to the physical space and during the stay in the physical space	Company Shareholder; Company Official; Company Customer; Group Company Customer; Potential Customer; Company Business Partner, Shareholder, Official or Employee of Business Partners; Prospective Employee; Visitor; Third Party.
<u>Information on process security</u>	Your personal data (such as web site username and password information), which clearly belong to an identified or identifiable natural person and are included in the data recording system, and are processed for the purposes of ensuring the fulfilment of technical, administrative, legal and commercial obligations while conducting our commercial activities	Company Shareholder; Company Official; Company Customer; Group Company Customer; Potential Customer; Company Business Partner; Shareholder, Official or Employee of Business Partners; Prospective Employee; Visitor; Third Party.
<u>Risk management information</u>	Personal data that clearly belong to an identified or identifiable natural person and are included in the data recording system, and are processed employing methods used in accordance with generally accepted legal and commercial customs and good faith in these areas in order to manage our commercial, technical and administrative risks	Company Shareholder; Company Official; Company Customer; Group Company Customer; Potential Customer; Company Business Partner; Shareholder, Official or Employee of Business Partners; Prospective Employee; Visitor; Third Party.

<u>Financial information</u>	Personal data of Customer's officials or employees that clearly belong to an identified or identifiable natural person and are processed partially or completely automatically or non-automatically as part of the data recording system, regarding documents and records indicating all sorts of financial results of the Customer	Company Shareholder; Company Official; Company Customer; Group Company Customer; Potential Customer; Company Business Partner, Shareholder, Officer, Employee of Business Partners; Employee Candidate; Visitor, Third Parties.
<u>Personal information</u>	All kinds of personal data that clearly belong to an identified or identifiable natural person, processed partially or completely automatically or non-automatically as part of the data recording system and are processed for obtaining information that will serve as the basis for the formation of the personal rights of natural persons who are in a working relationship with the Company	Company Business Partner; Official or Employee of Business Partners; Prospective Employee; Third Party.
<u>Information on location</u>	Information that clearly belongs to an identified or identifiable natural person, processed partially or completely automatically or non-automatically as part of the data recording system and determines the location of the relevant person during the use of the Company's products and services within the framework of the operations carried out by the Company's business units, or the location of the employees of the institutions we cooperate with while using Company vehicles (GPS location, travel data etc.)	Company Shareholder, Official, Employee; Business Partner; Shareholder, Official, Employee of Business Partners.
<u>Sensitive personal information</u>	Information containing the race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, dress and attire, clothing, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and	Company Shareholder; Company Official; Company Customer; Group Company Customer; Potential Customer; Company Business Partner, Shareholder, Official or Employee of Business

	security measures, and biometric and genetic data, which clearly belong to an identified or identifiable natural person and is processed partially or completely automatically or non-automatically as part of the data recording system	Partners; Prospective Employee; Visitor; Third Party.
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Pursuant to Article 6 of the Regulation, the titles, units and job descriptions of those involved in the processes of storing and destroying personal data in our Company within the scope of the PDP Law are provided below.

Data Processing Units	Job Descriptions
Human Resources Unit / Personnel Directorate	<ul style="list-style-type: none"> • Interviewing Prospective Employees, • Storing employment contracts made with the Company's employees and their personnel files, • Preparing internal personnel regulations and distributing them to Employees.
Purchasing Unit	<ul style="list-style-type: none"> • Purchasing the products and services needed by the Company in line with the Company's objectives.
Legal Department	<ul style="list-style-type: none"> • Providing the legal infrastructure required by the Company's business and operations, • Undertaking the processes related to legal disputes concerning the Company.
Information Technologies Unit	<ul style="list-style-type: none"> • Taking the necessary measures for the security of the devices used in the Company,

	<ul style="list-style-type: none"> • Carrying out maintenance and repair works of the devices used and of software in particular, • Authorizing remote access to the devices, software and databases used, • As part of the contracts concluded for the maintenance, update, integration and repair of devices, software and databases, providing contracts with access to said devices, software and databases, managing, controlling and supervising them,
	<ul style="list-style-type: none"> • VPN routing and authorizations, • Interference with electronic devices.
Financial and Fiscal Affairs	<ul style="list-style-type: none"> • Recording salary information and payment information that should be known within the scope of personal rights of employees, • Recording information on the expenditures regarding the Company's activities.