

## **PRIVACY POLICY OF COIL PARTNERS BOBİNAJ SANAYİ VE TİCARET ANONİM ŞİRKETİ**

### **1. INTRODUCTION**

The protection of personal data is highly sensitive issue for Coil Partners Bobinaj Sanayi ve Ticaret Anonim Şirketi ("Company") and it is prioritized by our Company. The most important pillar of this issue is the protection and processing of the personal data of our employee candidate, Company shareholders, Company officials, visitors, as well as employees, shareholders and officials of the institutions we cooperate, and third parties. All of whom are governed by this policy. The Company's activities related to the protection of personal data of our employees are governed under the Personal Data Protection and Processing Policy, which is drawn up in line with the principles of this Policy.

The personal data in this context is processed in a fair and transparent manner in accordance with Article 12 of the Law No.6698 on the Protection of Personal Data ("Law" or "LPPD") and Article 5 of the European Union General Data Protection Regulation (GDPR). Our Company, takes the necessary technical and administrative measures to ensure that the appropriate level of security is maintained so as to prevent illegal processing of personal data, to prevent illegal access to data, as well as to ensure data retention; within this scope, it performs required inspections or has these inspections done.

According to Turkey's Constitution, everyone has the right to the protection of relevant personal data. As regards the protection of personal data, which is a constitutional right, the Company takes the necessary care to protect the personal data of employee candidates, Company shareholders, Company officials, visitors as well as employees, shareholders and officials of the institutions we cooperate, and third parties, all of whom are governed by this policy, and also renders such approach a company policy.

In this sense, the administrative and technical measures to be taken by the Company are examined in order to protect personal data processed in compliance with the relevant legislation. This Policy shall provide detailed explanations on the following basic principles adopted by the Company with respect to the processing of personal data:

- Processing of personal data in accordance with the rules of law and good faith,
- Processing of personal data for specific purposes,
- Ensuring personal data accuracy and up-to-dateness as required,
- Processing for specific, explicit and legitimate purposes,
- Being relevant with, limited to and proportionate to the purposes for which they are processed,
- Being retained for the period of time stipulated by relevant legislation or the purpose for which they are processed,
- Providing disclosure statement and informing the data subjects,
- Establishing the necessary system for exercising of the rights of data subjects,
- Taking measures to ensure the retention of personal data,
- Acting in accordance with the relevant legislation and the regulations of the Personal Data Protection Board (PDPB) while transferring personal data to third parties in accordance with the requirements of the purpose of processing,
- Showing the necessary sensitivity to the processing and protection of personal data of special nature,

You can get in contact with our Data Protection Controller at the following address:

Name - Surname / KAMİL TEKİN  
Mecidiye Mah. Selçuk Cad. No:25 Sultanbeyli/ İstanbul

Contact Number: 0212 312 20 00  
E-mail: info@coilpartners.com

## **2. PURPOSE OF POLICY**

The main purpose of this Policy is to provide information about the personal data processing activities and the systems adopted for the protection of personal data, which are conducted by the Company in a legal, transparent and fair manner, and in this context, to provide transparency through informing particularly our employees, employee candidates, Company shareholders, Company officials, visitors, customers as well as employees, shareholders and officials of the institutions we are cooperate with, and third parties, personal data of whom are processed by our Company.

## **3. SCOPE**

This policy relates to all personal data of our employees, employee candidates, Company shareholders, Company officials, visitors, customers as well as employees, shareholders and officials of the institutions we are cooperate with, and third parties, which are processed through automated means or through non-automated means provided that they are part of any data registry system.

The implementable scope of this policy for data subjects in the categories mentioned above may be the entire policy (e.g. employees and customers alike); or it may only be some part of provisions (i.e. only our employees).

## **4. IMPLEMENTATION OF POLICY AND RELEVANT LEGISLATION**

The relevant legal regulations in force regarding the processing and protection of personal data will prevail over this policy. The Company acknowledges and accepts that the applicable legislation will prevail over this policy if there would be any inconsistency between the legislation in force (the Law on Protection of Personal Data (LPPD) and European Union General Data Protection Regulation (EU GDPR)) and this policy. The policy is based on the reconstitution and rearrangement of the rules laid down by the relevant legislation within the scope of Company practices.

## **5. ENSURING SECURITY OF PERSONAL DATA**

The Company takes necessary technical and administrative measures, considering technological facilities and implementation costs, in order to ensure the legal processing of personal data.

**5.1. The technical measures taken to prevent the illegal processing of and access to personal data are listed as follows:**

- The personal data processing activities performed within the Company are controlled by the technical systems we have established.
- Technical personnel are employed in technical matters.
- Technical measures are taken in accordance with the developments in technology, the measures are updated and renewed periodically.
- Access and authorization means are in place in accordance with the legal compliance requirements determined for each business unit respectively.
- Access privileges are limited and reviewed regularly.
- Technical security systems are established for fixed storage, and technical measures taken are periodically reported to the person in charge pursuant of internal audit mechanism, and required technological solution is produced by reevaluating the risky issues.
- Required software and systems, including virus protection systems and firewalls are installed.
- The software used for storage of personal data is regularly scanned for security vulnerabilities. Discovered security vulnerabilities are fixed.

**5.2. The administrative measures taken to prevent the illegal processing of and access to personal data are listed as follows:**

- Employees shall be trained on technical measures to prevent unlawful access to personal data.
- In house access and authorization procedures for each department are developed and implemented in accordance with the legal compliance requirements.
- Employees are informed that they cannot disclose personal data, which are communicated to them, to third parties in breach of the provisions of the Law on Protection of Personal Data (LLPD) and that they cannot use them except for the purpose of processing and that these obligations will survive even after leaving job and the necessary commitments are obtained in this regard.
- The provisions concerning that the persons to whom personal data is transferred will take necessary security measures for data protection, and will ensure strict compliance with these measures in their institutions, are included into the contracts concluded with the persons to whom personal data are legally transferred.
- All activities performed by the Company are analyzed in detail for all business units, and as a result of this analysis, personal data processing activities are introduced in the commercial activities performed by the relevant business units.
- Personal data processing activities performed by company's business units are established as per the requirements to be fulfilled in order to ensure compliance of these activities with the personal data processing conditions enforced by the Law on Protection of Personal Data (LLPD) and the activities performed by each business unit.
- Awareness is created and implementation rules are determined for the relevant business units in order to meet the legal compliance requirements for each business units; The required administrative measures to ensure the audits and continuity of these particulars are implemented through internal policies and trainings.
- In addition to Company's instruction and the exceptions prescribed by the Law, the provisions on restrictions for personal data processing, disclosure, deployment are included into the contract and papers which regulates the

relation between Company and employees and employees' awareness is raised and audits are conducted thereof.

- The security of the personal data is ensured by the data protection controller responsible for processing of personal data in a legal, fair and transparent manner.

### **5.3. Audit of Measures Taken for Personal Data Protection and Measures to be Taken Against Unauthorized Disclosures**

Our Company performs the required audits within its own body or have them performed in accordance with Article 12 of the Law on Protection of Personal Data (LLPD) and Article 39 and 40 of European Union General Data Protection Regulation (EU GDPR). The results of these audits are reported to the concerned department in line with the Company's internal operation procedures, and required activities are performed to improve the measures taken.

In case that personal data processed in accordance with Article 12 of the Law on Protection of Personal Data (LLPD) and Article 39 and Article 40 of European Union General Data Protection Regulation (EU GDPR) are obtained by others through illegal means, our company operates a system that allows this situation to be notified to the concerned data subject (as per Article 19 of European Union General Data Protection Regulation (EU GDPR)) and the Personal Data Protection Board (PDPB) as soon as possible.

If deemed necessary by the Personal Data Protection Board (PDPB), this may be announced on the website of the Personal Data Protection Board (PDPB) or by any other appropriate means.

## **6. PROTECTION OF THE RIGHTS OF THE DATA SUBJECT; HOW TO TRANSFER THESE RIGHTS TO OUR COMPANY AND EVALUATION OF THE REQUESTS OF DATA SUBJECTS**

If data subjects submit their requests regarding the rights listed below (in accordance with Article 13 of the Law on Protection of Personal Data (LLPD) and Article 15 and Article 21 of European Union General Data Protection Regulation (EU GDPR)) to the Company, the Company concludes such requests within thirty days (one month pursuant to European Union General Data Protection Regulation (EU GDPR)), depending on the nature of the request, but without any charges. However, in the case that a fee is set forth by the Personal Data Protection Board (PDPB), the fee to be charged by our Company will be at the rate determined by Personal Data Protection Board (PDPB). Rights and requests of data subjects;

- To be informed whether his/her personal data are processed or not,
- To be informed about the legal basis of the processing activity as well as the purposes of processing of personal data (European Union General Data Protection Regulation (EU GDPR)),
- To request information regarding personal data if it has been processed,
- To learn the purpose of processing personal data and whether processed data is being used in accordance with its purpose,
- To acquire the identity and contact information of the controller and the representative of the controller, if applicable, (European Union General Data Protection Regulation (EU GDPR)),
- To be informed about the retention period of personal data or, if this is not possible, the criteria used to determine such period (European Union General Data Protection Regulation (EU GDPR)),

- The right to revoke the consent at any time without affecting the legality of processing prior to revocation of such consent in cases where processing is based on subparagraph (a) of Article 6(1) or subparagraph (a) of Article 9(2) (European Union General Data Protection Regulation (EU GDPR))
- The right of data subjects to restrict the processing of personal data under the conditions specified in Article 16 (European Union General Data Protection Regulation (EU GDPR)),
- The right to transmit this data to another controller without any hindrance by the controller to whom the personal data is initially provided, and the right to transmit this data to another controller without any hindrance by the controller to whom the personal data is initially provided (European Union General Data Protection Regulation (EU GDPR)),
- The right to not be subject to a decision based solely on automated processing, including profiling that has legal consequences for the data subject, or similarly affects the data subject to considerable extent (European Union General Data Protection Regulation (EU GDPR)),
- The right to know the third parties to whom personal data are being transferred within the country or abroad,
- The right to be informed pursuant to Article 14 in the cases where personal data is not obtained from data subject (European Union General Data Protection Regulation (EU GDPR)),
- Request correction of personal data in the case that it was processed incompletely or improperly, and request that the process carried out in this context to be notified to the third parties to whom the personal data had been transferred,
- The right of the data subject to request the controller to correct the incorrect personal data about them without undue delay (European Union General Data Protection Regulation (EU GDPR)),
- Request the deletion or destruction of personal data in the event that the reasons for its processing are no longer present, despite having been processed in accordance with the provisions of the Law on Protection of Personal Data (LLPD) and other related laws, and request that the process carried out in this context to be notified to the third parties to whom the personal data had been transferred,
- The right of the data subject to request the controller to correct (destruction/anonymization) the personal data about data subject without undue delay (European Union General Data Protection Regulation (EU GDPR)),
- Object to the occurrence of a result to the detriment of the person himself/herself, by means of analyzing the processed data exclusively through automated systems,
- The right of the data subject to object to the processing of relevant personal data at any time (European Union General Data Protection Regulation (EU GDPR)),
- To request compensation for the damage arising from the unlawful processing of his personal data.
- The right to submit complaints to an audit authority (European Union General Data Protection Regulation (EU GDPR)),

## **7. THE PROCESSING AND PROTECTION OF THE DATA OF SPECIAL NATURE.**

Personal data of special nature is regulated as follows in Article 6 of the Law No. 6698; *"Personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership to associations, foundations or trade-unions, health, sexual life, convictions and security measures, and the biometric and genetic data are deemed to be personal data of special nature."*

And in Article 9 of European Union General Data Protection Regulation (EU GDPR); "Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited."

And, personal data of special nature has a more protected and specific structure compared to the personal data of general nature.

The Company pays utmost attention to the protection of personal data of special nature, which are designated as "special" by the Law on Protection of Personal Data (LLPD) and European Union General Data Protection Regulation (EU GDPR) and processed in accordance with the law. Company complies with the regulations envisaged for the processing of data of special nature, pursuant to the provisions of Article 6 of the Law on Protection of Personal Data (LLPD) and Article 9 of European Union General Data Protection Regulation (EU GDPR).

It is prohibited to process the personal data of special nature without explicit, specific and express consent of the data subject.

Personal data, excluding those relating to health and sexual life, listed in the first paragraph may be processed without seeking explicit consent of the data subject, in the cases provided for by laws. Personal data relating to health and sexual life may only be processed, without seeking explicit consent of the data subject, by any person or authorized public institutions and organizations that have confidentiality obligation, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing.

Pursuant to European Union General Data Protection Regulation (EU GDPR);

If processing is required for the performance of the obligations of the controller or data subject with respect to protection of employment, social security and social law, however, provided that they are permitted within the framework of Union or Member State law or a collective agreement under Member State law, where appropriate guarantees for the fundamental rights and interests of the data subject are provided,

If processing is required for protection of the vital interests of the data subject or another natural person in cases where the data subject is unable to grant consent physically or legally,

If processing is done with respect to the persons who are in regular contact with members of organ or former members for their purposes during the legitimate activities of a foundation, union or non-profit organization with appropriate warrants for political, philosophical, religious or trade-union purposes and provided that it is relevant and that personal data is not disclosed other than the relevant organ without the consent of the data subjects,

The processing is related to personal data publicly disclosed by the data subject,

If processing is required for the benefit of public in the field of public health such as providing protection against cross-border threats against health or ensuring high quality and security standards for health services and medical products or medical devices in accordance with Union or member state Law, which are suitable for providing warrants with respect to the right and freedoms of the data subject, particularly professional privacy as well as specific measures thereof,

If processing is required for archiving purposes, scientific or historical research purposes or statistical purposes pursuant to Article 89 (1) based on Union or member state law, which provides specific and appropriate measures for ensuring fundamental rights and interests of data subject, being commensurable with purpose and respecting the essence of the personal data protection right,

Then, personal data can be processed.

It is stipulated that adequate measures determined by the Board are also taken while processing the personal data of special nature.

## **8. PROCESSING PERSONAL DATA ACCORDING TO THE LEGISLATION PRINCIPLES**

### **8.1. Processing in Accordance with Law and Good Faith**

The Company complies with the principles, general trust and good faith that are set forth by the legal norms in the processing of personal data. In this context, the Company does not use personal data for any purposes other than the intended abiding by the proportionality principles.

If the data subject has given consent to the processing of his or her personal data for one or more specific purposes; processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; processing is necessary for compliance with a legal obligation to which the controller is subject; processing is necessary in order to protect the vital interests of the data subject or of another natural person; processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child, then processing of personal data based on the foregoing is considered lawful. (European Union General Data Protection Regulation (EU GDPR)).

### **8.2. Ensuring Personal Data Accuracy and Up-to-Dateness As Required**

The Company pays utmost attention to ensure that the processed personal data is accurate and up-to-date and takes the necessary measures in accordance with the legislation therefor.

### **8.3. Processing for Specific, Explicit and Legitimate Purposes**

The Company clearly and accurately determines the legitimate and lawful purpose of processing personal data. The Company process the personal data in connection with its commercial activity and only to the extent it is required thereby. Personal data is collected in accordance with specifically stated legitimate and explicit purposes and processed accordingly (Article 5/1 (b) of European Union General Data Protection Regulation (EU GDPR)),

The purpose of the processing of personal data is justified before the start of personal data processing. However, archiving for the benefit of the public, or processing scientific or historical research or statistical purposes shall not be considered contrary to the above purposes.

#### **8.4. Being Relevant With, Limited to and Proportionate to the Purposes for Which They Are Processed**

The Company processes personal data in a way to achieve the identified purposes, and avoids the processing of personal data that is not required or not related to the realization of the purpose. For example, our company is not conducting personal data processing to meet the probable needs. Specific consent is requested for each data to be processed in accordance with European Union General Data Protection Regulation (EU GDPR).

#### **8.5. Being Retained for the Period of Time Stipulated by Relevant Legislation or the Purpose for Which They Are Processed.**

Company retains personal data for the period of time stipulated by relevant legislation or the purpose for which they are processed. In this context, our company, first of all, determines whether a period has been stipulated for the storage of personal data in the relevant legislation; if this is the case, it takes into account this period; otherwise it retains personal data for the time period required for the purpose for which they were processed. In the event that the said duration expires or the reasons for processing of personal data do not exist any more, then personal data is deleted, destroyed or anonymized by the Company. The Company does not store any personal data for any possible occasion of use in future.

#### **8.6. Processing Personal Data Based on and Restricted to One or More Conditions for Processing Personal Data as specified in Article 5 of the Law on Protection of Personal Data (LLPD)**

The protection of personal data is a constitutional right enshrined in Article 20, paragraph 3 of the Turkish Constitution. Fundamental rights and freedoms may be restricted only by law and in conformity with the reasons mentioned in the relevant articles of the Constitution without infringing upon their essence. Pursuant to the relevant article of the Constitution (Article 20/3), personal data may be processed in cases stipulated by law or with the express consent of the person.

The express consent of the data subject is only one of the legal basis that makes it possible to process personal data in accordance with the law. Apart from express consent, personal data may also be processed in the presence of any of the following conditions. The basis of the personal data processing activity may be only one of the following conditions, or more than one of these conditions.

Although the legal basis for the processing of personal data by the company varies according to the nature of the data, the processing of such data complies with the general principles of Article 4 of the Law on Protection of Personal Data (LLPD) and the principles of the second section of the European Union General Data Protection Regulation (EU GDPR).

##### **8.6.1. Failure to Obtain the Express Consent of the Data Subject**

Express consent, which is one of conditions for the processing of personal data, must be based on free will of data subject and specific disclosure statement for data subject and must be written in clear, understandable, simple language.

The express consents of the personal data subjects are obtained with the relevant methods in order to process the personal data in accordance with the express consent of the data subject.



In assessing whether the Consent is freely granted under European Union General Data Protection Regulation (EU GDPR), first of all, utmost attention is paid to ensure that the performance of a contract, including the provision of a service, is subject to a consent for the processing of personal data that is not required for the performance of that contract.

#### **8.6.2. The Cases Clearly Prescribed by the Law**

The personal data of the data subject may be processed in accordance with the law if clearly prescribed by the Law.

For example; obtaining fingerprints of suspects pursuant to Article 5 of Law No. 2559 on Police Duties and Authority (PVSK) for a criminal investigation by law enforcement.

#### **8.6.3. Failure to Obtain the Express Consent of the Data Subject Due to De Facto Impossibility**

If it is necessary for the protection of life or bodily integrity of a person himself/herself, or of someone else, who is unable to express his/her consent due to actual impossibility or whose consent is not legally recognized, then personal data may be processed.

For example; communicating identity information of an employee to hospital if an employee who has an occupational accident is unconscious.

#### **8.6.4. Direct Relation with Conclusion or Fulfillment A Contract**

If processing of personal data belonging to the parties of a contract is necessary provided that it is directly related to the conclusion or fulfillment of that contract, then personal data of the data subject may be processed.

For example; obtaining bank account information for the payment of wages to the employee under the service contract concluded between the employee and the Company.

#### **8.6.5. Company's Fulfillment of Its Legal Obligation**

The Company may process the personal data of the data subject if processing is required to fulfill its legal obligations as a data collector.

For example; submission of any information requested by the court / enforcement office to the court / enforcement office.

#### **8.6.6. Personal Data Made Public by the Data Subject**

If the data subject has made his/her personal data publicly known, then the relevant personal data may be processed.

For example; the employee provides his/her contact information on the internet pages that allow him/her to apply for a job.

#### **8.6.7. Processing of Data is Obligatory in Order to Establish, Exercise or Protect a Right**

Personal Data of the data subject may be processed if it is mandatory to process data for the establishment, exercise or protection of a right.

For example; storage of proof data (e.g. an invoice or employee's personal file) and use as needed.

#### **8.6.8. Mandatory Data Processing for Legitimate Interests (of the Company)**

If it is mandatory for the legitimate interests of the controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject, then personal data may be processed.

For example; Camera recordings for security purposes in company buildings and factories (workplaces).

### **9. COMPANY HEADQUARTERS PROCESSES PERSONAL DATA PROCESSED BY THE BRANCHES OF THE COMPANY**

In order to conduct the activities of the Branch in accordance with the principles, objectives and strategies of the Company and to protect the rights and interests and reputation of the Company, the personal data processed by the Branch can also be processed in the Company Headquarters. In the event that personal data sharing between the branch and the headquarters takes place within the scope of the personal data transfer from the data controller to the data controller pursuant to the Law on Protection of Personal Data (LLPD), the relevant Branch informs the person that the personal data of the person concerned can be communicated to the headquarters of the Company.

### **10. PROVIDING DISCLOSURE STATEMENT AND INFORMING THE PERSONAL DATA SUBJECT**

The Company provides disclosure statement for data subjects in accordance with Article 10 of the Law on Protection of Personal Data (LLPD) before the collection of personal data. In this context, Company provide information on identity of its representative, for what purpose personal data will be processed, to whom and for which purpose personal data can be transferred, personal data retrieving method and legal rights of the personal data subject.

Pursuant to Article 17/2 of European Union General Data Protection Regulation (EU GDPR); in cases where the controller has disclosed the personal data to the public and has to delete the personal data, the controller shall, considering the existing technology and application costs, take reasonable steps including technical measures to inform the controllers, who process the personal data requested by data subject, about deletion of any link related to personal data in question as well as any copies and reproductions by the said controllers.

Company provides a disclosure statement about the rights of the data subject in accordance with Article 10 of the Law on Protection of Personal Data (LLPD) and Article 5 of European Union General Data Protection Regulation (EU GDPR) and provides guidance on how to use these rights.

#### **10.1. Rights of Data Subject and Exercise of Such Rights**

##### **10.1.1. Rights of Data Subject**

Personal data subjects have the following rights:

1. To learn whether his personal data are processed or not,
2. To request information regarding personal data if it has been processed,

3. To learn the purpose of processing personal data and whether processed data is being used in accordance with its purpose,
4. The right to know the third parties to whom personal data are being transferred within the country or abroad,
5. Request correction of personal data in the case that it was processed incompletely or improperly, and request that the process carried out in this context to be notified to the third parties to whom the personal data had been transferred,
6. Request the deletion or destruction of personal data in the event that the reasons for its processing are no longer present, despite having been processed in accordance with the provisions of the Law on Protection of Personal Data (LLPD) and other related laws, and request that the process carried out in this context to be notified to the third parties to whom the personal data had been transferred,
7. Object to the occurrence of a result to the detriment of the person himself/herself, by means of analyzing the processed data exclusively through automated systems,
8. To request compensation for the damage arising from the unlawful processing of his personal data.

According to European Union General Data Protection Regulation (EU GDPR), the rights of personal data subjects are:

1. To be informed about the legal basis of the processing activity as well as the purposes of processing of personal data,
2. To acquire the identity and contact information of the controller and the representative of the controller, if applicable,
3. To be informed about the retention period of personal data or, if this is not possible, the criteria used to determine such period,
4. The right to revoke the consent at any time without affecting the legality of processing prior to revocation of such consent in cases where processing is based on subparagraph (a) of Article 6(1) or subparagraph (a) of Article 9(2) (European Union General Data Protection Regulation),
5. The right of data subjects to restrict the processing of personal data under the conditions specified in Article 16,
6. The right to transmit this data to another controller without any hindrance by the controller to whom the personal data is initially provided, and the right to transmit this data to another controller without any hindrance by the controller to whom the personal data is initially provided,
7. The right to not be subject to a decision based solely on automated processing, including profiling that has legal consequences for the data subject, or similarly affects the data subject to considerable extent,
8. The right to be informed pursuant to Article 14 in the cases where personal data is not obtained from data subject,
9. The right of the data subject to request the controller to correct the incorrect personal data about them without undue delay,
10. The right of the data subject to request the controller to correct (destruction/anonymization) the personal data about data subject without undue delay,
11. The right of the data subject to object to the processing of relevant personal data at any time,
12. The right to submit complaints to an audit authority,

#### **10.1.2. Situations in which the Data Subject may not Claim for Exercise of the Rights**

Personal data subjects, pursuant to Article 28 of the Law on Protection of Personal Data (LLPD), may not claim the foregoing rights listed under 10.1.1, as the followings are excluded from the scope of the Law:

1. Personal data is processed by natural persons within the scope of purely personal activities of the data subject or of family members living together with him in the same dwelling provided that it is not to be disclosed to third parties and the obligations about data security is to be complied with.
2. Personal data is processed for purposes such as research, planning and statistics through anonymization with official statistics.
3. Personal data is processed within the context of artistic, historical, literary or scientific purposes or freedom of speech provided that the personal data does not breach the natural defense, national security, public security, public order, economic security and confidentiality of private life or personal rights, and does not constitute a crime.
4. Personal data is processed within the scope of preventive, protective and intelligence operations executed by state institutions and organizations so authorized by the law to ensure national defense, national security, public safety, public order or economic security.
5. Personal data is processed by judicial or enforcement authorities in relation to the investigation, proceedings, litigation or execution procedures.

Pursuant to Article 28/2 of the Law on Protection of Personal Data (LLPD) and in the following cases, data subject cannot claim any right listed under 10.1.1 but the right to claim compensation for damage:

1. Processing of personal data is required for prevention of committing an illegal act or criminal investigation.
2. Personal data made public by the data subject is processed.
3. Processing of personal data is required for disciplinary investigation or prosecution and conducting supervisory or regulatory duties by the authorized state institutions and organizations and professional public organizations by the power granted by the law.
4. Processing of personal data is required for protecting economic and financial interest of the State with regard to the budgetary, tax related and financial issues.

### **10.1.3. Exercise of the Rights of the Personal Data Subject**

The data subjects submit their requests with respect to their rights set forth under 10.1.1 of this section to the Company with information and documents as proof of identity and by following means or by other means specified by Personal Data Protection Board after filling out the Application Form and submitting it to the Company free of charge:

- After filling in the form available at <https://www.coilpartners.com>, a wet signed copy of the form is to be submitted in person or through a notary public to the address of Mecidiye Mah. Selcuk Cad. No: 85 Sultanbeyli / İstanbul.
- It is requested by that the form available at <https://www.coilpartners.com> should be filled in and signed with "secure digital signature" within the scope of Electronic Signature Law No. 5070 and e-mailing the digitally signed form to [info@coilpartners.com](mailto:info@coilpartners.com) via a registered electronic mail, and there should be a power of attorney available for third party persons if it is intended that a third party would submit a petition for and on behalf of the data subject.

- The data subjects may exercise their rights by submitting this form to the data protection controller (Kamil Tekin), contact and address information provided hereinabove.

## **10.2. Company's Response to Applications**

Applications related to the personal data processing activities performed by the Branch must be directly made to the relevant Branch. It is only necessary to submit application to the headquarters of the Company in cases where the headquarters of the Company is deemed to be data controller under the Law on Protection of Personal Data (LLPD). This is possible in cases where the headquarters of the Company's collects personal data directly from the person concerned or the data exchange between the Branch and the headquarters of the Company is deemed to be data transfer from the data controller to the data controller under the Law on Protection of Personal Data (LLPD). In addition, applications related to personal data processing activities in which the relevant Branch is deemed to be the data controller should be made to the relevant Branch, not to the headquarters of the Company.

### **10.2.1. Our Company's Procedures and Response Time for Applications**

In the event that personal data subject duly communicates his/her request to our Company as per the procedure set forth under 10.1.3 of this section, we shall conclude the demands involved in the applications within thirty days at the very latest in accordance with European Union General Data Protection Regulation (EU GDPR) depending on the nature of the request and free of charge. However, in the case that a fee is set forth by the Personal Data Protection Board (PDPB), the fee to be charged to the Applicant by our Company will be at the rate determined by Personal Data Protection Board (PDPB).

### **10.2.2. Information to be Requested from Data Subject by Our Company**

Our company may request information from the concerned person to determine whether the applicant is the data subject. In order to clarify the issues in the application of data subject our Company may pose questions about the application.

### **10.2.3. The Company's Right to Reject the Application of the Data Subject**

Our Company may reject an application by explaining the reasons in the following cases:

1. Personal data is processed for purposes such as research, planning and statistics through anonymization with official statistics.
2. Personal data is processed within the context of artistic, historical, literary or scientific purposes or freedom of speech provided that the personal data does not breach the natural defense, national security, public security, public order, economic security and confidentiality of private life or personal rights, and does not constitute a crime.
3. Personal data is processed within the scope of preventive, protective and intelligence operations executed by state institutions and organizations so authorized by the law to ensure national defense, national security, public safety, public order or economic security.
4. Personal data is processed by judicial or enforcement authorities in relation to the investigation, proceedings, litigation or execution procedures.
5. Processing of personal data is required for prevention of committing an illegal act or criminal investigation.
6. Personal data made public by the data subject is processed.

7. Processing of personal data is required for disciplinary investigation or prosecution and conducting supervisory or regulatory duties by the authorized state institutions and organizations and professional public organizations by the power granted by the law.
8. Processing of personal data is required for protecting economic and financial interest of the State with regard to the budgetary, tax related and financial issues.
9. The request of the personal data holder is likely to hinder the rights and freedoms of others.
10. Requests necessitates disproportionate effort.
11. The requested information is publicly available.

### **10.3. Data Subject's Right to Submit a Complaint to the Personal Data Protection Board**

If the application is declined, the response is found unsatisfactory or the response is not given in due time, the data subject may file a complaint with the Board within thirty days as of he learns about the response of the controller, or within sixty days as of the application date, in any case, as stated under Article 14 of Law on Protection of Personal Data (LLPD) and European Union General Data Protection Regulation (EU GDPR).

## **11. TRANSFER OF PERSONAL DATA**

The Company is able to transfer data subject's the personal data and personal data of special nature to third parties by taking the necessary security measures for purposes in accordance with the law. Accordingly, Company complies with the regulations envisaged for the processing of data of special nature, pursuant to the provisions of Article 8 of the Law on Protection of Personal Data (LLPD).

Our company may transfer personal data, in line with legitimate and legal personal data processing purposes, to third parties on the basis of one or more of the personal data processing conditions specified in Article 5 of the Law on Protection of Personal Data (LLPD) as listed below:

- In the event that data subject express his/her explicit consent,
- In the event that there is a regulation in the law which expressly stipulates that personal data will be transferred,
- In the event that the transfer is mandatory for the protection of life or physical integrity of the person or of any other person who is bodily incapable of giving his/her consent or whose consent is not deemed legally valid;
- In the event that the transferring of personal data belonging to the parties of a contract, is necessary provided that it is directly related to the conclusion or fulfillment of that contract,
- In the event that personal data transfer be mandatory for our Company to fulfill its legal obligation,
- In the event that personal data is made available to the public by the data subject himself,
- In the event that personal data transfer is mandatory for the establishment, exercise or protection of any right.
- In the event that it is mandatory for the legitimate interests of our Company, provided that the transfer shall not violate the fundamental rights and freedoms of the data subject.

### **11.1. Transfer of Personal Data of Special Nature**

Our company may transfer personal data of special nature of the data subject to third parties in the following cases in line with legitimate and legal personal data processing purposes, by showing due diligence, taking required security measures and adequate measures stipulated by the Personal Data Protection Board (PDPB).

- In the event that personal data subject express his/her explicit consent, or
- the data subject does not provide express consent; - Personal data of special nature of the data subject other than the ones related to health and sexual life (race, ethnicity, political tendency, philosophical belief, religion, sect or other beliefs, dress and clothing, associations, foundations or trade union membership, criminal convictions and data related to security measures , and biometric and genetic data) can be processed where required by law, - whereas personal data of special nature of the personal data related to health and sexual life can only processed by persons with confidentiality commitment or authorized institutions and organizations for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, health services and financial planning and management thereof,

Pursuant to European Union General Data Protection Regulation (EU GDPR);

The personal data of special nature of the data subject can be processed without express consent of the data subject if data subject is not in a position to provide a physical or legal consent, or if processing is required for protection of vital interest of a natural person or data subject, or if processing is related to personal data which are expressly made public by data subject, or if processing is required for the benefit of public in the field of public health such as providing protection against cross-border threats against health or ensuring high quality and security standards for health services and medical products or medical devices, or if processing is required for the benefit of public in line with the archiving purposes, scientific or historical research purpose or statistical purposes.

### **11.2. Third Parties to whom Personal Data are Transmitted by the Company and the Purposes of Transfer**

In accordance with Articles 8 and 9 of the Law on Protection of Personal Data (LLPD), the Company may transfer the personal data of the policy holders to the following categories of persons:

- To business partners of the Company,
- To Company's suppliers,
- To Company's branches,
- To Company's shareholders,
- To Company officials.

### **11.3. Transferring Personal Data Abroad**

The Company is able to transfer data subject's the personal data and personal data of special nature to third parties by taking the necessary security measures for purposes in accordance with the law. Company can transfer personal data to the foreign countries which are declared to provide adequate protection by Personal Data Protection Board (PDPB) ("Foreign Country with Adequate Protection") or the foreign countries for which data controller in Turkey or in relevant country provide a commitment for adequate protection and an authorization is provided by Personal Data Protection Board (PDPB) ("Foreign Countries with Data Controller Committed to Adequate Protection") in cases

where adequate protection is not made available by foreign country in question. Accordingly, Company complies with the regulations envisaged for the processing of data of special nature, pursuant to the provisions of Article 9 of the Law on Protection of Personal Data (LLPD).

Processing personal data only in accordance with documented instructions issued by the controller, including those relating to the transfer of personal data to a third country or international organization, unless there is a requirement to do so under Union or Member State law to which the processor is subject pursuant to European Union General Data Protection Regulation (EU GDPR); in this case, the data controller shall inform the data subjects of this legal requirement before processing unless such a disclosure statement is not prohibited by law due to grounds for important public interest.

#### **11.4. Transferring Personal Data Abroad**

The Company may transfer personal data to Foreign Countries with Adequate Protection or with Data Controller Committed to Adequate Protection in cases where data subject provides express consent for legitimate and lawful personal data processing purposes or in the presence of one of the following situations if data subject does not provide express consent thereof:

- In the event that there is a regulation in the law which expressly stipulates that personal data will be transferred,
- In the event that the transfer is mandatory for the protection of life or physical integrity of the person or of any other person who is bodily incapable of giving his/her consent or whose consent is not deemed legally valid;
- In the event that the transferring of personal data belonging to the parties of a contract, is necessary provided that it is directly related to the conclusion or fulfillment of that contract,
- In the event that personal data transfer be mandatory for our Company to fulfill its legal obligation,
- In the event that personal data is made available to the public by the data subject himself,
- In the event that personal data transfer is mandatory for the establishment, exercise or protection of any right.
- In the event that it is mandatory for the legitimate interests of our Company, provided that the transfer shall not violate the fundamental rights and freedoms of the data subject.

Pursuant to European Union General Data Protection Regulation (EU GDPR);

The transfer of personal data processed or intended to be processed following its transfer to a third country or international organization, including transit transfers from a third country or an international organization to another third country or other international organization but being subject to other provisions of this Legislation is done if data controller of processor comply with the requirements set forth under this Section. It is intended to ensure that the level of protection for natural persons provided by this Regulation is not impaired.

#### **11.5. Transfer of Personal Data of Special Nature Abroad**

Our company may transfer personal data of special nature of the data subject to foreign countries which has sufficient level of protection or has a data controller who is committed to provide sufficient level of protection in the following cases in line with legitimate and legal personal data



processing purposes, by showing due diligence, taking required security measures and adequate measures stipulated by the Personal Data Protection Board (PDPB).

- In the event that personal data subject express his/her explicit consent, or
- In the scope; The data subject does not provide express consent; - Personal data of special nature of the data subject other than the ones related to health and sexual life (race, ethnicity, political tendency, philosophical belief, religion, sect or other beliefs, dress and clothing, associations, foundations or trade union membership, criminal convictions and data related to security measures , and biometric and genetic data) can be processed where required by law, - whereas personal data of special nature of the personal data related to health and sexual life can only processed by persons with confidentiality commitment or authorized institutions and organizations for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, health services and financial planning and management thereof,

## **12. COLLECTION AND PROCESSING OF PERSONAL DATA OF CHILDREN**

Personal data of persons under the age of 18 (children) is not processed without the consent of their parents. The personal data of the children are lawful if their parents express their consent.

If we unintentionally process the children's data without the consent of their parents, please get in contact with us and we will remove the data we process online if you notify us of the situation.

If processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child, then processing of personal data without express consent of parents is possible.

According to European Union General Data Protection Regulation (EU GDPR) and with respect to the provision of information society services directly to a child, the processing of personal data of the child concerned is lawful if the child is at least 16 years old. If the child is less than 16 years old, such processing shall be lawful only if the consent is granted or approved by the person entitled to custody of the child and to the extent that it is granted or approved.

In such a case, the controller is obliged to make reasonable efforts to verify that consent is granted or approved by the person entitled to custody of the child, making best use of the available technology.

## **13. CATEGORIZATION OF PERSONAL DATA PROCESSED BY OUR COMPANY**

Our company may transfer personal data, in line with legitimate and legal personal data processing purposes, to third parties on the basis of and restricted by one or more of the personal data processing conditions specified particularly in Article 5 of the Law on Protection of Personal Data (LLPD) and general principles under Article 4 of the Law on Protection of Personal Data (LLPD) and informing the relevant persons of such processing pursuant to Article 10 of the Law on Protection of Personal Data (LLPD).

CATEGORIZATION OF PERSONAL DATA	DESCRIPTION	DATA SUBJECT
Identification Details	<p>These are the data which include information about the identity of data subject; which are processed partially or completely automatically or non-automatically as part of the data recording system; in which it is clear that the identity belongs to a specific or identifiable natural person; documents such as ; driver's license, identity card, attorney's identity card, marriage certificate, residential address certificate and passport which include information such as name-surname, T.R. identification number, nationality information, mother name-father name, place of birth, date of birth, gender, as well as information such as tax number, SSI number, signature information, vehicle license plate and so on.</p>	<p>Customer, Potential Customer, Employees, Company Shareholder, Company Officials, Visitors as well as Employees, Shareholders and Officials of the Companies we cooperate with, and Third Party.</p>
Contact Information	<p>These are the data which are processed partially or completely, automatically or non-automatically as part of the data recording system; in which it is clear that the identity belongs to a specific or identifiable natural person; information such as phone number, address, e-mail address, fax number, IP address an so on.</p>	<p>Customer, Potential Customer, Employees, Company Shareholder, Company Officials, Visitors as well as Employees, Shareholders and Officials of the Companies we cooperate with, and Third Party.</p>
Location Data	<p>These are the data which are processed partially or completely, automatically or non-automatically as part of the data recording system; in which it is clear that the identity belongs to a specific or identifiable natural person; which provides information about the location information of data subject during the use of products and services of the Branch within the framework of the operations performed by business units of the Company or location information about the employees of the Companies we cooperate with during their use of Company vehicles: GPS location, route details and so on.</p>	<p>Customer, Employee, Employees of Companies we cooperate with.</p>
Family members and information about relatives.	<p>These are the data which are processed partially or completely, automatically or non-automatically as part of the data recording system; in which it is clear that the identity belongs to a specific or identifiable natural person; which provides information about family members (i.e., spouse, mother, father, children), relatives and emergency contact persons with respect to product and services offered by the Branch within the framework of the operations performed by business units of the Company or with respect to</p>	<p>Customer, Visitor, Employee, Company Shareholder, Company Official, Third Party as well as Employees, Shareholders and Officials of cooperated Companies.</p>

	protection of legal and other interests of the Company and data subject.	
Physical Location Safety Information	These are the data which are processed partially or completely, automatically or non-automatically as part of the data recording system; in which it is clear that the identity belongs to a specific or identifiable natural person; which provide information related records and documents created during entrance to a physical environment, and during stay in such an environment information: camera records, fingerprint records and other records made in security point and so on.	Customer, Potential Customer, Employees, Company Shareholder, Company Officials, Visitors as well as Employees, Shareholders and Officials of the Companies we cooperate with, and Third Party.
Audio / Visual Information	These are the data in which it is clear that the identity belongs to a specific or identifiable natural person; which are available in photographs and camera recordings (except for records entered in the scope of Physical Space Security Information), audio recordings and data contained in documents which are copies of documents containing personal data.	Customer, Potential Customer, Employees, Company Shareholder, Company Officials, Visitors as well as Employees, Shareholders and Officials of the Companies we cooperate with, and Third Party.
Transaction Security Information	These are the data in which it is clear that the identity belongs to a specific or identifiable natural person and contained within the data recording system; personal data processed to ensure technical, administrative, legal and commercial security when performing activities.	Customer, Visitor, Third Party, as well as Employees, Shareholders and Officials of cooperated Companies.
Risk Management Data	These are the data in which it is clear that the identity belongs to a specific or identifiable natural person and contained within the data recording system; personal data processed by means of methods in compliance with legal and commercial practices and good faith rules which are commonly recognized for management of commercial, technical and administrative risks.	Customer, Potential Customer, Employees, Company Shareholder, Company Officials, Visitors as well as Employees, Shareholders and Officials of the Companies we cooperate with, and Third Party.
Financial Information	These are the data which are processed partially or completely, automatically or non-automatically as part of the data recording system; in which it is clear that the identity belongs to a specific or identifiable natural person; information which are created based on the established relation between the Company and data subject, processed related to any data, document or records indicating any financial results, and information such as bank	Customer, Employees, Company Shareholder, Company Officials as well as Employees, Shareholders and Officials of the Companies we cooperate with.

	account number, IBAN number, credit card details, financial profile, wealth statement, income statement and so on.	
Personnel Information	These are the data which are processed partially or completely, automatically or non-automatically as part of the data recording system; in which it is clear that the identity belongs to a specific or identifiable natural person; any personal data processed for acquisition of information which would constitute the basis for personnel rights of natural persons under employment relation with the Company's (training, certificates, SSI records, criminal record, health record, information related to workplace of former employment etc.).	Employees as well as Employees, Shareholders and Officials of Companies with Shareholders and Officials of which we cooperate.
Employee Information	These are the data which are processed partially or completely, automatically or non-automatically as part of the data recording system; in which it is clear that the identity belongs to a specific or identifiable natural person; personal data processed with respect to persons who applied for a position in our company or has employment relation with our Company as per requirements of human resources pursuant to commercial practices and good faith principles.	Employees, Employees of cooperated Companies.
Employee Transaction Information	These are the data which are processed partially or completely, automatically or non-automatically as part of the data recording system; in which it is clear that the identity belongs to a specific or identifiable natural person; personal data processed with respect to any business-related action or procedure performed by employees or by natural persons we cooperate with.	Employees, Employees of cooperated Companies.
Data on Employee Performance and Career Development	These are the data which are processed partially or completely, automatically or non-automatically as part of the data recording system; in which it is clear that the identity belongs to a specific or identifiable natural person; personal data processed with the aim of evaluation of employee performances or performances of natural person in business relation with our Company, and with the aim of planning and realization of their career development within the scope of human resources policy of our Company.	Employees, Employees of cooperated Companies.
Information on Fringe Benefits and Allowances	These are the data which are processed partially or completely, automatically or non-automatically as part of the data recording system; in which it is clear that the identity belongs to a specific or identifiable natural person; personal data processed for planning of fringe benefits and allowances provided or to be provided to employees or other natural persons in business relation with our Company, and for determination and follow-up objective criteria for entitlement	Employees, Employees of cooperated Companies.

	therefor.	
Data on Legal Procedures and Compliance	These are the data which are processed partially or completely, automatically or non-automatically as part of the data recording system; in which it is clear that the identity belongs to a specific or identifiable natural person; personal data processed with respect to determination and follow-up of legal receivables and rights, legal obligations related to performance of debts and within the scope of compliance with Company policies.	Customer, Potential Customer, Employees, Company Shareholder, Company Officials, Visitors as well as Employees, Shareholders and Officials of the Companies we cooperate with, and Third Party.
Information on Audit, Inspection and Ethics	These are the data which are processed partially or completely, automatically or non-automatically as part of the data recording system; in which it is clear that the identity belongs to a specific or identifiable natural person; personal data processed within the scope of legal debts and compliance with Company policies.	Customer, Potential Customer, Employees, Company Shareholder, Company Officials, Visitors as well as Employees, Shareholders and Officials of the Companies we cooperate with, and Third Party.
Personal Data of Special Nature	These are the data which are processed partially or completely, automatically or non-automatically as part of the data recording system; in which it is clear that the identity belongs to a specific or identifiable natural person; which are specified under Article 6 of the Law on Protection of Personal Data (LLPD) (i.e. health information including blood type, biometric data, religion and membership of associations and so on)	Customer, Potential Customer, Employees, Company Shareholder, Company Officials, Visitors as well as Employees, Shareholders and Officials of the Companies we cooperate with, and Third Party.
Information on Request/Complaint Management	These are the data which are processed partially or completely, automatically or non-automatically as part of the data recording system; in which it is clear that the identity belongs to a specific or identifiable natural person; personal data processed for acceptance of any request or complaint.	Customer, Potential Customer, Employees, Company Shareholder, Company Officials, Visitors as well as Employees, Shareholders and Officials of the Companies we cooperate with, and Third Party.

#### 14. PURPOSES OF PERSONAL DATA PROCESSING

The Company processes personal data restricted to the purposes and conditions of the personal data processing set out in Article 5, paragraph 2, and Article 6, paragraph 3 of the Law on Protection of Personal Data (LLPD). Personal data is maintained in such a way that data subjects are identified only as long as the purposes for processing of personal data are valid and existing (Article 5 of European Union General Data Protection Regulation (EU GDPR)). These objectives and conditions are as follows;

- In the event that the relevant activities of our Company regarding the processing of your personal data should be clearly prescribed by laws,
- The processing of your personal data by our Company should be directly relevant and necessary for the conclusion or fulfillment of a contract.
- In the event that the processing of your personal data should be mandatory for our Company to be able to meet our legal obligations,
- In the event that the data is processed to the extent it is made public, provided that your personal data is made available to the public by you,
- In the event that, the processing of your personal data by our Company should be mandatory to establish, exercise or protect the rights of our Company or you or third parties.
- In the event that, personal data processing should be mandatory for the legitimate interests of our Company, provided that this processing shall not violate your fundamental rights and freedoms,
- In the event that personal data processing by our company should be mandatory for the protection of life or physical integrity of the personal data subject or of any other person, and in this case personal data subject should be bodily incapable of giving his consent or whose consent is not deemed legally valid,
- In the event that the processing of personal data of special nature, excluding those relating to health and sexual life, is prescribed by laws,
- In the event that personal data subject's health or sexual life are processed by the persons or authorized organizations obliged to protect privacy for the purpose of protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

In this context, the Company processes your personal data for the following purposes:

- Planning and executing corporate communication activities,
- Event management,
- Management of relations with business partners or suppliers,
- Performing personnel recruitment processes,
- Supporting personnel recruitment processes of branches,
- Execution / follow-up of the Company's financial reporting and risk management procedures,
- Execution / follow-up of Company legal affairs,
- Planning and execution of corporate communication activities,
- Execution of corporate governance activities,
- Conclusion of company and partnership law procedures,
- Request and complaint management,
- Ensuring the security of branch values,
- Supporting the branches for compliance with the legislation,
- Supporting the planning and execution processes of fringe benefits and allowances to be provided to the senior executives of the headquarters and branch,
- Planning and execution of audit activities in order to ensure that the activities of the branches are performed in accordance with the Company's procedures and relevant legislation,
- Supporting the branches for the conclusion of company and partnership law procedures,
- Managing investor relations,

- Providing information to the competent authorities from the legislation,
- Creating and tracking visitor records,

In the event that the data processing activity performed for the aforementioned purposes does not meet any of the conditions stipulated under the Law on Protection of Personal Data (LLPD) and European Union General Data Protection Regulation (EU GDPR), Company acquires express consent of you in relation to the relevant processing under this policy.

#### 14.1. CATEGORY OF DATA OBJECTS OF PERSONAL DATA PROCESSED BY THE COMPANY

Visitor	Real persons who have entered the physical premises of the Company for various purposes or who have visited our websites.
Third Party	Company Employees and other natural persons who are not included in the scope of this Policy and the Policy on Protection and Processing of Personal Data (e.g. guarantor, companion, family members and relatives, former employees).
Employees,	Natural person working in the company,
Company's shareholders,	Natural person Company shareholders,
Company Officials,	Members of the Board of Directors and other authorized natural persons of the Company,
Employees, Shareholders and Officials of Companies we cooperate with,	Real persons, including the employees, shareholders and officials of Companies with which our Company has any business relations (including but not limited to business partners, suppliers).

#### 15. RETENTION PERIOD OF PERSONAL DATA

Our Company stores personal data, where stipulated in the relevant laws and regulations, for the period stated in these legislations.

Personal data may be retained and stored for longer periods of time, being subject to the implementation of appropriate technical and regulatory measures required under European Union General Data Protection Regulation (EU GDPR).

In cases where the legislation does not regulate the period of retention for how long personal data should be stored, personal data is processed for a period, which requires the processing of our data in accordance with the requirements of our Company's practices and precedents of commercial activities, depending on the services offered by our Company, and they shall be then deleted, destroyed or anonymized.

Pursuant to the decision of the Personal Data Protection Board ("PDPB"); *"Upon the fact that data controller refuses to fulfill the request for deletion of personal data of currently inactive customer (concerned person); it is hereby decided that data collector should be instructed not to process the*

*personal data of active customers for any purpose other than retention purpose in accordance with Article 4 of the Law since data controller is required to retain personal data for 10 years pursuant to the legislation to which data controller is subject."*

If the purpose of processing the personal data expires, and the relevant legislation and the foregoing decision of the Law on Protection of Personal Data (LLPD) become obsolete, and the retention periods determined by the Company also comes to close, personal data can only be stored for the purposes of potential legal disputes, or claims on related rights linked to personal data, or preparations of statement of defense. In setting the time spans, retention periods are determined based on prescription periods for claiming the mentioned right, and even though the prescription periods expires, the examples of requests previously directed to our company on the same issues. In this case, retained personal data are not accessible for any other reason except for the requirements of legal disputes. Personal data is deleted, destroyed or anonymized once the mentioned period has expired.

In accordance with European Union General Data Protection Regulation (EU GDPR); our Company takes all reasonable steps to ensure that any incorrect data is deleted or corrected without delay.

## **16. THE RIGHT TO BE FORGOTTEN (THE RIGHT TO ERASURE)**

The data subject has the right to request that the personal data relating to him / her is deleted without any delay and the controller is obliged to delete the personal data without delay, *if any of the following cases occur.*

- In the event that the personal data are no longer required for purposes of collection or processing,
- The data subject revokes the authorization on which the processing activity is based and there is no other legal justification for the processing activity,
- In the event that the data subject objects to the processing activity and there is no legitimate justification for the processing activity,
- In the event that personal data is processed in an illegal manner,
- In the event that deletion of personal data is obligatory in order to ensure compliance with a legal obligation under the law of the Union or member state to which the controller is subjected.
- In the event that personal data is collected for provision of information society services.

## **17. CONDITIONS FOR DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA**

Despite the fact that it has been processed in accordance with the relevant legal provisions as set out in Article 138 of Turkish Penal Code and in Article 7 of the Law on Protection of Personal Data (LLPD), personal data is deleted, destroyed or made anonymous upon the Company's own decision or at the request of the data subject, in case the reasons that require processing do not exist any more.

### **17.1. Techniques for Deletion, Destruction and Anonymization of Personal Data**

#### **17.1.1. Techniques for Deletion and Destruction of Personal Data**

Although our Company has processed personal data in accordance with the provisions of the relevant law, should the reasons for the processing not exist any more, our Company may erase or destroy the data at its own discretion or at the request of the personal data subject. The most common deletion or destruction techniques used by our company are as follows:



1. **Physical Destruction:** All personal data are also processed by non-automated means provided that they are part of any data recording system. For deletion and destruction of personal data, a system which does not allow recovery of personal data is used.
2. **Secure Deletion with Software:** The methods in regard to erasing the data from the relevant software in a manner that shall not be recovered again while erasing/destroying the data stored in digital environments and processed with fully or partially automated means is used.
3. **Secure Deletion by Expert:** In some cases, the company can engage an expert to erase personal data on its behalf. In such a case, the personal data is securely erased / destroyed by skilled person in a way that they cannot be recovered again.

### 17.1.2. Techniques for Anonymization of Personal data

Anonymization of personal data refers to making personal data unlikely to be associated with any identifiable real person in any way even when personal data is paired with other data. Our company may anonymize personal data when the reasons for processing the personal data processed in accordance with the law are disappeared. In accordance with Article 28 of the Law on Protection of Personal Data (LLPD); anonymized personal data can be processed for research, planning and statistics purposes. Such a processing of personal data is excluded from the scope of the Law on Protection of Personal Data (LLPD), and there is no need for express consent of data subject. The most common anonymization techniques used by our company are as follows:

1. **Masking:** This is the method in which key determinant information of personal data is extracted from data set with data masking and personal data is anonymized. Example: Creation of a data set in which data subject is rendered impossible to identify, by removal of identifying information such as name, T.R. ID No. etc.
2. **Aggregation:** Through data aggregation method, several data is aggregated and personal data is made in a manner that is not associated with any person. Example: To provide statistics that there are Z employees at age X without providing information about the age of the employees one by one.
3. **Data Derivation** Through data derivation, more general content is created from the content of the personal data and it is ensured that personal data is made in a manner that is not associated with any person.  
Example: Specifying ages instead of birth dates; specifying the place of residence instead of the full address.
4. **Hashing of Data:** Through data hashing, link between values and persons are broken down by mixing values in a personal data set. Example: Rendering data subject unassociatable with voice records, changing the characteristics of such records.

## 18. COOKIE POLICY

When the company's website is visited, cookies are used to collect information about the use of the site. A cookie is a small file containing a number of characters that is sent to your computer when you visit a website and is unable to collect any information, including personal data stored on your computer or files.

## **19. REVOCATION OF GRANTED CONSENT**

In cases where the personal data of the data subject is processed based on the express consent of data subject by the Company, the data subject may revoke his/her consent. However, the revocation of consent does not prejudice the legality of data processing prior to such revocation.

According to European Union General Data Protection Regulation (EU GDPR); the data subject has the right to revoke his/her consent at any time. Revocation of consent does not affect the legality of processing based on consent of the data subject prior to such revocation. The data subject is informed thereof before granting consent. Revocation of consent is as easy as granting it.