

**PERSONAL DATA PROTECTION POLICY OF
EROĞLU GLOBAL HOLDING ANONİM ŞİRKETİ
(EROĞLU GLOBAL HOLDING)**

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PERSONAL DATA PROTECTION POLICY OF EROĞLU GLOBAL HOLDİNG ANONİM ŞİRKETİ (EROĞLU GLOBAL HOLDING)

1. Purpose of Preparing the Personal Data Protection Policy

Eroğlu Global Holding Anonim Şirketi (Eroğlu Global Holding) aims to duly fulfill the requirements for the compliance with the relevant legislation in the capacity of data controller as defined under the PDPL and to establish a data protection and processing policy at the international standards with the awareness of the importance of the confidentiality and security of the personal data obtained under the Personal Data Protection Law No 6698 (PDPL) and the other relevant legislation.

With this Policy, the principles of lawfulness, fairness, and transparency adopted by Eroğlu Global Holding in the protection and processing of personal data are set forth. Within the scope of the Policy, information is provided regarding the purposes for which personal data are processed, the methods of collecting personal data, their legal grounds and purposes, the parties to whom the data may be transferred and for what purposes, and the rights of data subjects and the application procedures. This Policy has been prepared based on the Personal Data Inventory prepared for Eroğlu Global Holding. Eroğlu Global Holding, in its capacity as a data controller under the Personal Data Protection Law, is responsible only for the personal data it collects and processes within the scope of its own fields of activity.

2. Definitions of the Terms used in the Policy

Anonymization	: Making the personal data non-relatable with an identified or identifiable natural person in any way even by matching it with other data
Clarification Text	: Clarification made to the data subject in relation to the issues such as for which purpose and how long the personal data will be retained, by which method the personal data is collected, how the personal data is kept and whether the personal data will be shared with third parties
Presidency	: Presidency of the Personal Data Protection Authority
Inventory	: An inventory which the data controllers establish by correlating their personal data processing activities with the purposes of processing the personal data, the data categories, the group of receivers to whom the personal data is transferred and the group of data subjects and in which the data controllers detail their personal data processing activities by clarifying the maximum period of time necessary for the purposes for which the personal data is processed, the personal data which is required to be transferred to foreign countries and the measures taken for the data security
Data Subject	: Any natural person whose personal data is processed
Disposal	: Deleting, destroying or anonymizing the personal data
Law/PDPL	: Personal Data Protection Law
Personal Data	: Any and all information concerning an identified or identifiable natural person. For example; name-surname, T.R. ID No, e-mail, address, date of birth, bank account number etc. Accordingly, the PDPL does not cover the processing of the data regarding legal entities.

Processing of the Personal Data	:	Any and all processes carried out on data such as obtaining, recording, storing, retaining, changing, rearranging, disclosing, transferring, taking over, making available, categorizing or preventing the use of the personal data, partially or wholly, by automatic means or non-automatic means, provided that they are a part of any data recording system
Board	:	Personal Data Protection Board
Authority	:	Personal Data Protection Authority
Sensitive Data	:	Data related to the race, ethnic origin, political opinion, philosophical belief, religion, sect, or other beliefs, appearance, membership to associations, foundations or unions, health, sexual life, criminal conviction and security measures as well as biometric and genetic data
VERBIS	:	Information system which will be used by the data controllers in applying to the Register and in other relevant processes regarding the Register, which is accessible via the Internet and which was established and is managed by the Presidency
Data Processor	:	Any natural person or legal entity processing the personal data on behalf of the data controller on the basis of the authorization granted by data controller
Data Controller	:	Any natural person or legal entity determining the purposes and means of processing the personal data and responsible for establishing and managing the data recording system
Register of Data Controllers	:	Register of Data Controllers maintained by the Presidency
Contact Person of the Data Controller	:	Any natural person notified by the data controller during the registration to the Register for the communication with the Authority in relation to the obligations of the representative of the legal entity data controllers located in Türkiye and the legal entity data controllers not located in Türkiye under the Law and the secondary regulations to be enacted based on this Law
Deletion	:	Process of deleting the personal data and making the personal data unaccessible and nonreusable for the relevant users in any manner
Destruction	:	Process of destroying the personal data and making the personal data unaccessible, unretrievable and nonreusable by any person in any manner

3. Fundamental Principles for the Processing of the Personal Data

“Eroğlu Global Holding” fulfills the general principles and requirements set forth in the legislation in relation to the protection and processing of the personal data and acts in compliance with the principles listed below in order to ensure that the personal data is processed in accordance with the Constitution and the PDPL.

3.1. That the Processing of the Personal Data is prohibited as a rule

“Eroğlu Global Holding” processes the personal data based on the following reasons only within the limits stipulated by the legislation with the awareness of the fact that the processing of the personal data is prohibited as a rule:

a. That the explicit consent of the personal data subject is obtained

One of the requirements for processing the personal data is the explicit consent of the data subject. The explicit consent of the personal data subject must be declared with regard to a specific issue, based on notification and with free will. The data is processed within the scope of the explicit consent of the data

subject and for the purposes set forth in the explicit consent. As a rule, in the case of the following conditions, it is not required to obtain the explicit consent of the data subject separately.

b. That the processing of the personal data is expressly stipulated by the laws

If it is expressly stipulated by the laws, the personal data of the data subject is processed in accordance with the laws. In the cases where the processing of the personal data is permitted by the laws, the data is processed as limited to the reasons and data categories set forth in the relevant law.

c. That it is impossible to obtain the explicit consent of the data subject due to actual impossibility

If the processing of the personal data is mandatory in order to protect the life or bodily integrity of the data subject himself/herself, who is incapable of declaring his/her consent due to actual impossibility or whose consent cannot be legally validated, or another person, the personal data of the data subject can be processed.

d. That the processing of the personal data is directly related to the establishment or performance of a contract

If the processing of the personal data of the parties to a contract is necessary, the personal data can be processed, provided that it is directly related to the establishment or performance of such contract (on condition that the person whose data will be processed based on the establishment or performance of the contract is one of the parties to the contract).

e. That the processing of the personal data is mandatory for the fulfillment of the legal obligations

In the cases where the processing of the personal data is mandatory for the fulfillment of the legal obligations, the personal data of the data subject can be processed.

f. That the personal data subject makes his/her personal data public

If the personal data of the data subject has been made public by the data subject himself/herself, the relevant personal data can be processed as limited to the purpose of making public.

g. That the processing of the personal data is mandatory for the establishment or protection of any right

If the processing of the personal data is mandatory for the establishment or protection of any right, the personal data of the data subject can be processed.

h. That the processing of the personal data is mandatory due to the legitimate interests

If the processing of the personal data is mandatory for the legitimate interests of the Data Processing Company, the personal data of the data subject can be processed, provided that it will not impair the fundamental rights and freedoms of the personal data subject.

The data related to the race, ethnic origin, political opinion, philosophical belief, religion, sect, or other beliefs, appearance, membership to associations, foundations or unions, health, sexual life, criminal conviction and security measures as well as biometric and genetic data of the data subjects is the sensitive personal data. If the processed data is sensitive personal data as defined under the PDPL and the data subject does not give his/her explicit consent, the personal data may be processed in the following cases only provided that the sufficient measures to be determined by the Board are taken:

a) That the explicit consent of the data subject is obtained,

b) That the processing of the personal data is expressly stipulated by the laws,

c) That the processing of the personal data is mandatory in order to protect the life or bodily integrity of the data subject himself/herself, who is incapable of declaring his/her consent due to actual impossibility or whose consent cannot be legally validated, or another person,

ç) That the processing of the personal data is related to the personal data which has been made public by the data subject and suitable for the will of making public,

d) That the processing of the personal data is mandatory for the establishment, exercise or protection of any right,

- e) That the processing of the personal data is necessary for the protection of the public health, the execution of the preventive medicine, medical diagnosis, treatment and care services and the planning, management and funding of the health services by the persons or authorized institutions and organizations who/which have the confidentiality obligation,
- f) That the processing of the personal data is mandatory for the fulfillment of the legal obligations in the fields of employment, occupational health and safety, social security, social services and social aids,
- g) That the processing of the personal data is intended for the current or former members of the foundations, associations and other non-profit organizations or establishments, which have been established for political, philosophical, religious or union-related purposes, or any persons who are regularly in contact with these organizations and establishments, provided that the processing of the personal data will comply with the legislation to which they are subject and their purposes and will be limited to their areas of activity and the personal data will not be disclosed to third parties,

3.2. Compliance with the Law and the Rule of Honesty

“Eroğlu Global Holding” processes the personal data in compliance with the law and the rule of honesty and aims to compensate the conflicting interests by observing “the fair interests” pursuant to the Article 4 of the PDPL. The notification is based on clarity and honesty and provides clear information about the intended use of the collected personal data and the data is processed within this framework.

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

“Eroğlu Global Holding” determines for which purposes it will process the data of the data subject in line with the explicit consent of the data subject. In this regard, it abstains from processing the personal data which is not proportionately relevant to the purpose of processing or which is not required, and the data necessary during the data processing activities is collected at minimum level.

3.4. Ensuring the Accuracy and Up-to-dateness, when required, of the Personal Data

“Eroğlu Global Holding” ensures that the processed personal data is accurate, relies on the statements of the data subject in terms of the accuracy of the personal data and receives confirmation regarding the up-to-dateness of the personal data when required.

3.5. Processing the Personal Data for Definite, Explicit and Legitimate Purposes

“Eroğlu Global Holding” collects and processes the personal data for the legitimate and lawful reasons. “Eroğlu Global Holding” processes the personal data in connection with the activities which it carries out, within a reasonable framework and to the extent necessary and keeps the personal data for the period of time stipulated in the relevant legislation or necessary for the purpose for which it is processed.

“Eroğlu Global Holding” is aware of the fact that the security of your data is not only limited to the legal methods, but it is also important to take the technology aided means as basis with the awareness of the rate of development of the technology. In this regard, it makes effort to take all measures necessary for ensuring the security of the data.

4. Method of Collecting the Personal Data

The personal data can be collected verbally, in written or electronically by the automatic or non-automatic methods and similar means. Your personal data collected can be processed and transferred within the scope of the requirements for and purposes of processing the personal data as set forth in the Articles 5 and 6 of the PDPL in order to serve you better.

The personal data is collected by “Eroğlu Global Holding” manually and automatically through the following channels:

- Through the cookies if the website is used,
- Through the closed circuit camera systems, access control systems and license plate recognition systems,
- If the Employees and Employee Candidates contact with the data controller by sharing their

personal data verbally or physically, or via e-mail, personal rights and evaluations within the company, systemic common areas and applications within the company, computer and phone records, CCTV/ Camera Records, resumes and requests, employment and consultancy companies, accounts operated on behalf of the Data Controller through the social media channels, websites, short messages sent and information forms,

- If shared by the Shareholders physically or via the verbal statements, printed document transfer, correspondences exchanged between the Shareholders and the Company via their electronic mail addresses, short messages sent and information forms,
- If shared by the Customers verbally or physically, or via e-mail, CCTV/ Camera Records, cookies at the website, short messages sent and requests,
- Through the accounts operated on behalf of the Company through various social media channels, the correspondences made through the social media channels, and short messages sent,
- If shared by the Business Partners via the negotiations, meetings and visits made, held and conducted for the establishment, execution and performance of a contract with our Company and via the verbal statements, printed document transfer, e-mail, phone records and SMS following the execution of the contract.

The personal data can be collected verbally, in written or electronically by the automatic or non-automatic methods and similar means. Your personal data collected can be processed and transferred within the scope of the requirements for and purposes of processing the personal data as set forth in the Articles 5 and 6 of the PDPL in order to serve you better.

5. Types, Collection and Purposes of Processing of the Personal Data

5.1. Personal Data of the Employee Candidates

Personal Data	Legal Reason	Purpose of Processing
<u>Identity Information</u> Name-Surname, Photograph, Nationality, Marital Status, Place of Birth, Date of Birth, Gender	The processing of the personal data is mandatory for the legitimate interests of the data controller, provided that it does not impair the fundamental rights and freedoms of the data subject.	Execution of the Employee Candidate / Intern / Student Selection and Placement Processes
<u>Association Membership</u> Information about Memberships to Associations		Execution of the Application Processes of Employee Candidates
<u>Physical Space Security</u> Camera Records, Photographs		Provision of the Physical Space Security
<u>Contact Details</u> E-Mail, Phone Number, Mobile Phone Number, Address		Follow-up and Execution of the Legal Affairs
<u>Personal Information</u> Organization where they work, Family Status Notification, Personal Background Details		Execution / Inspection of the Business Operations
<u>Information about Professional Experience</u>		Execution of the Strategic Planning Activities

Educational Status and Information, Diploma, Course, Seminar and similar Certificates, Professional Title, Interviews and Evaluations		
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The personal data of the Employee Candidates is processed if they contact with the data controller by sharing their personal data verbally or physically, or via e-mail, personal rights and evaluations within the company, systemic common areas and applications within the company, computer and phone records, CCTV/ Camera Records, resumes and requests, employment and consultancy companies, accounts operated on behalf of the Data Controller through the social media channels, websites, short messages sent and information forms.

The information about the membership to associations and foundations with regard to the Employee Candidates in our Company is sensitive personal data.

This sensitive personal data is processed within the processes of collecting the resumes for vacant positions, organizing interviews with the suitable candidates, making job interviews such as interviews or exams and evaluating the candidates by the competency evaluation methods in order to enter into an employment contract or to evaluate the candidates for the suitable job descriptions in the future in the event that the candidates are suitable for a job description that is different from the position for which interview is made.

5.2. Personal Data of the Employees

The personal data of the Employees is processed if they contact with the data controller by sharing their personal data verbally or physically, or via e-mail, personal rights and evaluations within the company, systemic common areas and applications within the company, computer and phone records, CCTV/ Camera Records, resumes and requests, employment and consultancy companies, accounts operated on behalf of the Data Controller through the social media channels, websites, short messages sent and information forms.

Personal Data	Legal Reason	Purpose of Processing
<u>Identity Information</u> Name-Surname, T.R. ID No, Photograph, Nationality, Marital Status, Passport, Military Service	The processing of the personal data is mandatory for the legitimate interests of the data controller, provided that it does not impair the fundamental rights and freedoms of the data subject. The processing of the personal data of the parties to a contract is necessary, provided that it is directly related to the establishment or	Execution of the Emergency Management Processes Execution of the Information Security Processes Execution of the Employee Candidate / Intern / Student Selection and Placement Processes Execution of the Application Processes of Employee Candidates Execution of the Employee Satisfaction and Loyalty Processes
<u>Medical Information</u> Medical Report (chest radiography report, audiometry, ophthalmologic examination, EKG, fasting blood glucose, HbA1C, complete blood count), Driving License (blood type data), Occupational Accident Report		Fulfillment of the Obligations arising from the Employment Contract and the Legislation for Employees Execution of the Fringe Benefits and Interests Processes for Employees Execution of the Audit / Ethics Activities Execution of the Training Activities Execution of the Access Authorizations Execution of the Activities in compliance with

<u>Information about Criminal Conviction and Security Measures</u> Criminal Record Certificate <u>Appearance Information</u> Information about Height, Weight and Body Size regarding Appearance <u>Contact Details</u> E-Mail, Phone Number, Mobile Phone Number, Domicile <u>Location Details</u> GPRS, GPS Location <u>Personal Information</u> Information about IBAN, Salary Payment Receipts, Family Status Notification, SSI Premiums, Salary, Personal Background, Performance Evaluation Reports <u>Information about Professional Experience</u> Educational Information (Diploma, Course, Seminar, Appointment/Promotion, Professional Title), Employment Form (from the previous workplace)	performance of such contract. The personal data is made public by the data subject himself/herself.	the Legislation Execution of the Financing and Accounting Affairs Provision of the Physical Space Security Execution of the Company / Products / Services Loyalty Processes Execution of the Assignment Processes Follow-up and Execution of the Legal Affairs Execution of the Internal Audit / Investigation / Intelligence Activities Execution of the Communication Activities Planning of the Human Resources Processes Execution / Inspection of the Business Operations Execution of the Occupational Health / Safety Activities Receiving and Evaluating the Recommendations for the Improvement of the Business Processes Execution of the Activities for Ensuring the Business Continuity Organization and Event Management Execution of the Performance Evaluation Processes Execution of the Retention and Archiving Activities Execution of the Work Permit and Residence Permit Processes for Foreign Personnel Execution of the Talent / Career Development Activities Provision of Information to the Authorized Persons, Institutions and Organizations
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The personal data of the Employees is processed if they contact with the data controller by sharing their personal data verbally or physically, or via e-mail, personal rights and evaluations within the company, systemic common areas and applications within the company, computer and phone records, CCTV/ Camera Records, resumes and requests, employment and consultancy companies, accounts operated on behalf of the Data Controller through the social media channels, websites, short messages sent and information forms.

Medical reports (chest radiography report, audiometry, ophthalmological examination, EKG, fasting blood glucose, HbA1C, complete blood count), driving licenses (blood type data) and occupational accident reports, Criminal Record Certificates (status of former convicted/ criminal record), (religion and blood type indicated in the former identity card, which had been previously processed and which have not

been destroyed yet), which are the medical data of the Employees, are sensitive personal data.

This sensitive personal data can be processed for the purpose of registering the employment, creating the personal files of the personnel, payroll, registering the leave of employment, carrying out the departure procedures, visa applications, accommodation, transfer and flight ticket arrangement procedures for the personnel, fulfilling the legal requirements with regard to the occupational health and safety, and providing information to the authorized persons, institutions and organizations.

The personal medical data is obtained with the explicit consent of the Employees and this data is accessible only to the Workplace Doctor and the authorized person of the Human Resources Department.

5.3. Personal Data of the Natural Person Representatives of the Natural Person Suppliers and Business Partners and the Legal Entity Suppliers and Business Partners

Personal Data	Legal Reason	Purpose of Processing
<u>Identity Information</u> Name-Surname, T.R. ID No, Gender, Copy of Birth Certificate <u>Contact Details</u> E-Mail, Phone Number, Mobile Phone Number, Address, Domicile <u>Financial Information</u> Information about IBAN, Bank Account, Tax Identification Number <u>Visual and Audio Records</u> Camera Records <u>Information about Supplier Transactions</u> Statement of Signature, Copy of Power of Attorney if any, Tax Registration Certificate, Certificate of Activity, Circular of Signature, Trade Registry Gazette, List of Attendants when necessary, Letter of Guarantee	The processing of the personal data is mandatory for the legitimate interests of the data controller, provided that it does not impair the fundamental rights and freedoms of the data subject. The processing of the personal data of the parties to a contract is necessary, provided that it is directly related to the establishment or performance of such contract.	Execution of the Emergency Management Processes Execution of the Information and Data Processing Processes Execution of the Training Activities Execution of the Financing and Accounting Affairs Provision of the Physical Space Security Follow-up and Execution of the Legal Affairs Execution of the Occupational Health / Safety Activities Receiving and Evaluating the Recommendations for the Improvement of the Business Processes Ensuring the Business Continuity Execution of the Goods / Services Sales Processes Execution of the Goods / Services Production and Operation Processes Organization and Event Management Execution of the Risk Management Processes Execution of the Retention and Archiving Activities Execution of the Contract Processes Execution of the Strategic Planning Activities Follow-up of the Claims / Complaints Execution of the Supply Chain Management Processes Execution of the Salary Policy Execution of the Investment Processes Provision of Information to the Authorized Persons, Institutions and Organizations

Your personal data is processed through the negotiations, meetings and visits made, held and conducted for the purpose of the establishment, execution and performance of a contract with our Company and via the verbal statements, printed document transfer, execution of the commission payment transactions, e-mail, phone records, SMS and requests following the execution of the contract.

5.4. Personal Data of the Employees of the Suppliers and Business Partners

Personal Data	Legal Reason	Purpose of Processing
<u>Identity Information</u> Name-Surname, T.R. ID No <u>Contact Details</u> E-Mail, Phone Number, Mobile Phone Number, Domicile	The processing of the personal data is mandatory for the legitimate interests of the data controller, provided that it does not impair the fundamental rights and freedoms of the data subject. The processing of the personal data of the parties to a contract is necessary, provided that it is directly related to the establishment or performance of such contract.	Execution of the Emergency Management Processes Execution of the Activities in compliance with the Legislation Provision of the Physical Space Security Provision of Information to the Public Institutions and Organizations when required Execution / Inspection of the Business Operations Execution of the Goods / Services Sales Processes Execution of the Goods / Services Production and Operation Processes Organization and Event Management Execution of the Contract Processes Follow-up of the Claims / Complaints Execution of the Supply Chain Management Processes Provision of Information to the Authorized Persons, Institutions and Organizations

The personal data of the Employees of the Suppliers and Business Partners of “Eroğlu Global Holding” is processed based upon the notification to “Eroğlu Global Holding” by their employers or personally by them as authorized by their employers via the verbal statements, printed document transfer, e-mail, visitor tracking form, vehicle tracking form and CCTV/ Camera Records.

5.5. Personal Data of the Natural Person Representatives of the Natural Person Subcontractors and the Legal Person Subcontractors

Personal Data	Legal Reason	Purpose of Processing
<u>Identity Information</u> Name-Surname, T.R. ID No, Gender, Copy of Birth Certificate <u>Contact Details</u> E-Mail, Phone Number, Mobile Phone Number, Address, Domicile <u>Financial Information</u> Information about IBAN, Bank Account, Tax Identification Number <u>Visual and Audio Records</u> Camera Records <u>Information about Subcontractor Transactions</u> Statement of Signature, Copy of Power of Attorney if any, Tax Registration Certificate, Certificate of Activity, Circular of Signature, Trade Registry Gazette, List of Attendants when necessary, Letter of Guarantee	The processing of the personal data is mandatory for the legitimate interests of the data controller, provided that it does not impair the fundamental rights and freedoms of the data subject. The processing of the personal data of the parties to a contract is necessary, provided that it is directly related to the establishment or performance of such contract.	Execution of the Emergency Management Processes Execution of the Information and Data Processing Processes Execution of the Training Activities Execution of the Financing and Accounting Affairs Provision of the Physical Space Security Follow-up and Execution of the Legal Affairs Execution of the Occupational Health / Safety Activities Receiving and Evaluating the Recommendations for the Improvement of the Business Processes Ensuring the Business Continuity Execution of the Goods / Services Sales Processes Execution of the Goods / Services Production and Operation Processes Organization and Event Management Execution of the Risk Management Processes Execution of the Retention and Archiving Activities Execution of the Contract Processes Execution of the Strategic Planning Activities Follow-up of the Claims / Complaints Execution of the Supply Chain Management Processes Execution of the Salary Policy Execution of the Investment Processes Provision of Information to the Authorized Persons, Institutions and Organizations

Your personal data is processed through the negotiations, meetings and visits made, held and conducted for the purpose of the establishment, execution and performance of a contract with our Company and via the verbal statements, printed document transfer, e-mail, visitor tracking form, CCTV/ Camera Records, phone records and SMS following the execution of the contract.

5.6 Personal Data of the Employees of the Subcontractors

The personal data of the Employees of the Subcontractors of “Eroğlu Global Holding” is processed based upon the notification to “Eroğlu Global Holding” by their employers or personally by them as authorized

by their employers via the verbal statements, printed document transfer, e-mail, visitor tracking form and CCTV/ Camera Records.

Personal Data	Legal Reason	Purpose of Processing
<u>Identity Information</u> Name-Surname, T.R. ID No, Photograph, Nationality, Driving License, Passport, Military Service <u>Medical Information</u> Medical Report, Occupational Accident Report, Driving License (blood type data) <u>Information about Criminal Conviction and Security Measures</u> Criminal Record Certificate <u>Contact Details</u> E-Mail, Phone Number, Mobile Phone Number, Domicile <u>Location Details</u> GPRS, GPS Location <u>Visual and Audio Records</u> Camera Records <u>Personal Information</u> Information about IBAN, Salary Payment Receipts, Family Status Notification, SSI Premiums, Salary, Personal Background, Performance Evaluation Report <u>Information about Professional Experience</u> Educational Information (Diploma, Course, Seminar, Appointment/Promotion, Professional Title), Employment Form (from the previous workplace)	The processing of the personal data is mandatory for the legitimate interests of the data controller, provided that it does not impair the fundamental rights and freedoms of the data subject. The processing of the personal data of the parties to a contract is necessary, provided that it is directly related to the establishment or performance of such contract. The processing of the personal data is mandatory for the fulfillment by the data controller of its legal obligation.	Execution of the Emergency Management Processes Provision of the Information and Data Security Authentication of the Employees Execution / Inspection of the Business Operations. Execution of the Assignment Processes Execution of the Activities for Ensuring the Business Continuity Execution of the Activities in compliance with the Legislation Provision of the Physical Space Security Responding the Requests for Information from the Administrative and Judicial Authorities Execution of the Training Activities Follow-up and Execution of the Legal Affairs Execution / Inspection of the Business Activities Execution of the Occupational Health / Safety Activities Organization and Event Management Execution of the Retention and Archiving Activities Execution of the Contract Processes Provision of Information to the Authorized Persons, Institutions and Organizations

The personal data of the Employees of the Subcontractors of “Eroğlu Global Holding” is processed based upon the notification to “Eroğlu Global Holding” by their employers or personally by them as authorized by their employers via the verbal statements, printed document transfer, e-mail, visitor tracking form, vehicle tracking form and CCTV/ Camera Records.

Medical reports, occupational accident reports and Criminal Record Certificates (status of former convicted/ criminal record) which are the medical data of the Employees of the Subcontractors are sensitive personal data.

This sensitive personal data is processed for the purpose of executing the occupational health and safety activities, executing the emergency management processes and providing information to the authorized persons, institutions and organizations.

5.7. Personal Data of the Customers

Your personal data is processed through the negotiations, meetings and visits made, held and conducted for the purpose of the establishment, execution and performance of a contract with our Company and via the verbal statements, printed document transfer, execution of the purchase and sale transactions, e-mail, phone records, SMS and requests following the execution of the contract.

Personal Data	Legal Reason	Purpose of Processing
<u>Identity Data</u> Name-Surname, T.R. ID No	The processing of the personal data is mandatory for the legitimate interests of the data controller, provided that it does not impair the fundamental rights and freedoms of the data subject.	Provision of the Information and Data Security Execution of the Access Authorizations Execution of the Activities in compliance with the legislation Execution of the Company / Products / Services Loyalty Processes Follow-up and Execution of the Legal Affairs Execution of the Communication Activities Execution / Inspection of the Business Operations
<u>Contact Data</u> E-Mail Address, Phone Number, Address Details (Workplace- Home-Delivery- Invoice)		Execution of the Activities for Ensuring the Business Continuity Execution of the Logistic Activities Execution of the Goods / Services Purchase Processes Execution of the Goods / Services After Sales Support Services Execution of the Goods / Services Sales Processes Execution of the Goods / Services Production and Operation Processes Execution of the Strategic Planning Activities Execution of the Products / Services Marketing Processes Provision of the Data Controller Operations Security Provision of Information to the Authorized Persons, Institutions and Organizations
<u>Information about Customer Transactions</u> Shopping and Payment Details, Order Number, Order Details, Customer Order Instructions (Purchase, Change, Updating and Return of Packages etc.), Claim/ Complaint Details	The processing of the personal data of the parties to a contract is necessary, provided that it is directly related to the establishment or performance of such contract.	
<u>Financial Information</u> Information about Credit/Debit Card, IBAN, Credit Card Installments, Payment Instruction/Mail Order		
<u>Transaction Security</u> IP Address and Navigation Details, Log Records		

5.8. Personal Data of the Customers placing Product Orders

Personal Data	Legal Reason	Purpose of Processing
<u>Identity Data</u> Name-Surname, T.R. ID No <u>Contact Data</u> E-Mail Address, Phone Number, Address Details (Workplace- Home-Delivery- Invoice) <u>Information about Customer Transactions</u> Shopping and Payment Details, Order Number, Order Details, Customer Order Instructions (Purchase, Change, Updating and Return of Packages etc.), Claim/ Complaint Details <u>Financial Information</u> Information about Credit/Debit Card, IBAN, Credit Card Installments, Payment Instruction/Mail Order <u>Transaction Security</u> IP Address and Navigation Details, Log Records	The processing of the personal data is mandatory for the legitimate interests of the data controller, provided that it does not impair the fundamental rights and freedoms of the data subject. The processing of the personal data of the parties to a contract is necessary, provided that it is directly related to the establishment or performance of such contract.	Provision of the Information and Data Security Execution of the Access Authorizations Execution of the Activities in compliance with the legislation Execution of the Company / Products / Services Loyalty Processes Follow-up and Execution of the Legal Affairs Execution of the Communication Activities Execution / Inspection of the Business Operations Execution of the Activities for Ensuring the Business Continuity Execution of the Logistic Activities Execution of the Goods / Services Purchase Processes Execution of the Goods / Services After Sales Support Services Execution of the Goods / Services Sales Processes Execution of the Goods / Services Production and Operation Processes Execution of the Strategic Planning Activities Execution of the Products / Services Marketing Processes Provision of the Data Controller Operations Security Provision of Information to the Authorized Persons, Institutions and Organizations

Your personal data is processed through the negotiations, meetings and visits made, held and conducted for the purpose of the establishment, execution and performance of a contract with our Company and via the verbal statements, printed document transfer, execution of the purchase and sale transactions, e-mail, phone records, SMS and requests following the execution of the contract.

5.9. Personal Data of the Website Visitors

The Cookie Policy of “Eroğlu Global Holding” is an integral part of and an annex to this Policy. It is ensured that the Website Visitors review the Cookie Policy and obtain information about the quality of the cookies.

As the personal data of our Website Visitors, which is obtained on a process basis, varies, the processed personal data, the legal reasons for processing and the purposes of processing are determined below individually for each process.

The personal data which the Website Visitors share via the website, e-mail, application and cookies is processed.

Our Website Visitors		
Personal Data	Legal Reason	Purpose of Processing
<u>Transaction Security</u> IP Address and Navigation Details, Log Records	The processing of the personal data is mandatory for the legitimate interests of the data controller, provided that it does not impair the fundamental rights and freedoms of the data subject.	Execution of the Information Security Processes Execution / Inspection of the Business Operations Ensuring the Business Continuity Execution of the Activities in compliance with the Legislation Follow-up and Execution of the Legal Affairs Provision of the Data Security Execution of the Strategic Planning Activities Execution of the Products / Services Marketing Processes Provision of Information to the Authorized Persons, Institutions and Organizations

Our Website Visitors who make application through the Contact Us/ Write to Us fields at our Website		
Data Collection Method: By making an application through the website		
Personal Data	Legal Reason	Purpose of Processing
<u>Identity Data</u> Name-Surname <u>Contact Data</u> E-Mail Address, phone, cell phone number	The processing of the personal data is mandatory for the legitimate interests of the data controller, provided that it does not impair the fundamental rights and freedoms of the data subject.	Provision of the Information and Data Security Execution of the Communication Activities Execution / Inspection of the Business Operations Execution of the Goods / Services Purchase Processes Execution of the Goods / Services After Sales Support Services Execution of the Customer Relations Management Processes Follow-up of the Claims / Complaints Execution of the Products / Services Marketing Processes Provision of Information to the Authorized Persons, Institutions and Organizations

5.10. Personal Data of the Social Media Visitors

Personal Data	Legal Reason	Purpose of Processing
<u>Identity Information</u> Name-Surname, T.R. ID No <u>Visual and Audio Data</u> Photograph <u>Contact Details</u> Social media account, E-Mail, Mobile Phone Number <u>Location Details</u> Address	The processing of the personal data of the parties to a contract is necessary, provided that it is directly related to the establishment or performance of such contract. The personal data is made public by the data subject himself/herself.	Execution of the Information Security Processes Execution of the Company / Products / Services Loyalty Processes Follow-up and Execution of the Legal Affairs Execution of the Customer Relations Management Processes Improvement of the Processes of Ensuring Customer Satisfaction Organization and Event Management Execution of the Advertising / Campaign / Promotion Processes Execution of the Marketing Analysis Activities Execution of the Strategic Planning Activities Follow-up of the Claims and Complaints Provision of Information to the Authorized Persons, Institutions and Organizations

The personal data which is shared by the Social Media Visitors through various social media channels, accounts operated on behalf of the Company, correspondences made through the social media channels and short messages sent is processed.

5.11. Personal Data of the Shareholders

The personal data which is shared physically, or via the verbal statements, printed document transfer, correspondences exchanged between the Shareholders and the Company via their electronic mail addresses, short messages sent and information forms is processed.

Personal Data	Legal Reason	Purpose of Processing
<u>Identity Information</u> Name-Surname, T.R. ID No, Photograph, Mother's/Father's Name, Place of Birth, Date of Birth, Nationality, Marital Status, Driving License, Passport <u>Contact Details</u> E-Mail, Phone Number, Mobile Phone Number <u>Location Details</u> Domicile <u>Personal Information</u> Information about Income, Assets, Premium, IBAN, Bank Account, SSI Premiums, SSI Registration Number, Tax Identification Number, Profit Shares, Salary and Change of Salary, Vehicle License Plate <u>Information about Professional Experience</u> Educational Information	The processing of the personal data is mandatory for the legitimate interests of our Company, provided that it does not impair the fundamental rights and freedoms of the Shareholder/Partner. The processing of the personal data of the parties to any contracts, provided that it is directly related to the establishment or performance of such contracts to which the Company is a party. The processing of the personal data is expressly stipulated by the law and/or is mandatory for the fulfillment by our Company of its legal obligation.	Provision of the Physical Space Security Execution of the Information and Data Processing Processes Execution of the Activities in compliance with the Legislation Execution of the Financing and Accounting Affairs Follow-up and Execution of the Legal Affairs Provision of the Legal Transaction Security Execution of the Communication Activities Execution / Inspection of the Business Operations Organization and Event Management Execution of the Contract Processes Execution of the Strategic Planning Activities Provision of Information to the Authorized Persons, Institutions and Organizations Execution of the Management Activities

This data is processed for the purpose of ensuring the physical space security and providing information to the authorized persons, institutions and organizations.

5.12. Personal Data Captured by the CCTV

Personal Data	Legal Reason	Purpose of Processing
<u>Visual and Audio Records</u> Camera Images <u>Physical Space Security</u> Entry-Exit Camera Records, Vehicle License Plates	The processing of the personal data is mandatory for the legitimate interests of the data controller, provided that it does not impair the fundamental rights and freedoms of the data subject. The processing of the personal data is mandatory for the fulfillment by the data controller of its legal obligation.	Provision of the Physical Space Security Fulfillment of the Legal Obligation if it is requested by the Relevant Authority and it is mandatory to give response under the Judicial and Administrative Investigations Provision of Information to the Authorized Persons, Institutions and Organizations Follow-up and Execution of the Legal Affairs Execution of the Strategic Planning Activities Execution of the Emergency Management Processes

The personal data is processed through the closed circuit camera systems, access control systems and license plate recognition systems installed at the Company's premises and parking lots.

6. Transfer of the Personal Data

Your personal data is transferred to those listed below within the framework of the requirements for and purposes of processing the personal data as set forth in the Articles 8 and 9 of the PDPL for "Eroğlu Global Holding" to continue its commercial existence and in order to achieve the aforementioned purposes.

1. Our group companies and affiliates, shareholders and members of the board of directors, company officials and the relevant department within the company,
2. Consultants, attorneys, independent auditors, accountants, financial advisors, suppliers of our company, banks and insurance companies with which our company works, and authorized employees of these parties,
3. Workplace doctor, occupational health and safety and information security specialists, legally competent public and private institutions and organizations such as courts and prosecution offices,
4. Organization companies, travel agencies, airline and highway business operators, logistic service providers for cargo and courier services, logistic service providers for transportation services.

7. Keeping the Personal Data Accurate and Up-to-date

"Eroğlu Global Holding" acts in compliance with the obligation of the Data Controllers to keep the personal data accurate and up-to-date pursuant to the Article 4 of the PDPL. If the personal data which the Data Subject has shared with our Company is not accurate and up-to-date, the Data Subject may request to update the data by contacting with our Company at any time. Our Company may contact with the data subject at specific periods in order to ensure that his/her data is accurate and up-to-date if required.

8. Rights of the Personal Data Subject

Everyone has the right to apply to “Eroğlu Global Holding” in the capacity of data controller for the following issues under the Article 11 of the PDPL:

1. to learn whether their personal data has been processed or not,
2. to request relevant information if their personal data has been processed,
3. to learn the purpose of processing their personal data and whether their personal data is used as suitable for the purpose,
4. to know the third parties to whom their personal data has been transferred within the country or in abroad,
5. to request the correction of the personal data if their personal data has been processed deficiently and incorrectly,
6. to request the deletion or destruction of the personal data ex officio or upon the request of the data subject pursuant to the Article 7 of the PDPL No 6698 if the reasons that require the processing of the personal data no longer exist even though the personal data has been processed in accordance with the provisions of the PDPL and the other relevant laws,
7. to request the notification of the processes carried out pursuant to the items under the Articles 5 and 6 of the PDPL to the third parties to whom the personal data has been transferred,
8. to object to the occurrence of a result against the person himself/herself by analyzing the processed data exclusively through automated systems,
9. to request the compensation of the damage in the case of any damage due to the unlawful processing of their personal data.

9. Method of Exercising by the Personal Data Subject of his/her Rights

The “Data Subject” may notify his/her rights and requests to “Eroğlu Global Holding” under the Article 7 of this Policy. In this regard, the data subject may apply

- by personal application of the applicant, or
- by mail attached with the statement of signature, or
- via a notary public, or
- by sending the application form to KEP address of our Company with secure electronic signature defined in the name of the applicant

by using the application form available at our websites www.erogluglobal.com and proving his/her identity and relevance in order to exercise all other rights which he/she has pursuant to the Article 11 of the PDPL No 6698.

10. Measures taken for the Protection of the Personal Data

Our Company takes the necessary administrative and technical measures in order to prevent the personal data processed by it from being processed and accessed in contrary to the law and to ensure that the personal data is kept securely in accordance with the Article 12 of the PDPL and conducts the necessary audits and/or has the necessary audits conducted in this regard. While the measures that are suitable for the quality of the personal data are taken, the sensitive personal data is protected with more stringent security measures. **The Access Hierarchy Directive** has been issued by our Company and our employees have been informed about the conditions for access to the physical and electronic media under this Directive.

a. Technical Measures

- The network security and application security are ensured.
- The closed system network is used for transferring personal data via the network.
- The key management is implemented.
- The security measures that are included within the scope of the supply, development and

- maintenance of the information technology systems are taken.
- The security of the personal data stored in the cloud is ensured.
- An authorization matrix has been developed for the employees.
- The access logs are kept regularly.
- The data masking measure is implemented when necessary.
- The authorizations of the employees whose positions have been changed or who have left the job in the relevant field are revoked.
- The up-to-date anti-virus systems are used.
- The firewalls are used.
- The user account management and authorization control systems are also implemented and followed up.
- The periodical and/or random audits are conducted and had conducted within the organization.
- The logs are kept without any user intervention.
- The personal data security is followed up.
- The personal data security issues are reported promptly.
- The security of the environments containing personal data is ensured.
- The personal data is minimized as much as possible.
- The personal data is backed up and the security of the backed up personal data is also ensured.
- The secure encryption / cryptographic keys are used and managed by different departments for the sensitive personal data.
- The attack detection and prevention systems are used.
- The penetration test is implemented.
- The cyber security measures have been taken and their implementation is continuously followed up.
- The encryption is implemented.
- The inspection of the service providers processing data is ensured with regard to the data security at regular intervals.
- The awareness of the service providers processing data is ensured with regard to the data security.
- The software that prevents data loss is used.

b. Administrative Measures

- There are disciplinary regulations which include provisions regarding the data security for the employees.
- The training and awareness raising activities on the data security are carried out for the employees at regular intervals.
- The corporate policies have been prepared and started to be implemented in respect of access, information security, usage, retention and destruction.
- The non-disclosure agreements are executed.
- The contracts executed include the provisions regarding the data security.
- The additional security measures are taken for the personal data that is transferred as hardcopy and the relevant document is sent in the form of a classified document.
- The personal data security policies and procedures have been established.
- The necessary security measures are taken for the entry into and exit from the physical environments containing personal data.
- The security of the physical environments containing personal data is ensured against external risks (fire, flood, etc.).
- The personal data is minimized as much as possible.
- The current risks and threats have been identified.
- The protocols and procedures for the security of the sensitive personal data have been established and are implemented.
- If the sensitive personal data is to be sent via electronic mail, it is necessarily sent as encrypted and by using KEP or corporate mail account.
- The sensitive personal data transferred in flash memory, CD or DVD media is transferred by encryption.

11. Transfer of the Personal Data to Abroad

As a rule, our Company does not transfer the personal data to abroad. If the personal data is required to be transferred to abroad, the action shall be taken in accordance with the Article 9 of the Personal Data Protection Law.

12. Enforcement and Application

This Policy came into force on the date of signing. In the event that the entire Policy or certain articles thereof is/are updated, the updates come into force on the date of publication. The Policy is published at our websites (www.erogluglobal.com) with its most up-to-date version.