



**YILDIRIM GROUP OF COMPANIES**

**GROUP POLICY ON THE PROTECTION**

**AND PROCESSING OF PERSONAL DATA**

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| <b>Prepared By</b>             | <b>Att. Ç. Saba UĞURERKAN</b><br><b>HR Compliance Manager</b>                 |
| <b>1st Approval</b>            | <b>Osman ÜNAL</b><br><b>Chief Human Resources Officer</b>                     |
| <b>Effective Date Approval</b> | <b>Robert Yüksel YILDIRIM</b><br><b>President and Chief Executive Officer</b> |

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## 1. SECTION 1- INTRODUCTION

### 1.1 Scope

Protection and processing of personal data is one of the key priorities of Yıldırım Group of Companies (“**Group Companies**”), and the Group Companies take utmost care to ensure compliance with the applicable national and international regulations to which they are subject in this regard.

This Group Policy on the Protection and Processing of Personal Data of Yıldırım Group of Companies (the “**Group Policy**”) defines the key guidelines taken into consideration with a view to ensuring compliance by Yıldırım Group of Companies with the Personal Data Protection and Processing Legislation (“**Data Protection Compliance**”), as well as the principles to be complied with by the Group Companies in this respect.

### 1.2 Objective

With a view to achieving the objective of creating unity within the Group Companies, all members of Yıldırım Group of Companies establish the necessary system to raise awareness on Compliance with the Personal Data Protection and Processing Legislation within their organization, and establish the necessary mechanism required to ensure the sustainability of Data Protection Compliance in their internal operations.

The Group Policy aims to guide the Group Companies to ensure the diligent implementation of the regulations set forth by the legislation on the protection and processing of personal data. This Group Policy on the Protection and Processing of Personal Data of Yıldırım Group of Companies aims to ensure a high level and sustainable compliance of each Group Company in parallel with the importance Yıldırım Group of Companies attaches to Data Protection Compliance.

### 1.3 Roles & Responsibilities

Yıldırım Compliance Manager provides leadership in establishing a global compliance ecosystem in order to ensure Data Protection Compliance within Yıldırım Group of Companies. Regulations, procedures, guidelines, standards and training activities will be prepared and implemented by Group Companies in accordance with the Applicable Legislation and Group Policy. The **Group Company Data Protection Contact** appointed by each of the Group Companies will ensure the necessary communication between the company and the headquarters, and cooperate with Yıldırım Compliance Manager in order to prevent legal risks, as well as to ensure compliance of group companies with the Applicable Legislation and Group Policy. All companies, employees, bodies and departments of Yıldırım Group of Companies are responsible for monitoring compliance with this Group Policy.

### 1.4 Implementation of Group Policy and the Applicable Legislation

Group Companies carry out personal data processing activities in accordance with the Applicable Legislation and Group Policy. Yıldırım Group of Companies currently operates in 56 countries across 5

continents. Applicable Legislation means the European Union General Data Protection Regulation (“GDPR”), the Law No. 6698 on the Protection of Personal Data (“LPPD”) and other applicable legislation, depending on the location and data processing activities of the Group Company. In this context, the provisions of the Applicable Legislation shall prevail with respect to the protection and processing of personal data for Group Companies. The Group Policy defines the rules set forth by the Applicable Legislation, as well as the basic principles that the Group Companies must comply with within the scope of Data Protection Compliance.

### **1.5 Effective Date of Group Policy**

The Group Policy is published on the website of Yıldırım Holding A.Ş. (“Yıldırım Holding”) [www.yildirimgroup.com](http://www.yildirimgroup.com) and the websites of the Group Companies, and shall be deemed to have entered into effect upon its publication.

## **2. SECTION 2- PRINCIPLES ADOPTED BY YILDIRIM GROUP OF COMPANIES REGARDING THE PROTECTION OF PERSONAL DATA**

### **2.1 Ensuring the Security of Personal Data**

Yıldırım Group of Companies takes the necessary data security measures and carries out or has others carry out the necessary inspections in order to prevent unlawful disclosure and transfer of, or access to, personal data or security deficiencies that may occur in other ways in accordance with the Applicable Legislation.

### **2.2 Protection of Special Categories of Personal Data**

Special importance is attached to certain personal data due to the possibility that their unlawful processing may lead to victimization of persons or discrimination against them. These data consist of data related to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of association, foundation or trade-union, health, sexual life, criminal conviction and security measures, as well as data related to biometrics and genetics.

The data security measures taken by Yıldırım Group of Companies for the protection of personal data are also carefully implemented in relation to special categories of personal data, and necessary audits are ensured to be carried out.

Detailed information on the processing of special categories of personal data is provided in Section 3.3. (“Processing of Special Categories of Personal Data”) of this Group Policy.

## **2.3 Raising Awareness Among Business Units on the Protection and Processing of Personal Data and Their Supervision with Respect to the Issue**

Group Companies periodically organize the necessary awareness-raising trainings to ensure that personal data are processed and retained in accordance with the law and to prevent unlawful access to personal data. In addition, the Group Companies establish the necessary systems to increase the awareness of their employees on Data Protection Compliance and work in cooperation with expert consultants in the field if needed.

## **3. SECTION 3- PRINCIPLES ADOPTED BY YILDIRIM GROUP OF COMPANIES REGARDING THE PROCESSING OF PERSONAL DATA**

### **3.1 Processing of Personal Data in Accordance with the Principles stipulated in the Applicable Legislation**

#### **3.1.1 Processing in line with the Law and the Principle of Good Faith**

Yıldırım Group of Companies acts in line with the general principles of trust and good faith, as well as the principles imposed by the legal provisions as regards the processing of personal data, and observes the interests and reasonable expectations of data subjects.

#### **3.1.2 Ensuring Personal Data to be Accurate and Up-To-Date When Needed**

Yıldırım Group of Companies makes the utmost effort to ensure that personal data are kept accurate and up-to-date throughout the period of processing, and takes the necessary measures to this end.

#### **3.1.3 Processing for Specified, Explicit and Legitimate Purposes**

Yıldırım Group of Companies clearly sets out the purposes of processing personal data, and processes personal data for purposes related to business activities.

#### **3.1.4 Being Relevant, Limited and Proportionate to the Purposes for which Data are Processed**

Yıldırım Group of Companies collects personal data only to the extent and quality required by its business activities, and processes personal data for the purposes limited to the specified purposes.

#### **3.1.5 Being Retained for the Term Required for the Fulfillment of the Intended Processing Purpose or Specified in the Applicable Legislation.**

If there is a period stipulated in the legislation, Yıldırım Group of Companies retains personal data for such period; and if no such period is stipulated, the retention period is limited to the period required for the purpose of processing personal data.

## **3.2 Conditions for Processing of Personal Data**

### **3.2.1 Conditions for Processing of Personal Data Pursuant to the LPPD**

The Group Company processes personal data in accordance with the LPPD within the framework of the commercial/legal relationship or business relationship with the data subject in the following cases:

- i)* if it is explicitly stipulated in the law;
- ii)* if it is necessary to process personal data for fulfillment of a legal obligation of the Group Company;
- iii)* if it is necessary to process personal data of parties to a contract, provided that it is directly related to the execution or performance of a contract to which the data subject is a party;
- iv)* if the relevant data has been revealed to the public by the data subject herself/himself;
- v)* if it is necessary [to process personal data] to protect the life or physical integrity of the data subject or another person where the data subject is physically or legally incapable of giving consent;
- vi)* if processing is mandatory to establish, exercise or protect a right; and
- vii)* if it is mandatory to process data for the legitimate interest of the Group Company provided that the fundamental rights and freedom of data subject are not harmed; or
- viii)* if data subject has given his/her explicit consent.

### **3.2.2 Conditions for Processing of Personal Data pursuant to the GDPR**

The Group Company processes personal data in accordance with the GDPR within the framework of the commercial/legal relationship or business relationship with the data subject in the following cases:

- i)* if the data subject has provided consent for the data processing activity;
- ii)* if it is necessary for the performance of a contract to which the data subject is a party or to carry out the necessary transactions in line with the requests of the data subject in preparation for the contract;
- iii)* if it is necessary to process personal data for fulfillment of a legal obligation of the Group Company;
- iv)* if it is necessary in order to protect the vital interests of the data subject or of another natural person;
- v)* if it is necessary for the Group Company to fulfill a task in the public interest or to exercise the official power vested in it, and/or

*vi)* if it is mandatory to process data for the legitimate interest of the Group Company or a third party provided that the fundamental rights and freedom of data subject are not harmed.

### **3.3 Processing of Special Categories of Personal Data**

Special categories of personal data are processed by Yıldırım Group of Companies in accordance with the principles set forth in the Applicable Legislation and this Group Policy and by taking all necessary data security measures, including the methods to be determined by the Personal Data Protection Board (“**Board**”) and/or the Relevant Data Protection Authority.

### **3.4 Obligation to Inform the Data Subject**

Yıldırım Group of Companies fulfills its obligation to inform by ensuring that data subjects are informed in accordance with the Applicable Legislation. In this scope, the Group Company informs the data subjects about by whom personal data are processed in the capacity of data controller and for what purposes they are processed, with whom and for what purposes they are shared, whether they are used in accordance with their purpose, by which methods they are collected, the legal grounds for processing and the rights of the data subjects within the scope of the processing of their personal data.

### **3.5 Transfer of Personal Data Processed by Yıldırım Group Companies to Yıldırım Holding and Their Processing**

Personal data processed by Yıldırım Group Companies may also be processed by Yıldırım Holding for the purposes of carrying out the activities of Yıldırım Group Companies in accordance with the principles, objectives and strategies of the group and protecting the rights and interests and reputation of Yıldırım Group Companies. In this connection; i) the Group Company processes the personal data that it will transfer to Yıldırım Holding in accordance with the data processing conditions stipulated in the Applicable Legislation and transfers it to the Holding, ii) the Group Company informs the data subjects whose personal data it will transfer to Yıldırım Holding, in accordance with the Applicable Legislation, including the purposes for which Yıldırım Holding will process such data, and obtains the explicit consent of the data subjects if required by the Applicable Legislation.

### **3.6 Transfer of Personal Data**

Yıldırım Group of Companies may transfer personal data and/or special categories personal data of the data subjects to third parties (companies, public and private institutions and organizations, third party natural persons, etc.) upon taking the necessary security measures in line with the purposes of personal data processing. Group Companies act in accordance with the regulations stipulated in the Applicable Legislation during the transfer of personal data. Detailed information on the personal data processed by the Group Company in relation to this matter, processing methods and purposes of personal data processing can be found in the document provided in Annex 5 of this Group Policy (Annex 5: Third Parties to whom Personal Data is Transferred and Purposes of Transfer).



### 3.6.1 Domestic Transfer of Personal Data

Personal data other than special categories of personal data may be transferred by Yildirim Group of Companies to domestic third parties *without the explicit consent* of the data subject, provided that they are transferred on the basis of the legal grounds set forth below and in the applicable legislation, that due care is exercised and that all necessary security measures are taken, including the methods to be determined by the Board and/or the Relevant Data Protection Authority:

- if it is explicitly stipulated in the law;
- if it is necessary [to transfer personal data] to protect the life or physical integrity of the data subject or another person where the data subject is physically or legally incapable of giving consent;
- if it is necessary to transfer personal data of parties to a contract, provided that it is directly related to the execution or performance of a contract to which the data subject is party;
- if it is necessary to transfer personal data for fulfillment of a legal obligation of the Group Company;
- if it is transferred by the Group Company for purposes limited to the purpose of its disclosure to the public; provided that such personal data has been made public by the data subject itself;
- if transfer of personal data by the Group Company is mandatory to establish, exercise or protect the rights of the Group Company or the data subject or a third party;
- if it is mandatory to transfer personal data for the legitimate interest of the Group Company provided that the fundamental rights and freedom of the data subject are not harmed.

Yildirim Group of Companies may perform domestic transfer of special categories of personal data only upon explicit consent of the data subject, or provided that such transfer is based on the grounds set forth in Section 3.3 (“Processing of Special Categories of Personal Data”) of this Group Policy.

Yildirim Group of Companies may transfer the personal data of the data subjects to third parties located in the country in order to fulfill the personal data processing purposes listed in Annex 2 (Annex 2: Personal Data Processing Purposes and Methods). Detailed information on the third parties to whom personal data are transferred and the purposes of transfer is provided in Annex 5.

### 3.6.2 Transfer of Personal Data Abroad

#### (i) Transfer Abroad Pursuant to the LPPD

Yildirim Group of Companies may process and transfer personal data abroad upon the explicit consent of the data subjects. However, personal data other than special categories of personal data may be

transferred abroad without the explicit consent of the data subject in line with the data transfer conditions stipulated in the legislation, provided that such transfer is based on the legal grounds listed in Article 3.6.1. special categories of personal data may be transferred abroad without the explicit consent of the data subject in line with the data transfer conditions stipulated in the LPPD, provided that such transfer is based on the conditions set forth in section 3.3. (“Processing of Special Categories of Personal Data”) of this Group Policy, to the extent the following conditions are met:

- If there is adequate protection in the foreign country to which the personal data will be transferred;
- In case there is no adequate protection, Yıldırım Group of Companies and the data controllers in the relevant foreign country must undertake in writing to provide adequate protection and the Board’s authorization must be obtained.

Without prejudice to the provisions of international agreements, in the event that the interests of Turkey or the relevant data subject may be seriously harmed, Yıldırım Group of Companies may only transfer personal data abroad upon obtaining the opinion of the relevant public institution or organization, as well as the permission of the Board.

Yıldırım Group of Companies may transfer the personal data of the data subjects to third parties located abroad in order to fulfill the personal data processing purposes listed in Annex 2 (Annex 2: Personal Data Processing Purposes and Methods). Detailed information on the third parties to whom personal data are transferred and the purposes of transfer is provided in Annex 5.

#### **(ii) Transfer Pursuant to the GDPR**

Yıldırım Group of Companies may transfer personal data and special categories of personal data to countries outside the European Economic Area (“EEA”).

In order for the personal data of the data subject to be transferred to countries outside the EEA, the country to which the personal data is to be transferred must be one of the countries providing an adequate level of protection in accordance with European Commission decisions.

If the country to which the personal data is to be transferred is not listed among the countries providing an adequate level of protection in accordance with European Commission decisions, Yıldırım Group of Companies performs the data transfer on the basis of the following as applicable:

- binding corporate rules;
- standard contractual clauses published and/or approved by the European Commission.

If the above-mentioned conditions are not met, the transfer may be made in the presence of the following exceptional circumstances in accordance with the GDPR:

- if data subject has given his/her explicit consent;
- if data subject enters into a contractual relationship which requires the transfer of data abroad;
- if a contract is concluded or performed between a data controller and a third party for the benefit of the data subject;
- in case of public interest;
- for the purpose of establishing, executing or defending legal claims;
- if the vital interests of the data subject or other persons are to be protected in cases where the data subject is physically or legally incapable of giving consent;

In cases where none of these conditions apply and transfers cannot be based on an adequacy decision or appropriate assurances, a transfer may only be performed when it is necessary for the overriding legitimate interests of Yıldırım Group of Companies, provided that such transfer will not be permanent and concerns a limited number of data subjects.

#### **4. SECTION 4 - CLASSIFICATION OF PERSONAL DATA PROCESSED BY GROUP COMPANIES AND PURPOSES OF PROCESSING**

Yıldırım Group of Companies processes personal data based on at least one of the grounds for personal data processing specified in this Group Policy and in a restricted manner upon informing the data subjects in accordance with the Applicable Legislation.

Detailed information on the purposes of processing such personal data is provided in Annex 2 of this Group Policy ("Annex 2: Personal Data Processing Purposes and Methods").

Within the framework of the purposes and conditions specified in this Policy, detailed information on the classification and categories of personal data processed is included in Annex 4 ("Annex 4: Personal Data Categories") of the Group Policy.

#### **5. SECTION 5- RETENTION AND DISPOSAL OF PERSONAL DATA**

Yıldırım Group of Companies retains the personal data for the term required for their processing purpose and the minimum term set forth in the applicable legal legislation. In this connection, first of all, Yıldırım Group of Companies determines whether the applicable legislation provides for any term for the retention of personal data, and if such term has been provided, personal data are retained during such term. If there is no legal term, personal data are retained for the term required for the purpose of personal data processing. At the end of the determined retention periods, personal data are disposed at periodic disposal intervals or in line with the data subject's application and using the destruction method determined (erasure and/or destruction and/or anonymization).

## 6. SECTION 6- RIGHTS OF DATA SUBJECTS AND EXERCISE OF THESE RIGHTS

### 6.1 Rights of the Data Subject

#### 6.1.1 Rights of Data Subjects Pursuant to the LPPD

Data subjects may exercise the following rights defined in the LPPD upon applying to Yıldırım Group of Companies:

- Learning whether their personal data are processed;
- If personal data are processed, requesting information on such processing;
- Learning the purpose of the processing of the personal data and whether such collected data are used for the intended purpose;
- Learning the identity of third parties to whom personal data are transferred in or out of the country;
- Requesting rectification of any personal data which is processed incompletely or inaccurately, and requesting erasure or destruction of personal data in line with Art. 7 of the LPPD;
- In the event the reasons for processing personal data cease to exist, although such data had been processed in compliance with the Law, requesting personal data to be erased or destroyed, and requesting third parties to whom their personal data were transferred to be informed of this operation;
- Filing an objection against an outcome which is against their interest, as a result of analysis of the processed personal data solely through automated systems;
- Claiming compensation of any damages suffered as a result of unlawful processing of the personal data; and
- Withdrawing the explicit consent given for the processing and/or transfer of personal data.

#### 6.1.2 Rights of Data Subjects Pursuant to the GDPR

Data subjects may exercise the following rights in line with Section 3 of the GDPR upon applying to Yıldırım Group of Companies:

*(i)* being informed about data processing activities;

*(ii)* access;

*(iii)* rectification;

(iv) the right to be forgotten (erasure);

(v) restriction of processing activity;

(vi) requesting these procedures related to rectification or erasure or restriction of processing activities to be notified to third parties to whom personal data are transferred;

(vii) data portability;

(viii) objection;

(ix) not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or which significantly affects data subjects in a similar manner, as well as withdrawal of explicit consent at any time

## 6.2 Exercise by Data Subjects of Their Rights

In order for data subjects to exercise their rights listed in section 6.1. of this Group Policy ("*Rights of the Data Subject*") in accordance with the Applicable Legislation, data subjects are required to submit their requests in writing to the relevant Group Company together with the information that will allow their identification. If you have not received a response to your request from the relevant Group Company within the period specified in the Applicable Legislation, you can contact us at the contact addresses below to forward your request to the Yildirim Compliance Manager:

- i. by e-mail to be sent to [dataprotection@yildirimgroup.com](mailto:dataprotection@yildirimgroup.com);
- ii. by mail to be sent to the address of YILDIRIM Tower, Maslak Mahallesi, Taşyoncası Sok. No:1C B2 Blok, 34485 Sarıyer/İstanbul.

## 6.3 Response of the Group Companies to the Applications by Data Subjects

The Group Companies take the necessary data security measures to conclude the applications to be filed by the data subjects in accordance with the Applicable Legislation.

In the event that the data subject duly submits his/her request regarding the rights set out in section 6.1 ("*Rights of the Data Subject*") to the Group Company, the Group Company shall conclude the relevant request free of charge as soon as possible and within the period specified in the Applicable Legislation at the latest (within 30 (thirty) days as per the LPPD), depending on the nature of the request. However, if the transaction requires additional costs, a fee may be charged in accordance with the tariff determined by the Board/Relevant Data Protection Authority.

## ANNEX 1 - DEFINITIONS

For the purposes of this Group Policy, the following definitions shall apply:

- **“Explicit Consent”** shall refer to the informed consent given freely for a specific matter.
- **“Obligation to Inform”** shall refer to the obligation of the data controller to inform the data subjects about the identity of the data controller and its representative, if any, the purpose for which personal data will be processed, to whom and for what purpose personal data may be transferred, the method and legal grounds for collecting personal data and the rights they have during the collection of personal data.
- **“Anonymization”** shall refer to making it impossible to associate personal data with an identified or identifiable natural person in any manner whatsoever even if they are matched with other data.
- **“Binding Corporate Rules”** shall refer to the data protection policy to be used for intra-group data transfers outside the European Union, to which Yıldırım Group of Companies is subject.
- **“GDPR”** shall refer to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation).
- **“Group Policy”** shall refer to this Group Policy on the Protection and Processing of Personal Data of Yıldırım Group of Companies.
- **“Group Company Data Protection Contact”** shall refer to the Group Company Data Protection Contact appointed by each of Yıldırım Group Companies, who will ensure the necessary communication between the company and the headquarters and cooperate with Yıldırım Compliance Manager in order to prevent legal risks, as well as to ensure compliance of group companies with the Applicable Legislation and Group Policy.
- **“Applicable Legislation”** is the general term that refers to the data protection and processing legislation that companies operating in different countries must comply with. This scope includes national and international regulations on the protection, processing, retention and transfer of personal data. In accordance with the legal framework of the countries in which the Company operates, the Applicable Legislation contains the requirements for the protection of data confidentiality and the conduct of data processing processes in accordance with legal standards. Applicable Legislation means the European Union General Data Protection Regulation (“GDPR”), the Law No. 6698 on the Protection of Personal Data (“LPPD”) and other legislation, depending on the location and data processing activities of the Group Company.
- **“Relevant Data Protection Authority”** is the general term that refers to the data protection authorities established in the countries in which companies operating in different countries are

located and which are responsible for monitoring the implementation of the data protection legislation in force in the relevant country in order to protect the fundamental rights and freedoms of natural persons in relation to processing.

- **“Personal Data”** shall refer to any kind of information related to an identified or identifiable natural person.
- **“Processing of Personal Data”** shall refer to any operation, which is performed on personal data, such as collection, recording, storage, retention, alteration, adaptation, disclosure, transmission, acquisition, making retrievable, classification or making it impossible to be used, whether with fully or partially automated methods, or with non-automated methods, provided that it is a part of a data recording system.
- **Compliance with Personal Data Protection and Processing Legislation (“Data Protection Compliance”)**: shall refer to the adherence and compliance of a legal entity, organization or natural person with the laws and regulations governing the protection, collection, retention and use of personal data. This term includes ensuring that practices and procedures comply with legal requirements, thus protecting the privacy of natural persons and maintaining the integrity of their personal data.
- **“Board”** shall refer to the Personal Data Protection Board of the Republic of Turkey.
- **“Authority”** shall refer to the Personal Data Protection Authority of the Republic of Turkey.
- **“LPPD”**: shall refer, for the purposes of the Turkish law, to the Law numbered 6698 on the Protection of Personal Data published in the Official Gazette dated 7 April 2016 and numbered 29677.
- **“Joint Data Controller”** shall refer to persons who jointly determine the purposes and means of data processing.
- **“Special Categories of Personal Data”** shall refer to personal data related to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of association, foundation or trade-union, health, sexual life, criminal conviction and security measures, and biometrics and genetics.
- **“Standard Contractual Clauses”** shall refer to the standard and pre-approved sample data protection provisions published by the European Commission to be used for data transfers to countries outside the European Economic Area.
- **“Data Breach”** shall mean a security breach that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

- **“Data Processor”** shall refer to the natural or legal third person processing personal data relying on the powers granted by Yıldırım Group of Companies.
- **“Data Recording System”** shall refer to any recording system through which personal data used by Yıldırım Group of Companies are processed by structuring according to specific criteria.
- **“Data Subject”** shall refer to the natural person whose personal data is processed.
- **“Data Controller”** shall refer to a natural person or legal entity who determines the purposes and means of processing of personal data and is responsible for establishing and managing a data recording system and Yıldırım Group of Companies.
- **“Yıldırım Holding”** shall refer to Yıldırım Holding Anonim Şirketi.
- **Yıldırım Group of Companies (“Group Company/Companies”)**: shall refer to all companies included in Yıldırım Group of Companies.
- **“Transfer Abroad”** shall refer to transfer of personal data from one jurisdiction to another. For companies located in the European Union and according to the European Union legislation, transfer abroad is carried out only if 3 (three) conditions are present cumulatively:
  - if the data controller or data processor is subject to the GDPR for the relevant processing activity;
  - if the data exporter discloses personal data to another data controller, joint data controller or processor by transmission or otherwise, and
  - if the party to whom the data is transferred is located outside the European Economic Area (Member States of the European Union, Iceland, Liechtenstein and Norway), regardless of whether or not it is subject to the GDPR in respect of the relevant processing activity.



## ANNEX 2 - PERSONAL DATA PROCESSING PURPOSES AND METHODS

### Personal Data Processing Purposes

The purposes of processing and transferring the personal data of data subjects by Yıldırım Group of Companies are governed by the purposes and grounds described below, in addition to the Group's scope set forth in its articles of association. These Personal Data Processing Purposes are specified in general terms for the Group Companies, and are regulated by each Group Company in accordance with the data processing processes of the company.

In case of changes in the purposes of personal data processing, the Data Controllers Registry Information System ("VERBIS") notifications are updated simultaneously in accordance with the LPPD.

- Carrying out communication operations;
- Carrying out/supervising business operations;
- Conducting goods and service sale processes;
- Conducting finance and accounting works;
- Conducting advertising and marketing activities;
- Conducting the product and services marketing processes;
- Conducting marketing analysis activities;
- Carrying out activities for ensuring business continuity;
- Conducting goods and service procurement processes;
- Conducting after-sales support services for goods and services;
- Conducting customer relations management processes;
- Conducting contractual processes;
- Carrying out logistic operations;
- Conducting supply chain management processes;
- Carrying out reporting activities;
- Conducting payment processes;
- Conducting inspection and internal inspection processes;
- Carrying out operations in line with the legislation;
- Conducting corporate communications processes;
- Following up and conducting legal affairs;
- Carrying out retention and archiving activities;
- Collection and assessment of recommendations for improvement of business processes;
- Follow-up of requests and complaints;
- Informing the authorized institutions and organizations;
- Carrying out management operations;

- Fulfillment of obligations related to employees arising from labor contract and the legislation;
- Carrying out training operations;
- Posting on the company intranet;
- Execution of processes related to employees' sidebenefits and rights;
- Conducting occupational health and safety activities;
- Conducting workplace disciplinary processes;
- Conducting employee satisfaction and engagement processes;
- Conducting assignment processes;
- Monitoring workplace entries and exits;
- Carrying out company's internal communication operations;
- Implementation of remuneration policy;
- Conducting selection and placement processes for candidate employees, interns and students;
- Carrying out the application processes of the candidates, carrying out the performance evaluation processes,
- Work and residence permit procedures for foreign staff;
- Carrying out supervision and ethics operations;
- Carrying out talent and career development activities;
- Creating and following visitor records;
- Carrying out internal inspection/investigation/intelligence activities;
- Follow-up and supervision of equipment entrusted;
- Resolving user issues and providing technical support;
- Ensuring information security and managing processes and projects related to information security;
- Informing the authorized people, institutions and organizations;
- Ensuring physical space safety;
- Ensuring cyber safety; and
- Providing Wi-Fi to users.

### Methods of Personal Data Processing

Yıldırım Group of Companies carries out its personal data processing activities through automated and non-automated methods in physical or electronic environment. Yıldırım Group of Companies obtains personal data through the following means. These Personal Data Processing Methods are specified in general terms for the Group Companies and are regulated by each Group Company in accordance with the data processing processes of the company.

- E-mail;
- Phone, mobile phone;
- SMS;
- Mail;
- Courier;
- Website;
- Social media accounts and other platforms;
- Virtual environments;
- Delivery by hand;
- Contracts;
- Catalogues;
- Application forms;
- Photo and video camera records.

### **ANNEX 3 - DATA SUBJECTS**

These Data Subjects are specified in general terms for the Group Companies and are regulated by each Group Company in accordance with the data processing processes of the company.

| <b>Data Subject Class</b>                     | <b>Description</b>   |
|---|--|
| Employee                                      | shall refer to real persons who work for Yıldırım Group of Companies on the basis of an employment contract.   |
| Candidate Employee                            | shall refer to real persons who apply for a job at Yıldırım Group of Companies.  |
| Employee-Designated Persons                   | shall refer to real persons with whom the employee communicates and/or whose personal data the employee collects within the scope of Yıldırım Group of Companies' processes and activities.                                    |
| Consultant                                    | shall refer to real persons who work together and/or from whom consultancy services are received within the scope of organizations such as trainings, events, seminars and projects conducted by the Group Companies.          |
| Addressee to Lawsuits / Execution Proceedings | shall refer to the real persons who are counterparties to the lawsuits and execution proceedings to which Yıldırım Group of Companies and/or its employees are a party, and/or their employees and authorized representatives. |
| Employees of Yıldırım Group of Companies      | shall refer to real persons who work for the Companies included in Yıldırım Group of Companies on the basis of an employment contract.   |
| Business Partner                              | shall refer to the officers or directors of the companies with which Yıldırım Group of Companies has formed an alliance or partnership and/or with which it carries out joint activities.                                      |
| Shareholder/Partner                           | shall refer to the real person shareholders, and/or authorized representatives of the legal person shareholders, of Yıldırım Group of Companies.   |

|   |  |
|---|--|
| Relevant Managers                                       | shall refer to real persons who work for Yıldırım Group of Companies in the capacity of manager.   |
| Owner   | shall refer to real persons and/or the employees and authorized representatives of legal entities who own the commodity subject to the procurement of goods and services.                |
| Potential Product or Service Buyer / Potential Customer | shall refer to real persons and/or the employees and authorized representatives of legal entities who have the potential to buy the commodity subject to the sale of goods and services. |
| Intern  | shall refer to real persons who work for Yıldırım Group of Companies in order to gain experience in, and knowledge about, the works performed in Yıldırım Group of Companies.            |
| Contact Persons   | shall refer to persons who communicate with Yıldırım Group of Companies through their websites or social media accounts.   |
| Supplier Employee                                       | shall refer to real persons who work for the suppliers providing products and services to Yıldırım Group of Companies.   |
| Authorized Representative of Supplier                   | shall refer to real person authorized representatives of the suppliers providing products and services to Yıldırım Group of Companies.   |
| Product Buyer or Service Recipient / Customer           | shall refer to real persons and/or the employees and authorized representatives of legal entities who buy the commodity subject to the sale of goods and services.                       |
| Visitor   | shall refer to real persons who visit the workplaces of Yıldırım Group of Companies.   |

#### ANNEX 4 - DATA SUBJECT CATEGORIES

These Personal Data Categories are specified in general terms for the Group Companies, and are regulated by each Group Company in accordance with the data processing processes of the company.

| Personal Data Categories | Description  |
|--------------------------|--|
| Identity                 | shall refer to information such as name and last name, mother's and father's name, birth date, birth place, civil status, identity card series and sequence numbers, and identification number.  |
| Communication Details    | shall refer to information such as address, phone number, e-mail Address, and registered e-mail address.   |
| Personal Information     | shall refer to information such as payroll information, disciplinary investigation, employment certificate records, asset notification information, military service information, marital status, CV information, performance assessment reports.                          |
| Legal Transaction        | shall refer to the information contained in the case files and the information contained in the correspondence exchanged with the judicial authorities.  |
| Customer Transaction     | shall refer to information such as invoices, bonds, check information, order information, request information, etc.  |
| Physical Space Security  | shall refer to information such as the entrance-exit records of employees and visitors, and camera records.  |
| Internet Cookies         | Cookies are text files containing small amounts of information that are downloaded to a computer or mobile device when a website is visited and allow the site to recognize the device. Cookies are personal data as long as they allow identification or identifiability. |
| Transaction Security     | shall refer to information such as IP address information, website entrance and exit information, password and keyword information.  |
| Risk Management          | shall refer to information such as the information processed for managing commercial, technical and administrative risks.  |

|   |   |
|---|---|
| Finance   | shall refer to information such as balance sheet information, financial performance information, loan and risk information, and information on assets.              |
| Professional Experience   | shall refer to information such as diploma information, courses attended, on-the-job training information, certificates, and transcript information.                |
| Marketing   | shall refer to information such as surveys, cookie records, and information acquired through campaigns.   |
| Audiovisual Records   | shall refer to information such as visual and audio recordings contained in images such as photographs and camera records.  |
| Health Data   | shall refer to information such as information on disability status, blood group information, personal health data, and information on devices and prostheses used. |
| Criminal Conviction and Security Measures                                   | shall refer to information such as information on criminal convictions, and information on security measures.   |
| Organization Data   | shall refer to information obtained during organizations such as events, trainings and seminars.  |
| Help Desk Complaint and Request Information                                 | shall refer to the information obtained within the scope of complaints and requests submitted to the Company.   |
| Travel-Related Membership Information                                       | shall refer to membership information obtained during the conduct of travel organizations.  |
| Personal Data that may be Processed within the Scope of Second Party Audits | shall refer to the information obtained during the audits carried out within the scope of procurement processes.  |
| Accommodation List  | shall refer to information such as information obtained during the conduct of visitor processes.  |

### ANNEX 5 – THIRD PARTIES TO WHOM PERSONAL DATA ARE TRANSFERRED AND PURPOSES OF TRANSFER

In accordance with Section 3.6 of this Group Policy, Yıldırım Group of Companies may transfer personal data to the following domestic or foreign recipient groups. Third parties to whom these personal data are transferred and the purposes of transfer are specified in general terms for the Group Companies, and are regulated by each Group Company in accordance with the data processing processes of the company.

- To the business partners of Yıldırım Group of Companies;
- To the customers, suppliers and service providers of Yıldırım Group of Companies;
- To the companies included in the Yıldırım Group of Companies;
- To authorized public institutions and organizations;
- To the relevant natural persons or private legal entities.

| Third Parties to Whom Personal Data Are Transferred                              | Purposes of Transfer   |
|--|--|
| To the business partners of Yıldırım Group of Companies                          | Limited to the achievement of the purpose of business partnership  |
| To the customers, suppliers and service providers of Yıldırım Group of Companies | Limited to the provision to Yıldırım Group of Companies of the services outsourced by Yıldırım Group of Companies from the supplier and required for performance by Yıldırım Group of Companies of its commercial activities   |
| To Yıldırım Group of Companies   | Limited to planning the strategies of Yıldırım Group of Companies for its commercial activities, carrying out its commercial activities that require the participation of Group Companies, maintaining intra-group reporting and activities, and inspecting purposes |
| To authorized public institutions and organizations                              | Limited to the purpose requested by the relevant public institutions and organizations for the fulfillment of legal obligations  |



**YILDIRIM GROUP OF COMPANIES  
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To the relevant natural persons or private legal entities.

Limited to natural persons or private legal entities who have a legal/commercial relationship with Yildırım Group of Companies for the purpose of performance of contracts

## **ANNEX 6- SECURITY OF PERSONAL DATA**

Yıldırım Group of Companies shall take all kinds of data security measures required for preventing the unlawful processing of, and unlawful access to, personal data, and ensuring an appropriate safety level required for the lawful retention of personal data. These data security measures are specified in general terms for the Group Companies, and may be separately regulated by each Group Company in accordance with the data processing processes of the company.

- Network security and application security are ensured.
- Security measures are taken for the provision, development and maintenance of IT systems.
- Security is ensured for the personal data stored in cloud.
- Disciplinary regulations are put in place which contain provisions governing data security for employees.
- An authorization matrix is created for the employees.
- Personal data are kept in locked cabinets.
- Access logs are kept regularly and in a manner that does not allow user intervention.
- Corporate policies are prepared and started to be implemented for access, information security, usage, retention and disposal.
- Data masking methods are used when needed.
- Personal data are shared with third parties upon being anonymized.
- Confidentiality undertakings are provided.
- Undertakings are provided regarding the Protection of Personal Data.
- The authorizations of the employees whose positions have been changed or who quit job are cancelled.
- Up-to-date anti-virus systems are used.
- Firewalls are used.
- Personal data security policies and procedures are defined.

- Personal data security is monitored.
- Necessary security measures are taken for access to and exits from physical environments containing personal data.
- The security of physical environments containing personal data is ensured against external risks (fire, flood, etc.).
- The security of environments containing personal data is ensured.
- Personal data are reduced as much as possible.
- Personal data are backed up, and the security of the backed up data is also ensured.
- Attack detection and prevention systems are used.
- Penetration test is implemented.
- Encryption is performed.

In the event that personal data is processed by another natural or legal person on its behalf, Yıldırım Group of Companies pays utmost attention to the issues to be taken into consideration in determining the relevant data processor and is jointly responsible together with the data processors for taking the measures specified in this Group Policy.

Yıldırım Group of Companies also carries out or has others carry out the necessary inspections in order to ensure the implementation of the provisions of the Applicable Legislation in its own institutions or organizations and, where possible, on the part of the data processors.

In the event that the processed personal data are unlawfully obtained by others, Yıldırım Group of Companies notifies this situation to Yıldırım Holding or to Yılport Holding in case the relevant company is a Yılport Group company, in any case within 24 (twenty-four) hours at the latest, and to the Board/Relevant Data Protection Authority within 72 (seventy-two) hours at the latest. The Board, if necessary, may declare such situation on its website or by other means which it deems appropriate. In addition, once the persons affected by the data breach have been identified, the breach must be notified to the data subject within a reasonable period of time.

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|--------------------------------|---|--|
| <b>Prepared By</b>             | <b>Att. Ç. Saba UĞURERKAN<br/>HR Compliance Manager</b>                 |  |
| <b>1st Approval</b>            | <b>Osman ÜNAL<br/>Chief Human Resources Officer</b>                     |  |
| <b>Effective Date Approval</b> | <b>Robert Yüksel YILDIRIM<br/>President and Chief Executive Officer</b> |  |