



YILDIRIM HOLDİNG ANONİM ŞİRKETİ

POLICY ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

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

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1. SECTION 1- INTRODUCTION

1.1. Scope

Processing and protection of personal data is one of the key priorities of Yıldırım Holding A.Ş. (“**Yıldırım Holding**” or the “**Company**”), and the Company takes utmost care to ensure compliance with the applicable national and international regulations to which it is subject. With a view to ensuring compliance with the personal data protection legislation, this Policy on the Protection and Processing of Personal Data (the “**Policy**”) describes the personal data processing activities of Yıldırım Holding, the guidelines and principles taken into consideration during these activities, the measures to ensure data security and the rights of data subjects. This Policy aims to establish a standard for the protection of personal data within Yıldırım Group, provide an overview of Yıldırım Group’s personal data processing activities and provide data subjects with information in this regard.

1.2. Implementation of the Policy and the Applicable Legislation

Yıldırım Holding carries out its personal data processing activities in compliance with the Law No. 6698 on the Protection of Personal Data (“**LPPD**” or the “**Law**”) and the European Union General Data Protection Regulation (“**GDPR**”) (the “**Applicable Legislation**”) that applies to its relevant activities. In this context, the provisions of the Applicable Legislation shall prevail with respect to the processing and protection of personal data. The Policy sets forth the principles established by the Applicable Legislation by embedding them in the context of Company’s practices.

1.3. Effective Date of the Policy

The Policy is published on the website of Yıldırım Holding www.yildirimgroup.com, and shall be deemed to have entered into effect upon its publication.

2. SECTION 2- PRINCIPLES ADOPTED BY YILDIRIM HOLDING REGARDING THE PROTECTION OF PERSONAL DATA

2.1. Ensuring the Security of Personal Data

Yıldırım Holding takes the necessary administrative and technical 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 Article 12 of the LPPD.

2.2. Protection of Special Categories of Personal Data

The Law attaches special importance 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 administrative and technical measures taken by Yıldırım Holding for the protection of personal data are also carefully implemented in relation to special categories of personal data and necessary inspections 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 Policy.

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

Yıldırım Holding periodically organizes 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, Yıldırım Holding establishes the necessary systems to increase the awareness of the Company employees on the protection of personal data, and works in cooperation with expert consultants in the field if needed.

3. SECTION 3- PRINCIPLES ADOPTED BY YILDIRIM HOLDING 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 Holding 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 Holding makes the utmost effort to ensure that personal data is 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 Holding 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 Holding 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 Holding 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. The details on how the retention and disposal of personal data will be carried out are set forth in Yıldırım Holding's Personal Data Retention and Disposal Policy.

3.2. Conditions for Processing of Personal Data

3.2.1. Conditions for Processing of Personal Data pursuant to the LPPD

Yıldırım Holding 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 Yıldırım Holding; *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 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

Yıldırım Holding 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 Yıldırım Holding; *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 Yıldırım Holding 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 Yıldırım Holding 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 Holding in accordance with the principles set forth in the Policy and by taking all necessary administrative and technical measures, including the methods to be determined by the Personal Data Protection Board ("**Board**"), provided that the following conditions are met:

- **Special categories of personal data other than health and sexual life data** may be processed without the explicit consent of the data subject, if there is an explicit provision allowing the processing of personal data in the law to which the relevant activity is subject. Otherwise, the explicit consent of the data subject shall be obtained for the processing of such sensitive personal data.
- **Special categories of personal data relating to health and sexual life** may be processed by persons under the obligation of confidentiality or authorized institutions and organizations without the data subject's explicit consent for purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and care services, and planning and management of health services and their financing. Otherwise, the explicit consent of the data subject shall be obtained for the processing of such special categories personal data.

3.4. Obligation to Inform the Data Subject

Yıldırım Holding fulfills its obligation to inform by ensuring that data subjects are informed in accordance with the Applicable Legislation. In this scope, Yıldırım Holding 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. Processing by Yıldırım Holding of Personal Data Processed by Yıldırım Group Companies

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.

3.6. Transfer of Personal Data

Yıldırım Holding may transfer personal data and/or special categories of personal data of the data subject to third parties (companies, public and private institutions and organizations, third party natural persons) upon taking the necessary security measures in line with the purposes of personal data processing. Our Company acts 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 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 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 Yıldırım Holding to domestic third parties *without the explicit consent* of the data subject provided that they are transferred on the basis of the below-listed legal grounds, that due care is exercised and that all necessary security measures are taken, including the methods to be determined by the Board:

- 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 a party;
- if it is necessary to transfer personal data for fulfillment of a legal obligation of Yıldırım Holding;
- if it is transferred by the 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 Company is mandatory to establish, exercise or protect the rights of the Company or the data subject or a third party;
- if it is mandatory to transfer personal data for the legitimate interest of Yıldırım Holding provided that the fundamental rights and freedom of the data subject are not harmed.

Yıldırım Holding 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 Policy.

Yıldırım Holding 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

Yıldırım Holding 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. Sensitive 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 conditions set forth in section 3.3. (“Processing of Special Categories of Personal Data”) of this Policy, provided, however, that

- there must be adequate protection in the foreign country to which the personal data will be transferred; and
- in case there is no adequate protection, Yıldırım Holding 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 Holding 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 Holding 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 Holding 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 Holding 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 Holding, 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 YILDIRIM HOLDING AND PURPOSES OF PROCESSING

Yıldırım Holding processes personal data based on at least one of the grounds for personal data processing specified in this 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 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 Policy.

5. SECTION 5- RETENTION AND DISPOSAL OF PERSONAL DATA

Yıldırım Holding 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 Holding 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).

The details on how the retention and disposal of personal data will be carried out are set forth in Yıldırım Holding’s Personal Data Retention and Disposal Policy.

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 Holding:

- 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 Holding: **(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 Policy ("*Rights of the Data Subject*"), data subjects are required to submit their requests in writing to the Yıldırım Holding through any of the following communication methods, together with the information that will allow their identification:

- i. by e-mail to be sent to kvkkyildirimholding@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 our Company to the Applications by Data Subjects

Yıldırım Holding takes the necessary administrative and technical 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 our Company, the Company shall conclude the relevant request free of charge as soon as possible and within 30 (thirty) days at the latest, 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.

ANNEX 1 - DEFINITIONS

For the purposes of this 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 Holding 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).
- **“Applicable Legislation”** for the purposes of the personal data processing activities of Yıldırım Holding, shall refer to the Law No. 6698 on the Protection of Personal Data and the European Union General Data Protection Regulation that applies to its relevant activities.
- **“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 data, such as collection, recording, storage, retention, alteration, adaptation, disclosure, transmission, acquisition, making retrievable, classification or making it impossible to be accessed, whether with fully or partially automated methods, or with non-automated methods, provided that it is a part of a data recording system.
- **“Board”** shall refer to the Personal Data Protection Board.
- **“Authority”** shall refer to Personal Data Protection Authority.
- **“LPPD”**: shall refer to the Law numbered 6698 on the Protection of Personal Data published in the Official Gazette dated 7 April 2016 and numbered 29677.
- **“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.

- **“Policy”**: shall refer to this Policy on the Protection and Processing of Personal Data of Yıldırım Holding Anonim Şirketi.
- **“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.
- **“VERBİS”** shall refer to the Data Controller Registry Information System.
- **“Data Processor”** shall refer to the natural or legal third person processing personal data relying on the powers granted by Yıldırım Holding.
- **“Data Subject” (“Relevant Person”)** 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 Holding.
- **“Yıldırım Group of Companies”** shall refer to all companies included in Yıldırım Group.
- **“Yıldırım Holding A.Ş.” (“Company”)** shall refer to Yıldırım Holding Anonim Şirketi.

ANNEX 2 - PERSONAL DATA PROCESSING PURPOSES AND METHODS

Personal Data Processing Purposes

In case of changes in the purposes of personal data processing, the Data Controllers Registry Information System (“**VERBİS**”) notifications are updated simultaneously.

The purposes of processing and transferring the personal data of data subjects by Yıldırım Holding are limited to the purposes and grounds described below, in addition to the Group’s scope set forth in its articles of association.

- 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;
- Corporate organization and event management;
- Conducting corporate organization and event shootings;
- 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;
- Conducting investment processes;
- 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' side benefits 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;
- Developing and/or improving human resources processes and products;
- Building the employer brand;
- Conducting travel and accommodation activities;
- 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;
- Execution of all processes related to websites, including design and security;
- Ensuring physical space safety;
- Ensuring cyber safety; and
- Providing Wi-Fi to users.

Methods of Personal Data Processing

Yıldırım Holding carries out its personal data processing activities through automated and non-automated methods in physical or electronic environment. Yıldırım Holding obtains personal data through the following means.

- 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

Data Subject Class	Description
Employee	shall refer to real persons who work for Yıldırım Holding on the basis of an employment contract.
Candidate Employee	shall refer to real persons who apply for a job at Yıldırım Holding.
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 Holding's 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 Company.
Lawsuits / Execution Proceeding Respondent	shall refer to the real persons who are counterparties to the lawsuits and execution proceedings to which Yıldırım Holding and/or its employees are a party, and/or their employees and authorized representatives.
Event Participants	shall refer to real persons and/or the employees and authorized representatives of legal entities who participate in Yıldırım Holding's corporate organizations and events.
Employees of Yıldırım Group	shall refer to real persons who work for the Yıldırım Group Companies on the basis of an employment contract.
Business Partner	shall refer to the officers or directors of the companies with which Yıldırım Holding 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 Holding.
Relevant Managers	shall refer to real persons who work for Yıldırım Holding in the capacity of manager.
Speaker	shall refer to persons who participate as speaker in organizations such as trainings, events, seminars and projects carried out by the Company.
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 sales of goods and services.
Intern	shall refer to real persons who work for Yıldırım Holding in order to gain experience in, and knowledge about, the works performed in Yıldırım Holding.
Contact Persons	shall refer to persons who communicate with Yıldırım Holding through the company website or social media accounts.
Supplier Employee	shall refer to real persons who work for the suppliers providing products and services to Yıldırım Holding.
Authorized Representative of Supplier	shall refer to real person authorized representatives of the suppliers providing products and services to Yıldırım Holding.
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 Holding.

YILDIRIM HOLDİNG A.Ş.
POLICY ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

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ANNEX 4 - DATA SUBJECT CATEGORIES

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.
Location	shall refer to the information on the location of the data subject.
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 inspections carried out within the scope of procurement processes.
Accommodation List	shall refer to information such as information obtained during the conduct of visitor processes.

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Vehicle Information

shall refer to information such as information obtained during the conduct of internal service processes such as vehicle license plates.

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

In accordance with Section 3.6 of this Policy, Yıldırım Holding may transfer personal data to the following domestic and/or foreign recipient groups.

- To the business partners of Yıldırım Holding
- To the customers, suppliers and service providers of Yıldırım Holding
- To 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 Holding	Limited to the achievement of the purpose of business partnership
To the customers, suppliers and service providers of Yıldırım Holding	Limited to the provision to Yıldırım Holding of the services outsourced by Yıldırım Holding from the supplier and required for performance by Yıldırım Holding of its commercial activities
To Yıldırım Group of Companies	Limited to planning the strategies of Yıldırım Holding 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

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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 Yıldırım Holding for the purpose of performance of contracts

ANNEX 6- SECURITY OF PERSONAL DATA

Yıldırım Holding shall take all kinds of technical and administrative 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. Yıldırım Holding retains personal data in an accurate and up-to-date manner in line with the following methods, including but not limited to those published on the VERBIS website:

- 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 real or legal person on its behalf, Yıldırım Holding 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 Policy.

Yıldırım Holding 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 Holding notifies this situation to the Board 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.