

PERSONAL DATA PROTECTION AND PROCESSING POLICY Version

1.1

Publication Date: 12.10.2023

PART 1

ENTRANCE

This policy, prepared within the scope of the protection of personal data, has been prepared for use throughout our company named below.

Our company;

PD THREE REAL ESTATE INVESTMENT LIMITED COMPANY

Protecting personal data is among our company's top priorities. The most important aspect of this policy is the protection and processing of personal data of our customers, guests, potential customers, prospective employees, company shareholders, company officials, visitors, employees, shareholders, and officials of institutions we collaborate with, and third parties. Our Company's activities related to protecting our employees' personal data are governed by the Company Employees Personal Data Protection and Processing Policy, which was drafted in accordance with the principles set forth in this Policy.

According to the Constitution of the Republic of Turkey, everyone has the right to request the protection of their personal data. Regarding the protection of personal data, which is a constitutional right, the Company demonstrates due diligence in protecting the personal data of its customers, potential customers, job candidates, company shareholders, company officials, visitors, employees, shareholders, and officials of partner institutions, and third parties, as governed by this Policy, and has made this a company policy.

In this context, the Company is obliged to protect personal data processed in accordance with the relevant legislation. Necessary administrative and technical measures are taken by its shareholders within its borders.

This Policy covers the basic principles that our company has adopted in the processing of personal data and are listed below.

Detailed explanations will be provided: •

- Processing personal data in accordance with the law and the rules of integrity, •
- Keeping personal data accurate and up-to-date when necessary, •
- Processing personal data for specific, clear and legitimate purposes, •
- Processing personal data in a way that is linked to the purpose for which they are processed, limited and proportionate, • Processing personal data for the period stipulated in the relevant legislation or necessary for the purpose for which preservation,
- Enlightening and informing personal data owners, • Establishing the necessary system for personal data owners to exercise their rights, • Taking the necessary measures for the protection of personal data, • Acting in accordance with the relevant legislation and the regulations of the Personal Data Protection Board in the transfer of personal data to third parties in line with the requirements of the processing purpose,
- Showing due sensitivity to the processing and protection of special personal data.

1.2. PURPOSE OF THE POLICY

The main purpose of this Policy is to provide explanations regarding the personal data processing activities carried out by our company in accordance with the law and the systems adopted for the protection of personal data, and to ensure transparency by informing the persons whose personal data are processed by our company, especially our customers, potential customers, employees, job candidates, company shareholders, company officials, visitors, employees, shareholders and officials of the institutions we cooperate with, and third parties.

1.3 SCOPE

This Policy concerns all personal data of our customers, potential customers, employees, job candidates, company shareholders, company officials, visitors, employees, shareholders and officials of the institutions we cooperate with, and third parties, processed automatically or non-automatically, provided that it is part of any data recording system.

The scope of application of this Policy to the groups of personal data owners in the categories specified above may be the entire Policy (e.g., our active customers who are also our visitors); or it may only include certain provisions (e.g., only our visitors).

1.4 IMPLEMENTATION OF THE POLICY AND RELATED LEGISLATION

The relevant legal regulations in effect regarding the processing and protection of personal data will primarily apply to our company structure. In the event of any inconsistency between the applicable legislation and the Policy, our Company acknowledges that the applicable legislation and law will prevail.

The Policy is a concretization and organization of the rules set forth in relevant legislation within the scope of our Company's practices. Our Company is implementing the necessary systems and preparations to comply with the effective periods stipulated in the Personal Data Protection Law.

1.5 ENFORCEMENT OF THE POLICY

This Policy, prepared by our Company, was created on June 4, 2018, and revised on June 11, 2019, to reflect our evolving business processes and compliance with Law No. 6698, and entered into force as version 1.1. If the entire Policy or specific articles are renewed, the effective date of the Policy will be updated.

The policy is published on our Company's website and in all affiliated businesses and facilities and personal data are made available to the relevant persons upon the request of their owners.

2. ISSUES RELATED TO THE PROTECTION OF PERSONAL DATA

In accordance with Article 12 of the Personal Data Protection Law, our company has taken the necessary technical and administrative measures to ensure an appropriate level of security in order to prevent the unlawful processing of personal data it processes, to prevent unlawful access to data, and to ensure the preservation of data. In this context, it has the necessary infrastructure security audits and cyber security audits carried out through domestic audit purchases.

2.1. ENSURING THE SECURITY OF PERSONAL DATA

2.1.1. Technical and Administrative Measures Taken to Ensure the Lawful Processing of Personal Data Our Company takes technical and administrative measures according to technological possibilities and implementation costs to ensure the lawful processing of personal data.

- (i) **Technical Measures Taken to Ensure Lawful Processing of Personal Data** The main technical measures taken by our company to ensure lawful processing of personal data are listed below: • Personal data processing activities carried out within our company are audited. • The technical measures taken are reported periodically to the relevant party as required by the internal audit mechanism. • In technical matters, the servers within our company that hold personal data are all located in a single location, and the necessary security measures have been taken for all our employee computers and data entry computers. This ensures easier management and security of data.
- (ii) **Administrative Measures Taken to Ensure Lawful Processing of Personal Data** The main administrative measures taken by our Company to ensure lawful processing of personal data are listed below: • Employees are informed and trained on personal data protection law and the lawful processing of personal data. • All activities carried out by our Company are analyzed in detail across all business units, and as a result of this analysis, personal data processing activities specific to the commercial activities carried out by the relevant business units are revealed.
 - The personal data processing activities carried out by our company's business units; the requirements to be fulfilled to ensure compliance with the personal data processing conditions sought by Law No. 6698 and GDPR compliance for these activities are determined specifically for each business unit and the detailed activities it carries out. • In order to ensure legal compliance requirements determined on a per-business unit basis, awareness is raised and application rules are determined for the relevant business units; the auditing of these issues and the implementation of these

Necessary administrative measures to ensure continuity are implemented through internal company policies and training.

- The contracts and documents governing the legal relationship between our Company and employees include clauses that impose an obligation not to process, disclose or use personal data, except for the instructions of the Company and exceptions stipulated by law, and employee awareness is raised and audits are carried out on this issue.

2.1.2. Technical and Administrative Measures Taken to Prevent Unlawful Access to Personal Data Our Company takes technical and administrative measures according to the nature of the data to be protected, technological possibilities and implementation costs in order to prevent reckless or unauthorized disclosure, access, transfer or any other unlawful access of personal data.

(i) **Technical Measures Taken to Prevent Unlawful Access to Personal Data** The main technical measures taken by our Company to prevent unlawful access to personal data are listed below: • Technical measures are taken in accordance with the developments in technology, and the

measures taken are periodically updated.

is being updated and renewed.

- Access and authorization technical solutions are implemented in accordance with legal compliance requirements determined on a business unit basis. • Technical

measures taken are periodically reported to the relevant parties as required by the internal audit mechanism, and risk

The necessary technological solutions are being developed by re-evaluating the issues that constitute the issue.

- Software and hardware including virus protection systems and firewalls are being installed. • All data management has been centralized.

(ii) **Administrative Measures Taken to Prevent Unlawful Access to Personal Data** The main administrative measures taken by our Company to prevent unlawful access to personal data are listed below: Employees are trained on technical measures to prevent unlawful

- access to personal data. Access and authorization processes for personal data are designed and implemented within the Company in accordance with

- business unit-based legal compliance requirements. Employees are informed that they cannot disclose the personal data they obtain to anyone else in violation of the provisions of the Personal Data

- Protection Law and the GDPR, or use it for purposes other than its intended purpose, and that this obligation continues after they leave their job, and the necessary commitments are obtained from them accordingly.

- Contracts executed by our Company with individuals to whom personal data is lawfully transferred include provisions stipulating that individuals to whom personal data is transferred will take the necessary security measures to protect personal data and ensure compliance with these measures within their own organizations.
- 2.1.3. Storage of Personal Data in Secure Environments** Our Company takes the necessary technical and administrative measures, based on technological possibilities and implementation costs, to ensure that personal data is stored in secure environments and to prevent its destruction, loss, or alteration for unlawful purposes.

(i) **Technical Measures Taken to Store Personal Data in Secure Environments** The main technical measures taken by our Company to store personal data in secure environments are listed below:

- Systems compatible with technological advancements to store personal data in secure environments is used.

- Technical security systems are established for storage areas, technical measures taken are periodically reported to the relevant parties as required by the internal audit mechanism, and risky issues are re-evaluated and the necessary technological solutions are produced.

- Backup programs are used in accordance with the law to ensure the safe storage of personal data.

(ii) **Administrative Measures Taken to Store Personal Data in Secure Environments** The main administrative measures taken by our company to store personal data in secure environments are listed below: • Employees are trained to ensure the secure storage of personal data. • In case our company receives an external service due to technical requirements for the storage of personal data, the relevant companies to which personal data is legally transferred are contacted.

The contracts concluded include provisions that the persons to whom personal data is transferred will take the necessary security measures to protect personal data and ensure that these measures are complied with in their own organizations.

2.1.4. Auditing of Measures Taken to Protect Personal Data: Our Company conducts or commissions the necessary internal audits in accordance with Article 12 of the Personal Data Protection Law. The results of these audits are reported to the relevant department within the scope of the Company's internal operations, and necessary actions are taken to improve the measures taken.

that Measures to be Taken in Case of Unauthorized Disclosure of Personal Data: Our Company operates a system that ensures personal data processed in accordance with Article **2.1.5.12** of the Personal Data Protection Law is obtained by others through unlawful means, and that this is reported to the relevant data subject and the Personal Data Protection Board as soon as possible. If deemed necessary by the Personal Data Protection Board, this situation may be announced on the Personal Data Protection Board's website or by another method.

2.2. PROTECTING THE RIGHTS OF THE DATA OWNER

Creating channels through which these rights can be conveyed to our company and evaluating the requests of data owners;

Our company carries out the necessary channels, internal operations, administrative and technical arrangements in accordance with Article 13 of the Personal Data Protection Law in order to evaluate the rights of personal data owners and to provide the necessary information to personal data owners.

If personal data owners submit their requests regarding their rights listed below to our Company in writing, our Company will finalize the request free of charge as soon as possible and within thirty days at the latest, depending on the nature of the request.

However, if the transaction requires an additional cost, our Company will collect the fee specified in the tariff determined by the Personal Data Protection Board. Personal data owners have the right to;

- Learn whether their personal data has been processed,
 - Request information regarding their personal data if they have been processed,
 - Learn the purpose of processing personal data and whether they are used in accordance with their purpose,
 - Know the third parties to whom personal data is transferred, whether domestically or abroad,
 - Request correction of personal data if it is processed incompletely or incorrectly, and to request the necessary corrections in this context.
- to request that the transaction be notified to third parties to whom personal data has been transferred,
- To request the deletion or destruction of personal data in case the reasons requiring processing are eliminated, even though it has been processed in accordance with the provisions of the Personal Data Protection Law and other relevant laws, and to request that the action taken in this context be notified to third parties to whom personal data has been transferred,
 - By analyzing the processed data exclusively through automatic systems, a person is not harmed.
 - objecting to the outcome,
 - In the event of any damages incurred due to the unlawful processing of personal data, the data subject has the right to demand compensation for the damages. More detailed information regarding the rights of data owners is provided in Section 10 of this Policy.

2.3. PROTECTION OF SPECIAL NATURE PERSONAL DATA

With the Personal Data Protection Law, special importance is given to certain personal data due to the risk of causing victimization or discrimination in the event of unlawful processing.

These data include data regarding race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership in associations, foundations or unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data.

Our Company is meticulous in protecting sensitive personal data, which is designated as "special" by the Personal Data Protection Law and processed in accordance with the law. In this context, the technical and administrative measures taken by our Company to protect personal data are implemented with care with respect to special personal data, and the necessary controls are maintained within our Company.

Detailed information regarding the processing of special categories of personal data is included in Section 3 of this Policy.

2.4. BUSINESS UNITS ON THE PROTECTION AND PROCESSING OF PERSONAL DATA INCREASING AWARENESS AND SUPERVISION

Our company organizes the necessary training for business units to raise awareness about preventing the unlawful processing of personal data, unlawful access to data, and ensuring the preservation of data.

In our company and all our other branches, the necessary systems are established to raise awareness of the current employees of the business units and the newly incorporated employees of the business units regarding the protection of personal data, and we work with professionals when necessary.

2.5. INCREASING THE AWARENESS AND SUPERVISION OF BUSINESS PARTNERS AND SUPPLIERS ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

Our company organizes training and seminars for its business partners to prevent the unlawful processing of personal data, to prevent unlawful access to data, and to raise awareness about ensuring the preservation of data.

Necessary systems are established to raise awareness of the protection of personal data among our company's current employees and newly incorporated employees within the business unit, and we work with professionals when necessary.

All activities conducted to raise awareness among our company's business partners regarding the protection and processing of personal data are reported to our company's management and shareholders. To this end, our company applies supplier confidentiality agreements to all its business partners and ensures the same level of sensitivity to the protection of personal data with its business partners in accordance with the relevant contractual provisions.

In accordance with Article 4 of the Personal Data Protection Law, our company processes personal data in accordance with the law and principles of integrity; accurately and, where necessary, up-to-date; and for specific, clear, and legitimate purposes; and in a purpose-related, limited, and proportionate manner. Our company retains personal data for the period stipulated by law or required for the purpose of processing personal data.

In accordance with Article 5 of the Personal Data Protection Law, our company processes personal data based on one or more of the conditions in Article 5 of the Personal Data Protection Law regarding the processing of personal data.

In accordance with Article 10 of the Personal Data Protection Law, our company informs personal data owners and provides the necessary information when personal data owners request information.

Our company acts in accordance with the regulations regarding the processing of special personal data in accordance with Article 6 of the Personal Data Protection Law.

Our company acts in accordance with the regulations stipulated in the law and set forth by the Personal Data Protection Board regarding the transfer of personal data, in accordance with Articles 8 and 9 of the Personal Data Protection Law.

3. ISSUES RELATED TO THE PROCESSING OF PERSONAL DATA

3.1. PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH THE PRINCIPLES SET FORTH IN THE LEGISLATION

3.1.1. Processing in Accordance with Law and the Rule of

Honesty Our Company acts in accordance with the principles introduced by legal regulations and the general rule of trust and honesty in the processing of personal data. In this context, our Company takes proportionality requirements into account in the processing of personal data and does not use personal data for purposes other than those required.

3.1.2. Ensuring Personal Data is Accurate and, Where Necessary, Up-to-Date . Our

Company ensures that the personal data it processes is accurate and up-to-date, taking into account the fundamental rights of personal data owners and their legitimate interests. It takes the necessary measures to this end. For example, our Company has established a system for personal data owners to correct and verify the accuracy of their personal data. Detailed information on this topic is provided in Section 10 of this Policy.

3.1.3. Processing for Specific, Clear, and Legitimate Purposes :

Our Company clearly and precisely defines the legitimate and lawful purpose of processing personal data. Our Company processes personal data in connection with the services it provides and to the extent necessary for these purposes. The purposes for which personal data will be processed by our Company are determined before any personal data processing activity begins.

3.1.4. Relevance, Limitation, and Proportionality to the Purpose of

Processing: Our Company processes personal data in a manner conducive to achieving the designated purposes and avoids processing personal data that is not relevant or necessary to achieve the purpose. For example, personal data processing is not conducted to meet needs that may arise later.

3.1.5. Storage for the Period Stipulated in the Relevant Legislation or Necessary for the Purpose for which they are Processed Don't

Our Company retains personal data only for the period specified in relevant legislation or necessary for the purpose for which it is processed. In this context, our Company first determines whether relevant legislation stipulates a retention period for personal data. If so, it complies with this period. If no such period is specified, it retains personal data for the period necessary for the purpose for which it is processed. Upon expiration of this period or the elimination of the reasons requiring processing, our Company deletes, destroys, or anonymizes personal data. Our Company does not retain personal data for potential future use. Detailed information on this matter is provided in Section 9 of this Policy.

3.2. PROCESSING OF PERSONAL DATA BASED ON ONE OR MORE OF THE PERSONAL DATA PROCESSING CONDITIONS SPECIFIED IN ARTICLE 5 OF THE KVK LAW AND LIMITED TO THESE CONDITIONS

The protection of personal data is a constitutional right. Fundamental rights and freedoms may be restricted only by law, without prejudice to their essence, and solely for the reasons specified in the relevant articles of the Constitution. Pursuant to the third paragraph of Article 20 of the Constitution, personal data may only be processed in cases prescribed by law or with the individual's explicit consent. Accordingly, and in accordance with the Constitution, our Company processes personal data only in cases prescribed by law or with the individual's explicit consent. Detailed information on this subject is provided in Section 7 of this Policy.

3.3. INFORMATION AND ENLIGHTENMENT OF PERSONAL DATA OWNERS

In accordance with Article 10 of the Personal Data Protection Law, our company informs data subjects when collecting personal data. In this context, we inform data subjects about the identity of our company and its representative, if any, the purposes for which personal data will be processed, to whom and for what purposes the processed personal data may be transferred, the method and legal basis for collecting personal data, and the rights of data subjects. Detailed information on this subject is provided in Section 10 of this Policy.

Article 20 of the Constitution establishes that everyone has the right to be informed about personal data concerning them. Accordingly, Article 11 of the Personal Data Protection Law lists the right to "request information" among the rights of personal data owners. In this context, our Company provides the necessary information when a personal data owner requests information, in accordance with Articles 20 of the Constitution and 11 of the Personal Data Protection Law. Detailed information on this subject is provided in Section 10 of this Policy.

3.4. PROCESSING OF SPECIAL NATURE PERSONAL DATA

Our company strictly abides by the regulations stipulated in the Personal Data Protection Law when processing personal data designated as "special categories" by the Personal Data Protection Law.

Article 6 of the Personal Data Protection Law identifies certain personal data as "special categories" if it is processed unlawfully and carries a risk of causing victimization or discrimination. This data includes data related to race, ethnicity, political views, philosophical beliefs, religion, sect, or other beliefs, appearance, membership in associations, foundations, or unions, health, sexual life, criminal convictions, security measures, and biometric and genetic data.

In accordance with the Personal Data Protection Law, our Company processes special personal data in the following cases, provided that adequate measures are taken by the Personal Data Protection Board: • If the personal data owner has given

their explicit consent, or • If the personal data owner does

not give their explicit consent; – Special personal

data other than the health and sexual life of the personal data owner, in the cases stipulated by law, – Special personal data regarding the health and sexual life of the personal data owner are processed only by persons or authorized institutions and organizations that are under a confidentiality obligation for the purpose of protecting public health, providing preventive medicine, medical diagnosis, treatment and care services. - The highest level of precautions have been taken within the company for the processing and recording of special data.

As soon as the data processing is completed, it is destroyed regardless of the destruction period.

3.5. TRANSFER OF PERSONAL DATA

- Our Company may transfer personal data and special personal data of data subjects to third parties (third-party companies, business partners, and third-party natural persons) by taking the necessary security measures in line with the lawful purposes of processing personal data. In this regard, our Company complies with the regulations stipulated in Article 8 of the Personal Data Protection Law. Detailed information on this matter is provided in Section 6 of this Policy.

3.5.1. Transfer of Personal Data

Our company may transfer personal data to third parties in line with legitimate and lawful personal data processing purposes, based on and limited to one or more of the personal data processing conditions specified in Article 5 of the Law listed below: If there is explicit consent of the personal data owner;

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- If there is a clear regulation in the law regarding the transfer of personal data,
 - If it is necessary to protect the life or physical integrity of the personal data owner or someone else and the personal data owner is unable to give his consent due to actual impossibility or if his consent is not legally valid;
- If it is necessary to transfer personal data of the parties to the contract, provided that it is directly related to the establishment or execution of a contract,
- If personal data transfer is mandatory for our company to fulfill its legal obligations,
 - If personal data has been made public by the personal data owner, If
 - personal data transfer is mandatory for the establishment, exercise or protection of a right, If personal
 - data transfer is mandatory for the legitimate interests of our Company, provided that it does not harm the fundamental rights and freedoms of the personal data owner.

3.5.2. Transfer of Special Personal Data

Our company may transfer the personal data owner's special data to third parties in line with legitimate and lawful personal data processing purposes by exercising due care, taking the necessary security measures and taking the adequate measures prescribed by the Personal Data Protection Board, in the following cases:

- If the personal data owner has given explicit consent, or
- If the personal data owner does not give explicit consent;

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Personal data of a personal data owner other than their health and sexual life (data related to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or unions, criminal convictions and security measures, and biometric and genetic data) may be disclosed in cases stipulated

– by law. Personal data of a personal data owner related to their health and sexual life may only be disclosed by persons or authorized institutions and organizations under a confidentiality obligation for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and planning and managing healthcare services and their financing.

3.6. TRANSFER OF PERSONAL DATA ABROAD

Our Company does not transfer personal data abroad for lawful personal data processing purposes, except for the special cases specified in Articles 3.6.1 and 3.6.2. In this regard, our Company complies with the regulations stipulated in Article 9 of the Personal Data Protection Law. Detailed information on this matter is provided in Section 6 of this Policy.

3.6.1. Transfer of Personal Data Abroad

Our company processes personal data for legitimate and lawful personal data processing purposes only if the personal data owner has explicit consent or if there is no explicit consent of the personal data owner, in the event of one of the following situations: To Foreign Countries Where Data Controllers Have Sufficient Protection or Promise Sufficient Protection can transfer:

- If there is a clear regulation in the laws regarding the transfer of personal data, • If it is mandatory to protect the life or physical integrity of the personal data owner or someone else and the personal data owner is unable to give his consent due to actual impossibility or his consent is not granted legal validity;
- Belonging to the parties to a contract, provided that it is directly related to the establishment or execution of a contract. If the transfer of personal data is necessary,
- If the transfer of personal data is mandatory for our company to fulfill its legal obligation, • If the personal data has been made public by the personal data owner, • If the transfer of personal data is mandatory for the establishment, exercise or protection of a right, • Provided that it does not harm the fundamental rights and freedoms of the personal data owner, it is for the legitimate interests of our company. If personal data transfer is mandatory.

3.6.2. Transfer of Special Personal Data Abroad

Our company does not transfer special data abroad except in the following cases.

Although it does not transfer personal data to individuals, it may transfer the personal data owner's personal data to Foreign Countries Where There Is Adequate Protection or a Data Controller Who Promises Adequate

Protection, in line with legitimate and lawful personal data processing purposes, by showing the necessary care when it is obliged to do so, by taking the necessary security measures and by taking the adequate measures prescribed by the Personal Data Protection Board. • If there is the explicit consent of

the personal data owner, or • If there is no explicit consent of the personal data owner;

– Personal data of a personal nature other than the data subject's health and sexual life (data related to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership to associations, foundations or unions, criminal convictions and security measures, as well as biometric and genetic data), in cases stipulated by law,

– Sensitive personal data regarding the health and sexual life of the personal data owner may only be processed by persons or authorized institutions and organizations under a confidentiality obligation for the purposes of protecting public health, providing preventive medicine, medical diagnosis, treatment and care services, and planning and managing health services and their financing.

4. CATEGORIZATION OF PERSONAL DATA PROCESSED BY OUR COMPANY, PROCESSING PURPOSES AND STORAGE PERIOD

In accordance with Article 10 of the Personal Data Protection Law, our company informs the personal data owner of which personal data owner groups it processes personal data of, the purposes of processing the personal data of the personal data owner, and the retention periods within the scope of the obligation to inform.

4.1. CATEGORIZATION OF PERSONAL DATA

Our Company processes personal data in the following categories, limited to the periods covered by this Policy, based on one or more of the personal data processing conditions specified in Article 5 of the Personal Data Protection Law, and in accordance with our Company's legitimate and lawful personal data processing purposes, by informing the relevant individuals in accordance with Article 10 of the Personal Data Protection Law. We comply with the general principles set forth in the Personal Data Protection Law, particularly the principles set forth in Article 4 of the Personal Data Protection Law, and all obligations set forth in the Personal Data Protection Law. The data subjects to whom the personal data processed in these categories are related under this Policy are also specified in Section 5 of this Policy.

PERSONAL DATA	PERSONAL DATA CATEGORIZATION EXPLANATION
Identity Information	All information contained in documents such as Driver's License, Identity Card, Residence, Passport, Lawyer's ID, Marriage Certificate, which clearly belongs to an identified or identifiable natural person and is processed partially or fully automatically or non-automatically as part of the data recording system.
Contact Information	Information such as telephone number, address, e-mail, which clearly belongs to an identified or identifiable natural person and is processed partially or fully automatically or non-automatically as part of a data recording system.
Location Data	Information that clearly belongs to an identified or identifiable natural person; processed partially or fully automatically, or non-automatically as part of a data recording system; and identifies the location of the personal data owner while using our products and services, or while our employees and employees of institutions we cooperate with are using our Company's vehicles.
Customer or Knowledge operations	Information that clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; information obtained and produced about the relevant person as a result of our commercial activities and the carried out by our business units within the scope of this Guest .

Family Members and Relatives Knowledge	<p>Information about the family members and relatives of the personal data owner, which is clearly related to an identified or identifiable natural person and is included in the data recording system; information regarding the products and services we offer or for the purpose of protecting the legal interests of the Company and the data owner.</p>
Customer Transaction Information	<p>Information that clearly belongs to an identified or identifiable natural person and is included in the data recording system; such as records regarding the use of our products and services and the instructions and requests required for the customer to use the products and services.</p>
Physical Space Security Knowledge	<p>Personal data relating to records and documents taken upon entering the physical location and during the stay in the physical location, which are clearly related to an identified or identifiable natural person and are included in the data recording system.</p>
Transaction Security Information	<p>Your personal data, which clearly belongs to an identified or identifiable natural person and is included in the data recording system, is processed to ensure our technical, administrative, legal and commercial security while carrying out our commercial activities.</p>
Risk Management Information	<p>Personal data that clearly belongs to an identified or identifiable natural person and is included in the data recording system; and can be processed through methods used in accordance with generally accepted legal, commercial practices and the rule of integrity in these areas in order to manage our commercial, technical and administrative risks.</p>
Financial Information	<p>Personal data that clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; processed personal data related to information, documents and records showing all kinds of financial results created according to the type of legal relationship our company has established with the personal data owner.</p>
Personnel Information	<p>Any personal data that clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; processed to obtain information that will form the basis for the establishment of the personal rights of our employees or natural persons who have a working relationship with our Company.</p>

Employee Transaction Information and Employee Candidate Information	<p>Personal data that clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; Personal data processed in relation to any business-related transactions carried out by our employees or natural persons who have a business relationship with our company.</p> <p>Personal data that clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; Personal data processed regarding individuals who have applied to become employees of our Company or who have been evaluated as employee candidates in line with our Company's human resources needs in accordance with business practices and rules of integrity, or who have a working relationship with our Company.</p>
Employee Performance and Career Development Information	<p>Personal data that clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; processed for the purpose of measuring the performance of our employees or natural persons who have a working relationship with our Company and planning and carrying out their career development within the scope of our company's human resources policy.</p>
	<p>Data clearly belonging to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; Data sent to employees or our Company.</p>
Fringe Benefits and Benefits Knowledge	<p>Your personal data processed for the planning of the fringe benefits and interests we offer and will offer to other natural persons with whom we are in a working relationship, the determination of objective criteria for entitlement to these and the monitoring of entitlements to these.</p>
Legal Process and Compliance Knowledge	<p>Your personal data, which clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; processed within the scope of determining and pursuing our legal receivables and rights, fulfilling our debts, and complying with our legal obligations and our company's policies.</p>
Audit and Inspection Information	<p>Your personal data, which clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; processed within the scope of our Company's legal obligations and compliance with company policies.</p>
Special Personal Data	<p>Data that clearly belong to an identified or identifiable natural person and are processed partially or fully automatically or non-automatically as part of a data recording system; as specified in Article 6 of Law No. 6698.</p>

Marketing Knowledge	Personal data that clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of a data recording system; processed for the marketing of our products and services by customizing them in line with the usage habits, tastes and needs of the personal data owner, and the reports and evaluations created as a result of this processing.
Request/Complaint Management Knowledge	Personal data that clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of the data recording system; related to the receipt and evaluation of any requests or complaints directed to our Company.

4.2. PURPOSES OF PROCESSING PERSONAL DATA

According to the categorization prepared by our Company, the main purposes for processing personal data are shared below:

- Carrying out the necessary work by our relevant business units and carrying out the related business processes in order to carry out the commercial activities carried out by our company,
- Planning and execution of our Company's commercial and/or business strategies, • Necessary to benefit the relevant people from the products and services offered by our Company.
 - Carrying out the work by our business units and carrying out the relevant processes, • Planning and executing our company's human resources policies and processes, • Ensuring the legal, technical and commercial occupational safety of the relevant persons who have a business relationship with our company. supply.
- Compliance with laws and legal requirements

The data processing purposes within the scope of the above-mentioned purposes are as follows:

- Analysis and planning of processes in public and private tenders • Exploration and market research within the scope of project evaluation in tenders • Planning and Execution of Corporate Communication Activities
 - Planning and Execution of Information Security Processes
 - Creating and Managing Information Technologies Infrastructure Planning and
 - Execution of Business Partners and/or Suppliers' Access Authorizations to Information and Facilities
- Planning and Execution of Side Rights and Benefits for Supplier and/or Business Partner Employees • Monitoring of Finance and/or Accounting Affairs Management of
 - Relations with Business Partners and/or Suppliers • Planning and Execution of Sales Processes of Products and/or Services • Carrying out Activities to Determine Financial Risks of Customers • Monitoring of Contract Processes and/or Legal Requests • Monitoring of Customer Requests and/or Complaints • Planning of Human Resources Processes • Carrying out of Personnel Procurement Processes • Planning and Execution of Market Research Activities for Sales and Marketing of Products and Services
 - Execution
- Legal Payroll Process • Planning and Execution of Marketing Processes of Products and/or Services • Following up on Legal Affairs • Carrying out Company Activities in Accordance with Company Procedures and/or Relevant Legislation Planning and Execution of Operational Activities Necessary for Procurement
 - Collecting Entry and Exit Records of Business Partner/Supplier Employees
- Creating and Monitoring Visitor Records • Planning and Execution of Company Audit Activities • Planning and/or Execution of
 - Occupational Health and/or Safety Processes • Management and/or Audit of Relations with Subsidiaries • Ensuring the Security of Company Assets and/or Resources • Planning and/or Execution of Company Financial Risk Processes

For personal data processing purposes other than those specified above, our Company seeks the explicit consent of personal data owners. The following personal data processing activities are carried out by the relevant business units in accordance with the aforementioned explicit consent of personal data owners. In this context, if the conditions specified above are not met, the personal data processing purposes for which the explicit consent of personal data owners is sought are as follows:

- Planning and Execution of Access Authorizations for Business Partners and/or Suppliers to Information and
- Facilities Management of Relationships with Business Partners and/
or Suppliers • Planning and Execution of Sales Processes for Products and/or
Services • Planning and Execution of Customer Relationship Management
Processes • Planning and Execution of Market Research Activities for Sales and Marketing of Products and Services
- Processes for Creating and/or Increasing Loyalty to the Products and/or Services Offered by the Company
Planning and/or Execution •
Planning and Execution of Marketing Processes of Products and/or Services • Carrying
out Company Activities in Accordance with Company Procedures and/or Relevant Legislation
Planning and Execution of Operational Activities Necessary for Procurement •
- Collection of Entry and Exit Records of Business Partner/Supplier Employees •
Planning and Execution of Company Audit Activities
- Ensuring the Security of Company Campuses and/or Facilities.

4.3. STORAGE PERIOD OF PERSONAL DATA

Our company stores personal data for the period specified in relevant laws and regulations, if stipulated in these regulations.

If legislation does not specify how long personal data must be stored, personal data will be processed for the period required by our Company's practices and business practices, depending on the services our Company offers while processing that data, and will then be deleted, destroyed, or anonymized. Detailed information on this matter is provided in Section 9 of this Policy.

If the purpose of processing personal data has expired, and the retention periods specified by relevant legislation and the company have expired, personal data may be retained solely as evidence in potential legal disputes or to assert or defend rights related to personal data. Retention periods are determined based on the statute of limitations for asserting the aforementioned rights and examples of previous requests submitted to our Company regarding the same matters despite the expiration of the statute of limitations.

In this case, stored personal data is not accessed for any other purpose and is only accessed when it is necessary to resolve a legal dispute. Once the aforementioned period has expired, personal data is deleted, destroyed, or anonymized.

5. CATEGORIZATION OF THE OWNERS OF PERSONAL DATA PROCESSED BY OUR COMPANY

Although our company processes the personal data of the personal data owner categories listed below, the scope of application of this Policy is limited to our customers, potential customers, employee candidates, company shareholders, company officials, visitors, employees, shareholders and officials of the institutions we cooperate with, and third parties.

Our employees' activities regarding the protection and processing of personal data will be evaluated under our company's Personal Data Protection and Processing Policy.

While the categories of persons whose personal data are processed by our Company are within the scope specified above, persons outside these categories may also direct their requests to our Company within the scope of the Personal Data Protection Law; their requests will also be evaluated within the scope of this Policy.

The concepts of customer, potential customer, visitor, employee candidate, shareholder, board member, real persons in the institutions we cooperate with and third parties related to these persons within the scope of this Policy are clarified below.

Personal Data Category	Legal
Customer	entities that use or have used the products and services offered by our Company, regardless of whether they have any contractual relationship with our Company; Legal entities that have requested
Potential Customer	or expressed interest in using our products and services, or that may have such interest, as assessed in accordance with commercial customs and rules of integrity; Natural persons or legal entities that
Visitor	have entered the physical premises of our Company for various purposes or visited our websites; Third-party natural persons related to these persons in order
Third Party	to ensure the security of commercial transactions between our Company and the above-mentioned parties or to protect the rights of the aforementioned persons and to obtain benefits (e.g., Guarantor, Companion, Family Members and Relatives) or other natural persons not covered by this policy and our Company's Employees Personal Data Protection and Processing Policy; Natural persons who have applied for a job with our Company through any means
Employee Candidate	or who have made their CV and related information available for review by our Company.
Company Shareholder	Our company's shareholders are real persons and legal entities.
Company Official	Members of our company's board of directors and other authorized real persons
In Collaboration Employees, Shareholders and Officials of the Institutions We Own	Natural persons working in institutions with which our company has any kind of business relationship (such as, but not limited to, business partners, suppliers), including shareholders and officials of these institutions.

The table below details the above-mentioned categories of personal data owners and the types of personal data processed for those within these categories.

PERSONAL CATEGORIZATION	PERSONAL DATA RELATED TO DATA OWNER CATEGORY	RELATED IS
Identity Information	Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Officials, Visitors, Employees of Institutions We Collaborate With, Shareholders and Officers, Third Parties	
Contact Information	Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Officials, Visitors, Employees of Institutions We Collaborate With, Shareholders and Officers, Third Parties	
Location Data	Customers, Employees, Employees of Institutions We Collaborate With	

Customer Information	Customer
Family Members and Relatives Information	Customer, Visitor, Employee Candidate, Third Party, In Collaboration Employees, Shareholders and Officials of the Institutions We Own
Customer Transaction Information	Customer
Physical Space Security	Visitors, Company Officials, Employees, Shareholders and Officials of Institutions We Collaborate With
Information Transaction Security Information	Customer, Visitor, Third Party, Company Officials, In Collaboration Employees, Shareholders and Officials of the Institutions We Own
Risk Management Information	Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Officials, Visitors, Employees of Institutions We Collaborate With, Shareholders and Officers, Third Parties
Financial Information	Customer, Employee, Company Shareholder, Company Official, Company Shareholders, Employees, Shareholders and Institutions We Collaborate With Authorities
Personnel Information	Employees, Shareholders and Institutions We Collaborate With Authorities
Employee Candidate Information	Employee Candidate, Employees of Institutions We Collaborate with Employees of Institutions
Employee Transaction Information	We Collaborate with Employees of Institutions We Collaborate with
Employee Performance And Career Development Information	
Fringe Benefits and Benefits Knowledge	Employees of Institutions We Collaborate With
Legal Process and Compliance Knowledge	Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Officials, Visitors, Employees of Institutions We Collaborate With, Shareholders and Officers, Third Parties
Audit and Inspection Information	Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Officials, Visitors, Employees of Institutions We Collaborate With, Shareholders and Officers, Third Parties
Special Personal Data	Customer, Employee Candidate, Company Shareholder, Company Official, In Collaboration Employees, Shareholders and Officials of the Institutions We Own
Marketing Knowledge	Customer, Potential Customer
Request/Complaint Management Knowledge	Customer, Potential Customer, Employee Candidate, Company Shareholder, Company Officials, Visitors, Employees of Institutions We Collaborate With, Shareholders and Officers, Third Parties

6. THIRD PARTIES TO WHICH PERSONAL DATA IS TRANSFERRED BY OUR COMPANY AND THE PURPOSES OF TRANSFER

Our company notifies the personal data owner about the groups of individuals to whom personal data is transferred in accordance with Article 10 of the Personal Data Protection Law.

In accordance with Articles 8 and 9 of the Personal Data Protection Law (See Section 3/Heading 3.5), our company may transfer customers' personal data to the following categories of persons:

- (i) To our Company's business
- (ii) partners, our Company's suppliers,
- (iii) our Company's affiliates, our
- (iv) Company's shareholders,

- (v) Legally authorized public institutions and organizations, (vi) Legally authorized private law persons.

The scope of the above-mentioned persons to whom data is transferred and the purposes of data transfer are stated below.

Data Transfer	Definition	Purpose of Data Transfer
Contacts to do		
Business Partner	This term refers to the parties with whom our Company establishes business partnerships for purposes such as the sale, promotion, and marketing of our products and services, post-sales support, and the implementation of joint customer loyalty programs while conducting our Company's commercial activities. It refers	Only within the scope of transactions that impose legal requirements, limited to ensuring the fulfillment of the purposes for establishing the business partnership, limited to the extent of legal requirements, such as limited to the relevant banks for collection transactions, limited to ensuring the provision of services
Supplier	to the parties who provide services to our Company on a contractual basis in accordance with our Company's orders and instructions while conducting our Company's commercial activities.	to our Company that our Company outsources from suppliers and is necessary for the fulfillment of our Company's commercial activities. Limited to ensuring the execution of commercial activities that require the participation of our Company's affiliates
Our subsidiaries	with the company in which our Company is a shareholder, limited to the design of strategies and audit strategies related to our Company's commercial activities in accordance with the provisions	
Our shareholders	of relevant legislation, limited to the design of administrative activities, limited to the Company's shareholders who are authorized to do so.	
Legally Authorized Public Institution and Organizations	Public institutions and organizations authorized to receive information and documents from our Company in accordance with the relevant	Limited to the purpose requested by the relevant public institutions and organizations within their legal authority.
Legally Authorized Special Legal Persons	legislation. Private law entities authorized to receive information and documents from our Company in accordance with the relevant legislation.	Limited to the purpose requested by the relevant private legal persons within their legal authority.

In the transfers made by our Company, we act in accordance with the matters regulated in Sections 2 and 3 of the Policy.

7. PROCESSING OF PERSONAL DATA BASED ON AND LIMITED TO THE PROCESSING CONDITIONS STATED IN THE LAW

Our company informs personal data owners about the personal data it processes in accordance with Article 10 of the Personal Data Protection Law.

7.1. PROCESSING OF PERSONAL DATA AND SPECIAL NATURE PERSONAL DATA

7.1.1. Processing of Personal Data

The data subject's explicit consent is only one of the legal bases that enables the lawful processing of personal data. In addition to explicit consent, personal data may also be processed if one of the other conditions listed below is met. The basis for processing personal data is as follows:

While only one of the conditions specified may be the basis for the same personal data processing activity, more than one of these conditions may be the basis. If the processed data is special personal data, the conditions set forth in Section 7.1.2 below apply.

Although the legal bases for the processing of personal data by our company vary, all personal data processing activities are carried out in accordance with the general principles set out in Article 4 of Law No. 6698 (See Section 3.1.).

A - Explicit Consent of the Personal Data Owner: One of the conditions for processing personal data is the owner's explicit consent. Explicit consent must be specific, informed, and freely given.

Personal data processing activities (secondary processing) other than the processing purpose for which personal data is obtained (primary processing) are subject to at least one of the conditions set out in (ii), (iii), (iv), (v), (vi) and (vii) of this heading; if one of these conditions is not present, our Company carries out these personal data processing activities based on the explicit consent of the personal data owner for these processing activities.

In order for personal data to be processed based on the explicit consent of the personal data owner, explicit consent is obtained from suppliers, potential customers, clients and visitors through relevant methods.

B - If it is clearly provided for in the law , the personal data of the data owner may be processed in accordance with the law if it is clearly provided for in the law.

C - Inability to Obtain Explicit Consent of the Data Subject Due to Actual Impossibility If the processing of personal data is necessary to protect the life or physical integrity of the person or another person who is unable to express his consent due to actual impossibility or whose consent cannot be validated, the personal data of the data subject may be processed.

Example: A visitor who fainted had his blood type information given to the doctors by his friends.
to be given.

D - Directly Related to the Establishment or Execution of a Contract: Processing of personal data is possible if it is necessary to process personal data of the parties to the contract, provided that it is directly related to the establishment or execution of a contract.

Example: Collection of employee information to fulfill legal obligations under the Labor Law

E - Fulfillment of Legal Obligations of the Company If processing is necessary for our company to fulfill its legal obligations as the data controller, the personal data of the data owner may be processed.

Example: Submitting information requested by court order to the court.

F- Personal Data Owner's Making His/Her Personal Data Public If the data owner has made his/her personal data public, the relevant personal data can be processed.

For example, if someone states on a website that they want to buy a car with certain features and enters their phone number, their data can now be processed without their explicit consent, but only to a limited extent. This means that anyone looking to sell a car with these features can contact them without needing any consent.

G - Data Processing is Necessary for the Establishment or Protection of a Right If

data processing is necessary for the establishment, exercise or protection of a right, the personal data of the data owner may be processed.

Example: Storing evidentiary data (sales contract, invoice) and when necessary use.

H - Data Processing is Necessary for the Legitimate Interest of Our Company:

Personal data of the data owner may be processed if data processing is necessary for the legitimate interests of our Company, provided that it does not harm the fundamental rights and freedoms of the personal data owner.

Example: Processing of personal data by accounting for the purpose of making internal calculations.

7.1.2. Processing of Special Personal Data

Our company processes special personal data in the following cases, unless the data owner gives explicit consent, provided that adequate measures are taken, as determined by the Personal Data Protection Board:

- (i) Special personal data, other than the health and sexual life of the personal data owner, may be disclosed in cases
- (ii) prescribed by law. Special personal data regarding the health and sexual life of the personal data owner may only be disclosed by persons or authorized institutions and organizations under a confidentiality obligation for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and planning and managing health services and their financing.

8. PERSONAL DATA PROCESSING ACTIVITIES CONDUCTED AT BUILDINGS, FACILITY ENTRANCES, WITHIN BUILDINGS, AND WEBSITE VISITORS

Personal data processing activities carried out by our company at building facility entrances and within the facility are carried out in accordance with the Constitution, the Personal Data Protection Law and other relevant legislation.

In order to ensure security, our Company carries out personal data processing activities in order to monitor guest entries and exits through security cameras in our Company buildings and facilities.

Our Company carries out personal data processing activities by using security cameras and recording guest entries and exits.

In this context, our Company acts in accordance with the Personal Data Protection Law and other relevant legislation.
is continuing.

8.1. MONITORING ACTIVITIES WITH CAMERA CONDUCTED AT THE ENTRANCES AND INSIDE THE BUILDING AND FACILITY

In this section, explanations will be made regarding our Company's camera monitoring system and information will be provided on how personal data, privacy and fundamental rights of the individual are protected.

Our company's purpose within the scope of security camera monitoring activities is to improve the quality of the service provided, to ensure its reliability, to ensure the safety of the company, visitors, employees and other persons, and to protect its legitimate interests.

8.1.1. Legal Basis for Camera Surveillance

The camera monitoring activity carried out by our company is carried out in accordance with the Law on Private Security Services and relevant legislation.

8.1.2. Conducting Surveillance Activities with Security Cameras in Accordance with Personal Data Protection Law

Our company complies with the regulations in the Personal Data Protection Law when conducting camera surveillance activities for security purposes.

Our company carries out security camera monitoring activities in order to ensure the security of its buildings and facilities, for the purposes stipulated in the law and in accordance with the personal data processing conditions listed in the Personal Data Protection Law.

8.1.3. Announcement of Camera Surveillance Activities

Our company has implemented the following procedures in accordance with Article 10 of the Personal Data Protection Law:

In accordance with the article, personal data owner
It is illuminated.

In addition to the general information provided (See Section 3/Heading 3.3) regarding general matters, our company also provides notifications regarding camera surveillance activities using multiple methods, in accordance with the regulations in the EU and within the scope of the GDPR.

In this way, it is aimed to prevent harm to the fundamental rights and freedoms of the personal data owner and to ensure transparency and enlightenment of the personal data owner.

Regarding the camera surveillance activity carried out by our Company, this Policy is published on our Company's website (online policy regulation) and a notice stating that surveillance will be carried out is posted at the entrances of the areas where surveillance is carried out (on-site lighting).

8.1.4. Purpose of Camera Monitoring and Limitation to the Purpose

In accordance with Article 4 of the Personal Data Protection Law, our company processes personal data in a limited and proportionate manner, in connection with the purposes for which they are processed.

Our Company's purpose in conducting video camera surveillance is limited to the purposes listed in this Policy. Accordingly, the monitoring areas, number of security cameras, and the timing of monitoring are limited to and sufficient to achieve security objectives. Areas where privacy might be violated beyond security objectives (e.g., restrooms) are not subject to monitoring.

8.1.5. Ensuring the Security of the Obtained Data

In accordance with Article 12 of the Personal Data Protection Law, our company takes the necessary technical and administrative measures to ensure the security of personal data obtained through camera surveillance. (See Section 2/Heading 2.1)

8.1.6. Storage Period of Personal Data Obtained through Camera Surveillance

Detailed information regarding the retention period of personal data obtained through camera surveillance by our Company is included in Article 4.3 of this Policy, titled "Personal Data Retention Periods."

8.1.7. Who Can Access the Information Obtained as a Result of Monitoring and To Whom This Information Is Transferred

Only a limited number of company employees have access to digitally recorded and maintained records, subject to management approval and in exceptional circumstances. Live camera footage, however, can be monitored by security personnel. A limited number of individuals with access to these records sign a confidentiality agreement, pledging to maintain the confidentiality of the data they access.

8.2. MONITORING OF GUEST ENTRANCES AND EXITS AT AND WITHIN BUILDINGS AND FACILITIES

Personal data owners are informed of this information through text posted on the company premises or otherwise made accessible to visitors. Visitors' entry and exit information is processed solely for security purposes, and relevant personal data is physically recorded in the data recording system.

8.3. STORAGE OF RECORDS REGARDING INTERNET ACCESS PROVIDED TO OUR VISITORS AND GUESTS IN OUR BUILDINGS AND FACILITIES

To ensure security and for the purposes outlined in this Policy, our Company may provide internet access to Visitors who request it during their stay in our Building. In this case, log records related to your internet access are recorded in accordance with Law No. 5651 and the legislation issued pursuant to this Law; these records are processed only upon request by authorized public institutions and organizations or to fulfill our legal obligations during internal audits.

Only a limited number of our company employees and the IT department at our headquarters have access to the logs obtained within this framework. Company employees with access to these records do so only for the purposes of requests from authorized public institutions and organizations or for auditing purposes, and they share them with legally authorized individuals. The limited number of individuals with access to these records declare, through a confidentiality agreement, that they will maintain the confidentiality of the data they access.

8.4. WEBSITE VISITORS

Our company does not record internet movements through technical means on its website, although it does not record the internet movements of its visitors on its website, but rather ensures that they visit the website in accordance with their purpose of visiting, to display customized content to them, and to engage in online advertising activities.

CHAPTER 9 – CONDITIONS FOR DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

Although our Company has processed personal data in accordance with the relevant legal provisions as regulated in Article 138 of the Turkish Penal Code and Article 7 of the Personal Data Protection Law, personal data is deleted, destroyed or anonymized based on our Company's own decision or upon the request of the personal data owner, if the reasons requiring processing are eliminated.

9.1. OBLIGATION TO DELETE, DESTROY AND ANONYMIZE PERSONAL DATA

As regulated in Article 138 of the Turkish Penal Code and Article 7 of the Personal Data Protection Law, personal data may be deleted, destroyed, or anonymized at our Company's discretion or upon the request of the data subject, even if processed in accordance with relevant legal provisions, if the reasons requiring processing no longer exist. In this context, our Company fulfills its obligations through the methods described in this section.

9.2. TECHNIQUES FOR DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

9.2.1. Techniques for Deleting and Destroying Personal Data: Our

Company may delete or destroy personal data, even if it has been processed in accordance with the relevant legal provisions, at its own discretion or upon the request of the personal data owner, if the reasons requiring processing no longer exist. The most commonly used deletion or destruction techniques by our Company are listed below:

(i) Physical Destruction

Personal data may also be processed non-automatically, provided it is part of a data recording system. When such data is deleted/destroyed, a system is implemented to physically destroy the personal data so that it cannot be used later.

(ii) Secure Deletion Software

When deleting/destroying data that is processed by fully or partially automatic means and stored in digital environments, methods are used to delete the data from the relevant software in a way that it cannot be recovered again.

(iii) Sending to a Specialist for Secure Deletion

In some cases, our company may contract with an expert to delete personal data on its behalf. In this case, personal data is securely deleted/destroyed by a person who is an expert in this field in a way that cannot be recovered again.

9.2.2. Techniques for Anonymizing Personal Data

Anonymizing personal data refers to rendering personal data incapable of being linked to an identified or identifiable natural person, even when matched with other data. Our company may anonymize personal data when the reasons requiring processing of legally processed personal data no longer exist.

In accordance with Article 28 of the Personal Data Protection Law, anonymized personal data may be processed for purposes such as research, planning, and statistics. Such processing falls outside the scope of the Personal Data Protection Law, and the explicit consent of the data subject will not be required. Because anonymized and processed personal data falls outside the scope of the Personal Data Protection Law, the rights set forth in Section 10 of the Policy will not apply to this data.

The anonymization techniques most commonly used by our company are listed below:

(i) **Masking**

Data masking is a method of anonymizing personal data by removing the basic identifying information of personal data from the data set.

Example: Transforming the personal data into a data set that makes it impossible to identify the personal data owner by removing information such as name, TR ID Number, etc. that enable the identification of the personal data owner.

(ii) **Aggregation**

With the data aggregation method, many data are aggregated and personal data is made unrelated to any person.

Example: Revealing that there are Z employees of X age without showing the ages of the employees one by one.

(iii) **Data Derivation**

With the data generation method, a more general content is created from the content of personal data and personal data is made unrelated to any person.

Example: Indicating ages instead of dates of birth; indicating the region of residence instead of the full address.

(iv) **Data Shuffle (Data Shuffling, Permutation)**

Data hashing method is used to break the connection between values and individuals by mixing the values in the personal data set.

Example: Changing the quality of voice recordings so that they cannot be associated with the data owner.

10. RIGHTS OF PERSONAL DATA SUBJECTS; METHODOLOGY OF EXERCISE AND EVALUATION OF THESE RIGHTS

Our Company informs personal data owners of their rights in accordance with Article 10 of the Personal Data Protection Law, guides personal data owners on how to exercise these rights, and carries out the necessary channels, internal operations, administrative and technical arrangements in accordance with Article 13 of the Personal Data Protection Law to assess the rights of personal data owners and provide the necessary information to personal data owners.

10.1 DATA OWNER'S RIGHTS AND EXERCISE OF THESE RIGHTS

10.1.1. Rights of Personal Data Owners

Personal data owners have the following rights:

- (1) Learning whether personal data is being processed,
- (2) To request information regarding the processing of personal data,
- (3) To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- (4) Knowing the third parties to whom personal data is transferred, either domestically or abroad, (5)
To request correction of personal data if it is processed incompletely or incorrectly and to request that the action taken in this context be notified to third parties to whom personal data has been transferred,
- (6) To request the deletion or destruction of personal data in case the reasons requiring processing are eliminated, even though they have been processed in accordance with the provisions of the Personal Data Protection Law and other relevant laws, and to request that the process carried out within this scope be notified to third parties to whom personal data has been transferred, (7)
To object to the emergence of a result to the detriment of the person himself/herself by analyzing the processed data exclusively through automated systems, To request compensation for the damages
- (8) in case of damages due to the unlawful processing of personal data.

10.1.2. Cases in which the Personal Data Owner cannot assert his rights

Since the following situations are excluded from the scope of the Personal Data Protection Law in accordance with Article 28 of the Personal Data Protection Law, personal data owners cannot assert their rights listed in Article 10.1.1. regarding these matters:

- (1) Processing of personal data for purposes such as research, planning and statistics by making them anonymous through official statistics.
- (2) Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defence, national security, public safety, public order, economic security, privacy of private life or personal rights or does not constitute a crime.
- (3) Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public safety, public order or economic security.
- (4) Processing of personal data by judicial authorities or enforcement authorities in connection with investigation, prosecution, trial or execution proceedings.

In accordance with Article 28/2 of the Personal Data Protection Law, personal data owners cannot assert their other rights listed in 10.1.1., except for the right to demand compensation for damages, in the following cases:

- (1) Personal data processing is necessary for the prevention of crime or for the investigation of crime.
to be.
- (2) Processing of personal data made public by the personal data owner.
- (3) Processing of personal data is necessary for the performance of supervisory or regulatory duties or disciplinary investigation or prosecution by authorized public institutions and organizations and professional organizations with the status of public institutions, based on the authority granted by law.
- (4) Processing of personal data is necessary to protect the economic and financial interests of the State in relation to budgetary, tax and financial matters.

10.1.3. Exercise of Personal Data Owner's Rights

Personal data owners may submit their requests regarding their rights listed under heading 10.1.1 of this section to our Company free of charge, using the method specified below:

1 - A petition stating their demands clearly or they can obtain it from our company or our website.
Fill out the KVKK Application Form and send it with a wet signature via Registered Mail or Notary.

For OUR COMPANY;

PD THREE REAL ESTATE INVESTMENT LIMITED COMPANY

15 July Neighborhood Prof. Dr. Necmettin Erbakan Street Primemall Shopping Mall No: 71 D: 33,
27560 İhkitkamil/Gaziantep

2 - By filling out the KVKK Application Form, which they can obtain from our company or our official website, where their requests are clearly stated, and after signing with your "secure electronic signature" within the scope of Electronic Signature Law No. 5070 , by sending the secure electronically signed form to kvkk@pd-global.com . _____

3 – By filling out the KVKK Application Form and personally applying to the facility where the service is received, with a wet-ink signature, at the address where the service is received.

It is not possible for third parties to make requests on behalf of personal data owners.

In order for a person other than the personal data owner to make a request, there must be a special power of attorney issued by the personal data owner on behalf of the person who will make the application.

In the application to exercise their rights, personal data owners will use only the above 2 methods to be made by the Relevant Person (Personal Data Owner) to the Data Controller in accordance with the "Personal Data Protection Law No. 6698" linked above.

10.1.4. Personal Data Owner's Right to Complain to the Personal Data Protection Board

In accordance with Article 14 of the Personal Data Protection Law, if the application is rejected, the response is found insufficient or the application is not responded to in a timely manner, the personal data owner may file a complaint with the Personal Data Protection Board within thirty days from the date on which he/she learns of our Company's response and, in any case, within sixty days from the date of application.

10.2. RESPONDING TO APPLICATIONS WITHIN THE SCOPE OF KVKK AND GDPR

10.2.1. Our Company's Procedure and Timeframe for Responding to Applications

If the personal data owner submits his/her request to our Company in accordance with the procedure in section 10.1.3 of this section, our Company will finalize the relevant request free of charge as soon as possible and within thirty days at the latest, depending on the nature of the request.

However, if the process requires an additional cost, our Company will charge the applicant the fee specified in the tariff determined by the Personal Data Protection Board. 10.2.2. Our Company's Personal Data

Information that may be requested from the owner: Our company may request information from the relevant person in order to determine whether the applicant is the owner of personal data.

Our company may ask questions to the personal data owner regarding their application in order to clarify the issues included in the personal data owner's application.

10.2.3. Our Company's Right to Reject the Application of the Personal Data Owner

Our company may reject the applicant's application by explaining the reason in the following cases:

- (1) Personal data is anonymized with official statistics for research, planning and statistics.
Processing for such purposes.
- (2) Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defence, national security, public safety, public order, economic security, privacy of private life or personal rights or does not constitute a crime.
- (3) Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public safety, public order or economic security.
- (4) Judicial processing of personal data regarding investigation, prosecution, trial or execution processes.
processed by authorities or enforcement authorities.
- (5) Processing of personal data is necessary for the prevention of crime or criminal investigation.
- (6) Processing of personal data made public by the personal data owner.
- (7) Processing of personal data is necessary for the performance of supervisory or regulatory duties or disciplinary investigation or prosecution by authorized public institutions and organizations and professional organizations with the status of public institutions, based on the authority granted by law.
- (8) Processing of personal data is necessary to protect the economic and financial interests of the State in relation to budgetary, tax and financial matters.
- (9) The request of the personal data owner may hinder the rights and freedoms of other persons (10)
Requests have been made that require disproportionate effort.
- (11) The requested information is publicly available information.

11. RELATIONSHIP BETWEEN THE COMPANY'S PERSONAL DATA PROTECTION AND PROCESSING POLICY AND OTHER POLICIES

The Company's fundamental policies regarding the protection and processing of personal data, which are related to the principles set forth in this Policy, are set out below. These policies are linked to the Company's fundamental policies in other areas, ensuring harmonization between processes operated by the Company with different policy principles for similar purposes. Some of the policies used within our Company are intended for internal use. The principles of the Company's internal policies are reflected in publicly available policies, to the extent relevant, to inform relevant parties accordingly and to ensure transparency and accountability regarding the Company's personal data processing activities.

12. COMPANY PERSONAL DATA PROTECTION AND PROCESSING POLICY GOVERNANCE STRUCTURE

Our company has established a governance structure to ensure compliance with the regulations of the Personal Data Protection Law and to ensure the enforcement of the Personal Data Protection and Processing Policy.

A "Personal Data Protection Committee" has been established within the Company pursuant to a decision by the Company's senior management to manage this policy and other related and affiliated policies (See Section 11). The duties of this committee are outlined below.

- To prepare basic policies regarding the Protection and Processing of Personal Data and submit them to the approval of the senior management in order to put them into effect.
- To decide how the policies regarding the Protection and Processing of Personal Data will be implemented and audited, and to submit the matters of assigning internal tasks and ensuring coordination within this framework to the approval of the senior management.
- To determine the matters that need to be done to ensure compliance with the Personal Data Protection Law and relevant legislation and to submit the necessary actions to the approval of the senior management; to oversee their implementation and to ensure coordination.
- To raise awareness within the Company and among the institutions with which the Company cooperates regarding the Protection and Processing of Personal Data. To identify risks that may arise in the Company's
- personal data processing activities and ensure that the necessary measures are taken; to submit improvement suggestions for approval by senior management.
- To design and ensure the execution of training on the protection of personal data and the implementation of policies.
- To decide on the applications of personal data owners at the highest level.
- To coordinate the execution of information and training activities to ensure that personal data owners are informed about personal data processing activities and their legal rights.
- To prepare changes to the basic policies regarding the Protection and Processing of Personal Data and submit them to the approval of the senior management in order to put them into effect.
- To follow the developments and regulations regarding the Protection of Personal Data; to make recommendations to the senior management on what needs to be done within the Company in accordance with these developments and regulations.
- Coordinating relations with the Personal Data Protection Board and Institution. • Performing other duties

assigned by the company's senior management regarding the protection of personal data.

ANNEX-1 DEFINITIONS

Explicit Consent: Consent based on informed consent and expressed freely regarding a specific matter . **Anonymization:** The irreversible modification of personal data, such that it loses its personal data status. For example, rendering personal data incapable of being associated with a natural person through techniques such as masking, aggregation, data corruption, etc. **Candidate Employees:** Natural persons who have applied for a job with our company through any means or who have made their CVs and related information available for review by our company. Employees of institutions with which we collaborate.

Shareholders and Authorities: Natural persons working in institutions with which our Company has any kind of business relations (such as, but not limited to, business partners, suppliers), including shareholders and authorities of these institutions. **Processing of Personal Data:** Any operation performed on data such as

obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data, wholly or partially by automatic means or non-automatic means provided that it is part of any data recording system.

Personal Data Owner: The natural person whose personal data is processed. For example, customers and employees. Personal Data Any information relating to an identified or identifiable natural person. Therefore, the processing of information relating to legal entities is not within the scope of the Law. For example, name-surname, TR ID No., e-mail, address, date of birth, credit card number, etc.

Visitors: These are natural or legal persons who use or have used the products and services offered by our Company, regardless of whether they have any contractual relationship with our Company. **Sensitive Personal Data:** Data related to race,

ethnicity, political views, philosophical beliefs, religion, sect or other beliefs, dress code, membership in associations, foundations or unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data, are considered sensitive data.

Potential Customer: Real persons who have requested or shown interest in using our products and services or who have been assessed in accordance with commercial practices and rules of integrity to be likely to have such interest.

Company Shareholder: Real persons who are shareholders of our company.

Company Official: Member of the board of directors of our company and other authorized real

persons. **Third Party:** Third party real persons who are related to these persons in order to ensure the security of commercial transactions between our company and the above-mentioned parties or to protect the rights of the above-mentioned persons and to provide benefits (e.g. Guarantor, Companion, Family Members and relatives).

Data Processor: A natural or legal person who processes personal data on behalf of the data controller based on the authority granted by the data controller. For example, a cloud computing company that holds your company's data.

Data Controller: The data controller is the person who determines the purposes and means of processing personal data and manages the place where data is systematically kept (data recording system).

Visitor: A natural person who has entered the physical premises of our company for various purposes or visited our websites.

ANNEX-2 IMPORTANT DATES FOR THE IMPLEMENTATION OF THE KVK LAW

As of April 7, 2016,	our Company complies with the following obligations: moves: (i) General rules and principles regarding the processing of personal data (ii) Obligations regarding the disclosure of personal data owners (iii) Obligations regarding ensuring data security
As of October 7, 2016,	the regulations listed below came into force. and our Company acts in accordance with these regulations: - Provisions regarding the transfer of personal data to third parties and abroad - The personal data owner, who is the owner of the personal data, can apply to our Company. Regulations regarding exercising their rights against personal data (learning whether their personal data has been processed, requesting information, learning about the persons to whom it has been transferred, requesting correction) and making a complaint to the Personal Data Protection Board.
April 7, 2017	Consent obtained in accordance with law before April 7, 2016 As of April, no declaration to the contrary has been made by the personal data owner. If it is not found, it will be deemed to be in compliance with the Personal Data Protection Law.

	(vii) As of April 7, 2017, the Regulations regarding the Personal Data Protection Law will come into force and our Company will act in accordance with these regulations.
7 April 2018	Personal data processed before 7 April 2016 will be brought into compliance with the Personal Data Protection Law by our Company, or will be deleted or anonymized by 7 April 2018.

ANNEX-3 PROCESSING OF PERSONAL DATA OF EMPLOYEE CANDIDATES AND BUSINESS PARTNERS' EMPLOYEES

PERSONAL DATA OWNER	COLLECTION AND PROCESSING OF PERSONAL DATA	YOUR RIGHTS USING AND APPLICATION
Worker Candidates	<p>Personal data of the candidate employees collected during the recruitment process) Special personal data of the candidate employees collected according to the nature of the job etc. are processed by our company for the purposes listed below and for the rights arising from the 4th and 2nd sections of the Policy: • To evaluate the candidate's qualifications, experience and interest in the open position. • To evaluate the suitability of the candidate for our Company,</p> <ul style="list-style-type: none"> • If necessary, to check the accuracy of the information provided by the candidate or to contact third parties and conduct research about the candidate, • To contact candidates regarding the application and recruitment process or, if appropriate, to contact candidates regarding any subsequent openings, either domestically or internationally; to meet the requirements of relevant legislation • or the requests of authorized institutions or organizations; and to develop and improve the recruitment • policies implemented by our Company. Personal data of prospective employees may be collected through the following methods and means: • Digital application form published in written or electronic media; • CVs sent by candidates to our company via e-mail, cargo, references and similar methods, • Employment or consultancy companies; • During the interview, in cases where interviews are conducted via video conference, telephone or face-to-face, • Checks made to verify the accuracy of the information submitted by the candidate and research conducted by our company, 	<p>In the section can be transmitted using the method described above.</p>

	<ul style="list-style-type: none">• Recruitment tests that identify talents and personality traits, conducted by experienced experts and whose results are examined.	
<div>Work</div> <div>Employees of Partners</div>	<p>Our company, within the scope of carrying out commercial activities with its business partners, processes personal data of the employees of the business partners as stated in Section 4.2 and Section 7 of the Policy. It can operate within the purposes explained in the section.</p>	<p>Job candidates may submit their requests regarding their rights arising from their data ownership to our Company using the method described in Section 10 of this Policy.</p>