

KoçSistem

Personal Data Protection Policy

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1. PURPOSE AND SCOPE

This KoçSistem Personal Data Protection Policy ("Policy"), which is a part of the Koç Group and KoçSistem Ethical Principles, aims to determine the framework and coordinate the compliance activities to be carried out specifically for KoçSistem in order to comply with the Legislation on the protection and processing of personal data. In this context, the aim is to ensure that personal data processing activities are carried out in accordance with the principles of compliance with the law, honesty and transparency.

The employees and executives of KoçSistem are obliged to act in accordance with this Policy. Business Partners are also expected to act in accordance with the rules and principles of this Policy to the extent that they are applicable to the relevant transactions.

2. DEFINITIONS

"Explicit Consent" Consent related to a specific subject, based on information and expressed with a free will.

"Anonymization" Making personal data, under no circumstances to be associated with an identifiable or identifiable natural person, even by matching it with other data. Making personal data, under no circumstances to be associated with an identified or identifiable natural person, even when by matching with the other data.

"Data Subject" The natural person whose personal data is processed (customers, visitors, employees and employee candidates, etc.).

"Business Partners" Suppliers, dealers, authorized service companies, all kinds of representatives, subcontractors and consultants acting on behalf of the company.

"Personal Data" Any information related with an identified or identifiable real person.

"Processing of Personal Data" Any activity performed on data, such as obtaining personal data by fully or partially automatic means or non-automatic means that are part of a data registration system; recording, storage, retention, revision, modification, disclosure, transfer, receiving of data, rendering the data obtainable or classification or prevention of use.

"Koç Group" means all companies directly or indirectly, individually or jointly controlled by Koç Holding A.Ş. and the joint ventures included in the consolidated financial report of Koç Holding A.Ş .

"KoçSistem" refers to KoçSistem Information and Communication Services Inc.

"Legislation" refers to all relevant legislation in force in Turkey and in the relevant countries regarding the protection of personal data, especially the Law on the Protection of Personal Data No. 6698.

"Special Categories of Personal Data" " refers to race, ethnic origin, political view, philosophical belief, religion, religious sect or other beliefs, clothing style, association, foundation or union membership, health, sexual life, criminal convictions, and security measures as well as biometric and genetic data are special categories of personal data.

"VERBIS" Data Controllers Registry Information System.

"Data Processor" A real or legal person that processes personal data for and on behalf of the data controller based on the authorization granted by the data controller.

"Data Controller" A real or legal person who determines the objectives and means of personal data processing and is responsible for the establishment and management of the data recording system.

3. GENERAL PRINCIPLES

Breach of this Policy may result in significant consequences including legal, administrative, and criminal penalties based on the Legislation in the region of operation for our Company, its associated executives and employees and, most significantly, a breach may result in serious damage to the reputation of Koç Group and our Company.

One of the most important issues for our Company is to act in accordance with the Legislation and the general principles set out in the Legislation with regards to processing of personal data. In this regard, it is expected of our Company to act in accordance with the principles when processing personal data in accordance with the Legislation.

Our Company carries out the personal data processing practices within the scope of its activities in accordance with the Personal Data Protection and Processing Policy of KoçSistem Information and Communication Services¹ .

¹https://www.kocsistem.com.tr/uploads/files/koc-sistem_kvkk_politikasi_5.5.24_web-sitesi.pdf

3.1. Engaging in Personal Data Processing Activities in Accordance with the Law and the Rule of Good Faith

Personal data is processed in compliance with the general rule of trust and good faith, in such a way as not to damage the fundamental rights and freedoms of individuals. In this framework, personal data is processed to the extent and limited to the business activities of our Company.

3.2. Ensuring Personal Data is Accurate and Up-to-Date When Necessary

Our company takes the necessary measures to ensure that personal data is accurate and up-to-date during the processing period and establishes the necessary mechanisms to ensure the accuracy and being up-to-date of personal data for certain periods of time.

3.3. Processing for Specific, Explicit, and Legitimate Purposes

Our Company clearly sets out the purposes of processing personal data and processes it within the scope of the purposes related to these activities in line with its business activities.

3.4. Being limited, proportionate and relevant to the purpose of processing

Our company collects personal data only to the extent of quality and to the extent required by its business activities and processes it for the specified purposes.

3.5. Storing for the Period Stipulated in the Relevant Legislation or the Period Required for the Processing Purpose

Our company keeps personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the relevant legal legislation. In this context, our Company firstly determines whether a period is stipulated for the storage of personal data in the relevant Legislation, and if a period is determined, it acts in accordance with this period. If a legal period does not exist, personal data is stored for as long as necessary for the purpose for which they were processed.

In this context, our Company firstly determines whether a certain period is stipulated for the storage of personal data in the relevant Legislation, if any period is determined, it acts in accordance with this period. If no period is determined, a legal period does not exist, personal data is stored for as long as necessary for the purpose for which they were processed. At the end of the specified storage periods, personal data is destroyed in accordance with the periodic

destruction periods or the data subject's application and with the specified destruction methods (deletion and/or destruction and/or anonymization).

4. IMPLEMENTATION OF THE POLICY

4.1.PROCESSİNG OF PERSONAL DATA İN ACCORDANCE WITH THE TERMS OF DATA PROCESSİNG

4.1.1. Personal Data Processing Activities to Personal Data Processing Conditions Determined in the Legislation Based on Execution

As a rule, personal data must be processed in accordance with at least one of the conditions set out in the Legislation. It should be determined by KoçSistem whether the personal data processing activities carried out by the business units are carried out based on at least one of these conditions, and personal data processing activities that do not meet these conditions should not be included in the processes.

4.1.2. Special Categories of Personal Data Processing Activities Specified in the Legislation Execution Based on Personal Data Processing Conditions

As a rule, personal data of special nature should be processed in accordance with the conditions set out in the Legislation. It should be ensured that the processing of sensitive personal data carried out by the business units by KoçSistem complies with these conditions, and the administrative and technical measures to be taken regarding the processing of special categories of personal data and the existence of the following conditions should be ensured:

- (i) Special categories of personal data other than health and sexual life** can be processed without the explicit consent of the data subject, if it is explicitly stipulated in the laws, in other words, if there is an explicit provision regarding the processing of personal data in the relevant law. Otherwise, the explicit consent of the person concerned must be obtained.
- (ii) Sensitive personal data related to health and sexual life** may be processed without explicit consent by persons or authorized institutions and organizations under the obligation of confidentiality for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and managing health

services and financing. Otherwise, the explicit consent of the person concerned must be obtained.

Special categories of personal data processing activities should be carried out by taking into account the regulations stipulated in the Legislation regarding the processing of special categories of personal data and their transfer to third parties at home and abroad; In addition to the above-mentioned issues, in these cases, personal data processing activities should be carried out by fulfilling the special requirements sought by the Legislation.

4.2. REQUIREMENTS TO BE COMPLIED WITH FOR TRANSFER OF PERSONAL DATA

Our company is able to transfer the personal data and special categories of personal data of data subjects to third parties in accordance with law and the purposes of personal data processing and by taking the necessary security measures. In this regard, our company acts in accordance with the regulations stipulated in the Legislation and the framework drawn up in the decisions of the relevant authority.

4.3. OBLIGATIONS RELATED TO THE PROTECTION AND PROCESSING OF PERSONAL DATA

4.3.1. Obligation to Keep VERBİS Up-To-Date

Our company has fulfilled its obligation to register with VERBİS and updates its information in VERBİS within seven days from the date of the change in case of changes in the registered information. It is the responsibility of the Legal and Compliance Department to carry out updates upon the notifications of the relevant units.

Our Company reports the updates it performs in VERBİS to Koç Holding Legal and Compliance Department twice a year, with 6-month periods (June-December).

4.3.2. Obligation to Inform Data Subjects

In accordance with the Legislation, our company informs the personal data subjects about who, for what purposes, their personal data is processed by the data controller, for what purposes it is shared with whom, by what methods it is collected, and the legal reason and rights that the data subjects have within the scope of processing their personal data.

The Legal and Compliance Department must keep the personal data collection channels up to date as a list and share the list with Koç Holding Legal and Compliance Department twice a year, every 6-month periods (June-December).

4.3.3. Obligation to Ensure the Security of Personal Data and Obligation to Audit

In accordance with the Legislation, our Company takes the necessary measures to prevent the unlawful disclosure, access, transfer of personal data or security deficiencies that may occur in other ways, in accordance with the nature of the data to be protected. In this context, our Company takes administrative measures to ensure the required level of security in accordance with the Legislation and conducts audits or gets audits conducted.

An audit report is prepared regarding the audit results and necessary improvements are made within the scope of this report. The prepared audit report and the measures taken should be shared with Koç Holding Legal and Compliance Department in November every year.

In addition, the Legal and Compliance Department provides trainings on Legislation to employees within the scope of measures. Information is provided to Koç Holding Legal and Compliance Department regarding the trainings held.

4.3.4. Audit of Measures Taken for the Protection of Personal Data

In terms of the technical and administrative measures taken, systems should be established to carry out and have the necessary inspections carried out regarding the functioning of the measures. The results of these audits should be reported to the KoçSistem Legal and Compliance Consultancy and necessary activities should be carried out to improve the measures taken. In addition, the audit report prepared by KoçSistem every year and the measures taken should be shared with the Koç Holding Legal and Compliance Counsel.

4.3.5. Measures to be Taken in Case of Unauthorized Disclosure of Personal Data

If the processed personal data is obtained by others illegally, this situation must be reported to the relevant person and the relevant authorities in accordance with the Legislation as soon as possible. In this context, the necessary internal structure should be established, including KoçSistem Legal and Compliance Consultancy. In addition, in such cases, Koç Holding Legal and Compliance Consultancy should be informed immediately.

4.3.6. Obligation to Inform the Data Subject

The data subjects have the right to request information about their processed personal data by applying data controllers whenever they need. In this direction, the data subjects will be able to benefit from the "KoçSistem Bilgi ve İletişim Hizmetleri A.Ş Data Subject Application Form", which can be accessed at the address <https://www.kocsistem.com.tr/uploads/files/veri-sahibi-basvuru-formu.pdf>

In case the personal data subject submits his requests for the rights provided by Law to our Company, our Company will conclude the relevant request free of charge as soon as possible and within 30 (thirty) days at the latest, depending on the nature of the request. However, if the transaction requires an additional cost, a fee may be charged in accordance with the tariff determined by the Board. In this context, the technical developments that enable the KoçSistem Legal and Compliance Department to reach these requests, which will be responded by them, have been completed by our Company.

Data subject applications and response process are kept in a list and shared with Koç Holding Legal and Compliance Department twice a year for 6-month periods (June-December).

In addition, the opinions of the KoçSistem Legal and Compliance Department and Koç Holding Legal and Compliance Department must be obtained before any action is taken regarding any information and document request from the relevant authorities and any application to be made by our Company to these authorities.

5. AUTHORITY AND RESPONSIBILITIES

All employees and executives of our Company are obliged to comply with this Policy. Our Company expects its Business Partners to comply with this Policy to the extent applicable to the relevant party and transaction and takes necessary steps to do so.

KoçSistem Legal and Compliance Consultancy is the unit responsible for the implementation of this Policy.

In case of being aware of any action considered to be contrary to this Policy, the Legislation in force or Koç Group Code of Ethics or KoçSistem Code of Ethics, you may contact the Company's Compliance Officer and/or Legal and Compliance Department.

Please contact the department or persons listed above for your queries or concerns. As an alternative method, you can make all your notifications about ethical violations via "koc.com.tr/ihbarbildirim" link.

Breach of this Policy might result in disciplinary penalties set out in our Disciplinary Regulations, including dismissal. In the case of breach of this Policy by third parties, the legal relationship between those parties and our Company might be terminated immediately.

6. EFFECTIVE DATE

This Policy is effective as of 30.09.2021 and KoçSistem Legal and Compliance Consultancy is responsible for the execution of the Policy.

Change	History	Notes