GLOBAL PERSONAL DATA PROTECTION POLICY



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INTRODUCTION

In line with our organizational goals We know the importance of a consistent, effective and transparent communication model to achieve global success in line with our organizational goals. Therefore, we have created a comprehensive Global Personal Data Protection Policy to communicate with all our stakeholders in an open, transparent and reliable manner.

With this policy, we process and protect personal data in accordance with the national regulations and international regulations of the countries in which we operate.

1. PURPOSE

With this policy, we determine our company's approach and principles for the protection of personal data in accordance with national and international regulations.

2. SCOPE

This policy covers personel data in all countries where our company operates.

3. MAIN PRINCIPLES

- We process and protects personal data in accordance with the national regulations and international regulations of the countries in which we operate.
- Our company establishes the necessary systems, internal regulations, guidance, processes, authorisations and duties, control and reporting structures for the processing and protection of personal data in full compliance with the regulations, and effectively executes and continuously improves them.
- Obtains personal data for specified purposes and limited to this by appropriate methods and ensures that such data is not used outside the purpose and scope of its acquisition and shares this with the personal data owners.

- Obtains personal data by the most appropriate method for data privacy and security and avoids disproportionate interference with the rights and interests of individuals in the protection of data.
- We take utmost care to protect the Personal Data of our employees, stakeholders, suppliers and third parties.
- We develop and implement all kinds of systems, channels and methods that will enable personal data owners to effectively exercise their rights.
- We inform personal data subjects; regarding the acquisition, processing and protection of personal data in accordance with the regulations, to the extent and in the manner required.
- We process personal data in the volume required by the purpose and retains them for the period stipulated in the regulations or required for the purpose for which they are processed.
- We act in accordance with the principle of not sharing personal data with third parties without the consent of the personal data owner, except in cases stipulated in national and international regulations.
- We aim to prevent unauthorized access, misuse of data, data leakage and data loss by taking all security measures in the collection, processing, protection and transfer of personal data.
- We pay special attention to keeping personal data complete, accurate and up-to-date.
- We establish the necessary processes for the disclosure and correction of personal data. In this regard, we create the necessary processes to resolve all kinds of questions and complaints quickly and easily.
- In the transfer of personal datawe undertakes this issue in the contracts to be organised in order to ensure that the party to whom personal data is transferred takes all kinds of data security measures in the transfer of personal data.
- In cases where the Company determines that personal data has been unlawfully obtained by unauthorised persons, we notify the competent public authority in the country of operation as soon as possible.
- We provide the necessary training and guidance to our employees in order to create awareness for the effective achievement of the objectives regarding the protection of personal data.

Our Corporate Governance Policies are one of the cornerstones of our strategy and an integral part of our business culture. акѕа KAZANCI HOLDİNG