

Karadeniz Holding A.Ş. Personal Data Protection and Privacy Policy

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1. PURPOSE

As Karadeniz Holding A.Ş. (“**Karadeniz Holding**” or “**Company**”) we attach great importance to the protection of persona data. In this context, we are attentive to lawfully process and protect the personal data belonging to Karadeniz Holding and/or Karadeniz Holding group companies and/or Karadeniz Holding’s employees, visitors, sponsors, business partners, authorities, candidate employees, trainees, suppliers, employees and authorities of the institutes/sponsors/suppliers it cooperates, third persons including but not limited with other persons whose are not listed in this present document (hereinafter the persons listed here shall be referred together as “**Respected Persons**” or individually as “**Respected Person**”).

This present Personal Data Protecting and Privacy Policy (“**Policy**”) is prepared with the aim to process personal data when performing the activities of our Company in accordance with the provisions of relevant legislation and laws especially including Personal Data Protection Act (“PDPA”) number 6698 ("KVKK"). Besides that, the policy aims to create a policy for processing of personal data in accordance with the law and to ensure transparency by informing the Respected Persons about the personal data that our company processes. In this context, as it is explained with details in the policy, we process personal data as Karadeniz Holding under the following principles and rules:

- According to the 4th article of PDPA, personal data is processed in accordance with law and good faith, for definite, clear and legitimate purposes, kept in our Company in a correct and up to date manner both in physical and electronic environments, maintained in connection with the purpose they are processed during a limited and measured period, and as long as necessary for the purpose of which they are processed or as it is prescribed in the relevant legislation.
- Necessary administrative and technical measures stipulated in 12th article of PDPA are taken.
 - During the acquisition of their personal data, pursuant to 20th article of Constitution and 10th article of PDPA the Respected Persons are informed about which purposes the personal data will be processed, to which persons the processed personal data may be transferred and for which purposes, the method and legal reason for the collection of personal data, and Respected Person are fully informed about their rights in accordance with 11th article of PDPA.
 - In case it is necessary in accordance with the provisions of 20th article of Constitution and 5th article of PDPA, explicit consent of Respected Persons must be taken for processing their personal data.
 - According to the 6th article of PDPA, our Company exercises due diligence to the processing and protection of personal data with special qualification.

- Necessary methods are applied in our company's structure related with Respected Persons for using their rights stipulated in 11th article of PDPA.
 - Our company acts in accordance with the provisions of 8th and 9th articles of PDPA pursuant to the requirements of processing purpose of personal data and also acts pursuant to the legislation and regulations of PDP Board for transferring to third parties in and outside of the country.
 - Pursuant with the 7th article of PDPA and provisions of Regulation About Deletion, Destruction or Anonymity of Personal Data, in case the reasons that require processing of personal data are eliminated, our Company shall delete, destroy or anonymize personal data immediately or due to the request of Respected Person . In this context, a Personal Data Retention and Destruction Policy have been prepared.

2. SCOPE

The policy covers all personal data of Respected Persons that is processed automatically or non-automated means with the condition being a part of any data registration system. The main methods of processing personal data by Karadeniz Holding are oral, written or electronic platforms used through Karadeniz Holding Group companies, printed documents, telephone, website, online services, e-mail, social media and similar vehicles.

3. IMPLEMENTATION AND ENFORCEMENT

The processing and protection of personal data will be regulated primarily under the scope of PDPA and other applicable legislation. As regulatory provisions may change over time, our company may update the policy by making changes time to time in the Policy. If there is any incompatibility between the legislation and the Policy in force, as Karadeniz Holding, we acknowledge that the applicable legislation will be applied.

The policy, prepared by Karadeniz Holding is entered into force on 13th of May 2019. Policy is published on our Company's website www.karadenizholding.com and submitted to the Respected Persons at the request of Respected Persons. Our Institutional Development Department is responsible for the implementation of Policy throughout the Company. If a change is made in Policy, the effective date and relevant articles will be updated accordingly. The Updating Table is given in Appendix – 2.

4. OUR PRINCIPALS

Our Company is processing the personal data according to below written principals that are regulated in 4th article of PDPA.

a. Processing in Accordance with Law and with Good Faith

Our company acts in accordance with the rules of principles of honesty, PDPA, and other relevant legislation while processing the personal data. Personal data is not collected and processed in any way

without informing the respected Person. Personal data is not used in a way that leads to injustice against Respected Person or goes beyond the purpose of collecting personal data. Personal data is processed in a measured and proportional manner in accordance with the purpose of their collection.

b. Ensuring that Personal Data is Accurate and Up to Date when needed

By taking the fundamental rights of Respected Persons into the consideration and its own legal interests, our Company ensures that the personal data to be processed is accurate and up to date. It takes the necessary precautions accordingly. In this context, it has created a system that will ensure the information of Respected Persons is accurate and up to date.

c. Processing for Clear and Legitimate Purposes

Our company processes personal data for legitimate purposes in accordance with the principals of honesty. In this respect, it takes utmost care to clarity and definiteness principle during the preparation of legal texts (express consent, explanations, etc.) issued under the law of processing personal data. Instead of using the legal and technical terminology that only relevant experts can understand, it prefers open and clear expressions that can be understood by Respected Person. In this way, Respected Persons can easily understand with which purpose their personal data is processed. Our Company informs the Respected Person about the purpose of processing personal data during the personal data process.

d. Being Relevant, Limited and Moderate with the Processing Purposes

Our Company is processing personal data solely for a specific and valid purpose, under no circumstance processes the personal data for a purpose that doesn't exist at the moment of processing, but it may realize in the future. For example, it does not use personal data that it processes for sales purposes later on for marketing purposes, if the personal data will be processed for different purposes; it makes different notifications to Respected Persons. Besides that, personal data outside the purpose are not processed.

e. Retain the Data Until the Time Required for the Purpose Stipulated in Related Legislation or Necessary for Processing Purpose

Our company retains the personal data only as long as it is stipulated in related legislation or necessary for the purpose that is processed. First of all, it is determined if a period of time for retaining personal data is prescribes in the relevant legislation. If such a time has been determined, our Company is acting in accordance with this period, and if no period of time is determined, our Company retains the personal data as long as necessary for the purpose that they processed. The personal data is deleted, destroyed or anonymized by our Company if the period is expired or the reasons for processing are no longer valid. Personal data is not kept with the possibility of future needs.

5. DATA SECURITY

Pursuant to 12th article of PDPA, in order to prevent the unlawful processing and accessing to the personal data, and ensuring lawful protection of the data, our Company is taking necessary technical and administrative measures to ensure the appropriate level of security.

In this context, it performs the necessary audits either in its own company structure or contract out in accordance with 12th article of PDPA. Results of these audits and non-conformities identified within the scope of Company's internal operation are reported to the relevant department and necessary activities are carried out to improve the measures that are taken.

In the event that personal data is acquired by others in non-lawful ways, our Company has established and activated the system that allows informing Respected Person and PDP Board within the shortest time. If required by PDP board, this may be announced on the PDP Board's website or by another method.

Primary technical and administrative measures that are taken to prevent unlawful processing of personal data, unlawful access to this data, and to ensure the lawful protection of personal data as listed below:

- Technological investments to be made for ensuring the safety of personal data are planned by determining the costs of these investments
- Personnel whose are well-educated in technical issues are employed.
- Taken technical measures are periodically reported to relevant person according to the requirements of internal audit mechanism, the issues that pose risks are re-evaluated and necessary technological solutions are produced.
- Software and hardware containing the virus protection systems and firewalls are installed.
- Appropriate backup programs are used to ensure safe storage or personal data.
- Employees are informed and trained about personal data protection law, processing the personal data in accordance with law, and measures to be taken to prevent illegal access to personal data.
- Consultancy services are provided from an international consulting company for the analysis of personal data processed in company structure and actions to be taken for complying with PDPA and personal data that may be accessed by business units are reviewed, then the works related with accesses that are considered unnecessary are started.
- All activities carried out by our company have been analyzed in detail in all business units, as a result of this analysis, activities carried out by the relevant business units have been reflected to personal data inventory in a detailed and process-based manner.
- In order to fulfill our legal obligations within the scope of relevant inventory, works have been started throughout the Company, Company documents are reviewed in terms of PDPA and necessary modifications are made on these documents, and incomplete documents are prepared.
- Intercorporate policies have been prepared to control aforementioned measures and to ensure the continuity of their application.
- In accordance with the legal requirements contained in the inventory, the access and authorization processes of personal data are designed and implemented.
- The agreements which are concluded by our company with the persons to whom the personal data is lawfully transferred in accordance with the law shall include special provisions that persons whom

the personal data is transferred will take the necessary safety measures for protecting the personal data and they will ensure that their own organizations will also comply with such measures.

- Prior processing the personal data of our visitors, it was ensured that they are properly informed in accordance with PDPA and their explicit consents were obtained.

6. PROCESSING METHOD OF PERSONAL DATA

Your personal data is collected through our Companies, website, written/digital applications made to our Company and other web sites, telephone conversations, e-mail correspondences, support service companies including organizations via the channels that our Company is authorized to communicate with you or may be communicate with you in the future within the limits and extent permitted by the relevant legislation and concluded agreements, and in cases that our Company is legally obligated by taking your consent.

Your personal data collected by these methods may be processed and transferred under the conditions and purposes of personal data processing stipulated in the 5th and 6th articles of Law number 6698 and for the purposes specified in this present article of Policy.

Our Company is informing the Respected Persons during obtaining the personal data in accordance with 10th article of PDPA and provisions of Notification of Clarification. In this context, our Company makes the necessary clarifications about the identity of Karadeniz Holding and its if exists its representative, the processing purpose of personal data, to whom and for what purpose that the personal data may be transferred, the method and legal reason for collecting personal data, rights of Respected Persons that they have under the scope of 11th article of PDPA. In accordance with 10th article of PDPA and in the scope of clarification liability, our Company is reporting to Respected Persons which group of Respected Persons' personal data is processed, purpose of processing the personal data of Respected Person and retention periods of personal data.

Another condition of processing personal data is the explicit consent of Respected Person. In the situations that require an explicit consent, our company provides the opportunity to explain the explicit consent of Respected Person based on a particular subject, informed and with his/her free will.

As a rule, our Company is taking the explicit consents of Respected Persons for processing their personal data in written form. However, in the event of the presence of any of the personal data processing requirements specified in article 5/2 or 6/3 of PDPA, explicit consent of Respected Person will not be sought. These terms are described in detail below.

a) LEGAL STIPULATION

In case the activities related with processing the personal data are clearly stipulated in laws, personal data may be processed without seeking the explicit consent of Respected Person.

(E.g. documents that are requested from employee for creating the personal file stipulated in Labor Law number 4857)

b) NOT TAKING THE EXPLICIT CONSENT OF RESPECTED PERSON DUE TO ACTUAL IMPOSSIBILITY

In case it is necessary for our Company to make personal data processing activity for saving the life or body integrity of Respected Person or another person, and if the respected Person is not able to give his/her explicit consent due to the actual impossibility or legal invalidity, personal data may be processed without the explicit consent of Respected Person.

(E.g. To share the blood group information of the employee who has an accident with the workplace doctor)

c) DIRECT RELATION WITH THE CONCLUSION OR EXECUTION OF AN AGREEMENT

With the condition that processing of personal data is necessary for our Company to conclude or execute an agreement or directly related with it, if it is necessary to process personal data belonging to the parties of agreement, personal data may be processed without seeking the explicit consent of Respected Person.

(E.g. Registering the address information of a natural person for making the delivery,)

d) FULFILLING THE LEGAL OBLIGATION OF COMPANY

In case the processing of personal data is necessary for fulfilling the legal obligations of our Company as Data Controller, personal data may be processed without seeking the explicit consent of Respected Person.

(E.g. processing the personal data of employees for issuing salary payrolls)

e) RESPECTED PERSON'S DISCLOSURE OF HIS / HER PERSONAL DATA

With the condition that the personal data is disclosed by Respected Person, personal data may be processed by our Company without seeking the explicit consent of Respected Person limited with the purpose of disclosure.

(E.g. Respected person discloses his/her contact information for reaching him/her in emergency cases)

f) MANDATORY PROCESSING OF PERSONAL DATA FOR ESTABLISHING OR PROTECTING A RIGHT

In case processing of personal data is mandatory for establishing, using or protecting a right, personal data may be processed without seeking the explicit consent of Respected Person.

(E.g. Retaining the personal data with evidence quality –agreement, invoice, etc.- during limitation period and using that when necessary)

g) MANDATORY PROCESSING OF PERSONAL DATA FOR LEGITIMATE INTERESTS OF OUR COMPANY

With the condition not to harm Respected Person’s rights and freedoms, if data processing is necessary for the legitimate interests of our Company, personal data of Respected Person may be processed.

(E.g. Processing personal data related with the performance of an employee for applying bonuses and premiums that increase employee loyalty)

7. METHODOLOGY OF PROCESSING PERSONAL DATA WITH SPECIAL QUALIFICATION

6th article of PDPA regulated the data related with racial, ethnic origin, political thought, philosophical belief, religion, sect or other beliefs, appearance and clothing, association, foundation or union membership, health, sexual life, criminal conviction and security measures, biometric and genetic data as personal data with special qualification and processing of such data has been subjected to a more sensitive protection.

Our company is informing the Respected Persons during obtaining the personal data with special qualification in accordance with the 10th article of PDPA. In this context, the identity of Karadeniz Holding and if exists its representative, the purpose of processing the personal data with special qualification, to whom and with which purposes that the processed personal data with special qualification can be transferred, the method of collecting and legal cause of personal data with special qualification and rights that Respected Persons have under the scope of 11th article of PDPA will be notified. In accordance with the 10th article of PDPA and in the context of clarification obligation, our Company is informing the Respected Persons about which contact groups’ personal data with special qualification is processed, purposes and retention periods of processing the Respected Person’s personal data with special qualification.

Personal data with special qualification is processed by taking appropriate measures in accordance with PDPA and by making/performing the necessary audits. As a rule, one of the conditions for processing personal data with special qualification is the explicit consent of Respected Person. Our company provides the opportunity to explain the explicit consent of Respected Person based on a particular subject, informed and with his/her free will.

As a rule, our Company is taking the explicit consents of Respected Persons for processing their personal data in written form. However, in the event of the presence of any of the personal data processing requirements specified in article 5/2 or 6/3 of PDPA, explicit consent of Respected Person will not be sought.

8. OUR PERSONAL DATA PROCESSING PURPOSES

Our Company is processing the personal data with the following purposes including (but not limited) to perform the necessary works by our respective business units to carry out the activities we conduct and to

perform related business processes; the provision of legal, technical and commercial-business security of our Company and the Respected Persons that have business relationship with our Company; for planning and executing Company's commercial and/or business strategies; to perform the necessary works by our business units for making our services available to the Respected Persons that are provided by our Company and to conduct related business procedures; planning and executing human resources policies and procedures.

- Conducting Company activities,
- Planning and executing the corporate communication,
- Planning and executing Human Resources and Occupational Health and Safety procedures,
- Providing the legal and commercial safety of the persons who have business relations with our Company,
- To be able to inform you about Company innovations and activities,
- Contacting you through the information you send via our e-mail addresses given in our website
- To conduct invoicing and other accounting transactions for our services,
- Providing the necessary inspections such as security in business processes and planned periodical internal audit activities
- Providing building safety of Company's head office and branch offices,
- Determination and implementation of our company's commercial and business strategies,
- Offering the service that you requested,
- Conducting our company's legal processes
- Management of contractual processes and performance of contractual obligations,
- Implementation and supervision of workplace rules,
- Submission of proposals for our services,
- Measuring the satisfaction you feel from our services and improving our services in this respect, risk management, planning, auditing and implementation of corporate sustainability, corporate governance, strategic planning and information security processes; ensuring business continuity,
- Conducting our finance, communication, market research and procurement operations,
- Maintaining intercorporate system and application management operations,
- Managing relationships with our suppliers and other business partners,
- Taking photos and videos in organizations, managing marketing activities, publishing press releases, creating records of organization participants,
- Fulfilling legal obligations arising from the legislation,
- Providing communication with Karadeniz holding group companies domiciled in Turkey and Karadeniz Holding group companies domiciled in abroad, conducting the necessary operations and reporting activities,
- Managing the procedures in public institutions and organizations such as Social Security Institution,
- Giving support for personnel recruitment processes of Karadeniz Holding Group Companies,
- Ensuring the security of the Karadeniz Holding values,
- Supporting Karadeniz Holding Group Companies to comply with the related legislation,
- Providing support for the planning and implementation fringe benefits and interests to be given to the senior executives of Karadeniz Holding and Karadeniz Holding Group Companies,

- Planning and execution of auditing activities for conducting the operations of Karadeniz Holding Group companies in accordance with Karadeniz Holding procedures and related legislation,
- Providing support for the realization of corporations law and legislation procedures of Karadeniz Holding Group Companies,
- Realization of the actions to protect the reputation of Karadeniz Holding and Karadeniz Holding Group Companies,
- Creating the visitor records and making their follow-up processes,
- Monitoring and preventing the misuse and unauthorized transactions.

In accordance with the above mentioned purposes, it is seen that a large proportion of the activities and processes carried out by our company are covered by art. 5/2 and art. 6/3 of PDPA, and therefore do not require explicit consents of the Respected Persons. However, if the activities or processes that are carried out do not included into this scope, explicit consents of Respected Persons are taken.

9. PROCESSING THE DATA BY KRADENİZ HOLDING WHICH ARE PROCESSED BY KARADENİZ HOLDING GROUP COMPANIES

Karadeniz Holding is able to process the personal data that is being processed by Karadeniz Holding group companies in order to protect the rights and interests of the group of companies and its reputation. If this situation is realized, relevant Karadeniz Holding Group Company informs the Respected Person that his/her personal data may be sent to Karadeniz Holding.

10. TRANSFERRING THE PERSONAL DATA

With the condition to be limited with the extent necessary for realization of the above-mentioned objectives and for fulfillment of the obligations arising from the law; your personal data may be shared with our suppliers that we cooperate for the execution of services offered by our medical Company and we procure various services, with our sponsors, our business partners (software firms that are providing technical support services, the firm that offers auditing service, electronic commerce service offering company, advertising agencies, car rental company, etc.), private insurance companies (health, retirement and life insurances and similar), Social Security Institution, General Directorate of Security Affairs and other law enforcement offices, General Directorate of Civil Registration, other related public institutes and organizations, courts, our authorized representatives, your affiliated and/or organization that you are working, third parties that we get consultancy services including lawyers, tax consultants and auditors, regulatory and administrative bodies and official authorities, Karadeniz Holding group companies domiciled in Turkey and Karadeniz Holding group companies domiciled in abroad.

Your personal data can be stored and maintained, can be classified in accordance with the requirements of market research, financial and operational processes and marketing activities, updated in different periods, and in the extent given by the legislation, within the limits of laws and within the scope of confidentiality can be transferred to 3rd parties and/or suppliers and/or service providers and/or our affiliated foreign shareholders required by the service, the information may be transferred in accordance with the policies we adhered on and for the reasons stipulated by other authorities, may be stored, records and documents may

be issued in electronic or paper environments that can be processed through reporting for creating basis for transactions, and may be transferred in the scope of conditions and purposes of personal data processing stipulated in 8th article of PDPA related with the transferring personal data and 9th article related with transferring the personal data to abroad.

In the event of the provision of the terms stipulated in art. 5/2 and art. 6/3 of PDPA, our Company may transfer personal data and personal data with special qualification without the explicit consent of Respected Person by taking adequate measures determined by PDP Board.

Your personal information will always be processed in strict confidence if you don't consent to the sharing of data in writing or electronic form, or if the reasons stipulated in art. 5/2 of PDPA are not available, or if we are not legally obligate, they will not be shared with the third parties that are not acting on behalf of our Company.

Concurrently, please note that we can share your personal information with other global companies in our network for the above given purposes, and in this context we may use the existing technological products to provide our services in the most efficient way such as cloud information technologies.

11. PERSONS TO WHOM THE PERSONAL DATA IS TRANSFERRED AND TRANSFERRING PURPOSES

Our company is notifying the groups to whom the personal data is transferred to Respected Person in accordance with the 10th article of PDPA. Persons whom the data is transferred, their scope and data transfer purposes are given in the following table.

TRANSFERRED PERSONS and ORGANIZATIONS	DEFINITION	PURPOSE OF DATA TRANSFER
Business Partner	It defines the parties to whom our Company established a business partnership when it is conducting its commercial activities for the purposes such as selling, promotion and marketing the services of our Company and after-sale support.	Limited with the fulfillment of establishing purposes of business partnership
Customer	It defines the persons and/or employees/authorized signatories/other natural persons of the companies that our Company is offering services.	Limited with the purpose of offering services to our customers
Affiliates	Companies in which the Company is a shareholder	Limited with the conduction of Company's commercial activities that requires the participation of its affiliates
Karadeniz Holding group companies	All companies related with Karadeniz Holding	Limited with the purposes such as planning of strategies related with Company's commercial activities, continuation of its operations and controlling
Supplier	It defines the parties that are offering	Limited with the purpose to provide

	services to our Company based on the contracts in accordance with the orders and instructions of our Company when conducting its commercial activities, or employees/executives/other related persons of such parties.	outsource from supplier and service offering of our Company
Legally Authorized Public Institutes and Organizations	Public institutes and organizations that are authorized to receive information and documents from our Company according to the provisions of the relevant legislation	Limited with the purpose demanded by relevant public institutes and organizations due to their legal authorizations
Legally Authorized Private Persons/Entities	Private persons/entities authorized to receive information and documents from our Company according to the provisions of the relevant legislation	Limited with the purpose demanded by private persons/entities due to their legal authorizations (e.g. Occupational Health and Safety Company)

12. RETENTION PERIODS OF PERSONAL DATA

Our Company retains personal data and personal data with special qualification in limited periods stipulated in PDPA and other relevant legislation. The above mentioned personal data will be transferred to our Company and/or our suppliers ' physical archives and information systems, and can be kept both in digital and physical environments.

If no time has been specified in the legislation for the duration of retaining period of personal data, the personal data is stored for the period determined by taking into consideration the following criteria, then destroyed after its expiration:

- In the scope of processing of the relevant data category, the period which is generally accepted in the sector where data controller operates,
- The period that requires the processing of personal data in relevant data category and that the continuation period of legal relationship established with Respected Person,
- Depending on the purpose of processing the relevant data category, the period which the data controller will be entitled for legitimate interest in accordance with the law and the rules of honesty,
- Depending on the purpose of processing the relevant data category, the period that legally continues for risks, costs and responsibilities of retained data,
- Whether the maximum time to be determined is suitable to keep the relevant data category in accurate form and up to date,
- The period that data controller is legally obligated to retain the personal data in relevant data category,
- The limitation period determined by data controller to stake out a claim related with the data in relevant data category.

If the purpose of processing personal data has ended; and retention period determined in relevant legislation and Company is also expired; personal data may only be retained for the purpose of creating evidence for possible legal disputes, or for claiming a right related with personal data or to establish a defense. Despite the limitation periods determined for alleging the right mentioned here is exceeded and the limitation period is expired, retention periods are determined based on the examples previously submitted to our Company for similar subjects. In such cases, it is not possible to access to the retained personal data for any other purpose, accessing to relevant personal data is solely provided when it should be used in respective legal dispute. After the said period is ended, the personal data is deleted, destroyed or anonymized

13. CATEGORIZATION OF PERSONAL DATA

Personal data is processed in our Company under the categories shown in following table.

PERSONAL DATA CATEGORY	DEFINITION
Identity Information	All information taken place in the documents such as Driver's License, Identity Card, Certificate of Residence, Passport, Attorney Identity, Marriage Certificate
Location Data	Personal data identifying the location where Karadeniz Holding vehicles and devices are located; GPS location, travel data etc.
Contact Information	Information such as telephone number, address, e-mail
Customer Information	Information about respected person obtained and produced as the result of operations carried out by our business units within the framework of our services
Family Members and Relatives Information	Information about the family members and relatives of Respected Person to protect the legal interests of the employees, information about the family members or relatives of visiting children
Process Security Information	Personal data processed to ensure our technical, administrative, legal and commercial security when conducting our commercial activities
Risk Management Information	Personal data processed to manage our technical and administrative risks through the methods used in accordance with the generally accepted legal, business practices and honesty rules in this sector
Personnel Information	Any personal data that is processed to obtain information which is fundamental for conferring the rights of our employees or the natural persons who have business relationships with our Company
Employee Candidate Information	Personal data processed in relation with the persons who have applied to our Company for employment or evaluated as an employee candidate in accordance with the requirements of our Company's human resources due to business practices and honesty rules, or the persons who have business relationship with our Company
Fringe Benefits and Interests Information	Personal data processed for the planning of fringe benefits and interests we currently offer or will be offered in the future to our employees or to other persons that have a business relation with our Company, for the determination of objective criteria related to this entitlement, and follow-up the allowance of such benefits and interests
Legal Transaction and Conformity Information	Personal data processed for determination and follow-up of our legal receivables, discharge of our obligations, legal liabilities, and processed in the scope of complying with policies of our Company
Audit and Inspection Information	Your personal data processed within the scope of our company's statutory obligations and compliance with Company policies
Personal data with special qualification	Data stipulated in 6 th article of PDPA
Request Complaint Management Information	Personal data concerning with receiving and evaluating all kinds of complaints submitted to our Company
Event Management Information	Information and evaluations collected about the events that have potential influence on our Company, its employees and shareholders
Audio/Visual Data	Photograph and camera records, voice records and copies of documents containing personal data

14. CATEGORIZATION OF RESPECTED PERSONS

Although the personal data of Respected Person categories listed below is processed by our company, the scope of Policy's application is limited with the Respected Persons. Descriptions of these persons are given in the following table.

Although the categories of the Respected Persons are in the above mentioned scope, the persons who are outside of these categories will also be able to submit their requests to our Company under the scope of PDPA; requests of these persons will also be assessed under the Policy.

RESPECTED PERSON CATEGORY	DEFINITION
Customer / Sponsors	Natural persons whose are getting services from our Company or our contracted sponsors
Potential Customer	Natural persons who have requested or interested to use our services or evaluated in accordance with the precedents and rules of honesty that they may have such interests.
Visitor	Real persons who have entered into the physical premises of our Company or visited our websites for various purposes.
Third Party	Third party natural persons whose are related with these persons to ensure the safety of our Company's commercial transaction between the aforementioned parties or to protect the rights of the aforementioned persons and to provide benefits (e.g., sponsors, accompanying persons, family members, and relatives), or even if it is not expressly stated under the Policy, all natural persons that our Company is processing their personal data for a particular purpose.
Employee Candidate	Natural persons who have applied for a job to our Company in any form or have opened their CV and related information to our company's review.
Employee of Group Company	Group companies of our Company resident in Turkey, and representatives and employees of Karadeniz Holding Group Companies resident in abroad
Company Executive	Members of the board of directors of our Company and other natural persons authorized by our Company (e.g. authorized signatories)
Employees, Shareholders, Officials of the Organizations That We Cooperate	Natural persons whose are working in the organizations that our Company has any kind of business relation (including but not limited with business partners, suppliers, etc.) including the shareholders and officials of these organizations.

15. PERSONAL DATA PROCESSING ACTIVITIES MADE IN KARADENİZ HOLDING OFFICES

Security cameras are used to ensure the safety of our company. Personal data processing activity is carried out by our company through the use of security cameras.

Our company uses security cameras to ensure safety of our Company. Personal data processing activity is carried out by our company through the use of security cameras.

In the scope of surveillance activity with security camera; our Company has the aim to improve the quality of offered services, to secure its reliability, to ensure the safety of life and property of our Company, Respected Person and other persons, to prevent misuse and to protect the legitimate interests of the aforementioned items.

Personal data processing activities carried out by our Company with security cameras are carried out in accordance with the Constitution, PDPA and other relevant legislation.

In accordance with the 4th article of PDPA, our Company processes personal data in a limited and measured manner in connection with the purpose for which they are processed. The privacy of the person is not subjected to monitoring in a way that may result in an intervention goes beyond the security objectives. In this context, the Respected Persons are informed about personal data processing activities. However, due to the fact that our Company has the legitimate interests, their explicit consents are not taken.

In accordance with the 12th article of PDPA, necessary technical and administrative measures are taken by our Company to ensure the safety of personal data obtained as a result of surveillance activity made with the cameras.

16. RETAINING THE RECORDS OF INTERNET ACCESS PROVIDED TO OUR VISITORS IN KARADENİZ HOLDING'S OFFICES

Ensuring the security by our Company and for the purposes outlined in Policy; internet access can be provided to our visitors who request that during your stay in our premises and Company. In this case, the log records for your Internet access are recorded in accordance with the Law number 5651 and imperative provisions of the legislation regulated pursuant to this Law; these records are only processed if it is requested by authorized public institutions and organizations or in order to fulfill our legal obligation in the audit processes carried out within the company.

Only a limited number of Karadeniz Holding employees can access to the log records obtained in this framework. Company employees who have access to the aforementioned records will only access to these records for using upon the requests submitted by authorized public institutions and organizations or during the auditing processes and share them with legally authorized persons.

17. DELETION, DESTRUCTION AND ANONYMIZING THE PERSONAL DATA

a) Karadeniz Holding's liability of deleting, destructing and anonymizing the personal data

According to 138th article of Turkish Penal Code, 7th article of PDPA, and Regulation About Deletion, Destruction or Anonymization of Personal Data, despite they are processed in accordance with the provisions of applicable law, in case the reasons requiring to process personal data are eliminated, personal data shall be deleted, destroyed or anonymized pursuant to Company's own decision or upon the request of Respected Person. The concepts of deletion, destruction and anonymity in Policy are used within the

framework of the definitions stipulated in Regulation About Deletion, Destruction or Anonymization of Personal Data. In this context, a Personal Data Retention and Destruction Policy has been prepared.

For the situations that our Company has the right and/or liability to retain personal data in accordance with art. 5/2 of PDPA, Company reserves the right not to fulfill the request of Respected Person for destruction.

b) Deletion, destruction and anonymizing techniques of personal data

• Deletion and Destruction Techniques of Personal Data

Procedures and principals of deletion and destruction techniques of personal data by Karadeniz Holding are listed below:

- **Physical Destruction:** Personal data can also be processed in non-automated ways, provided that it is a part of any data logging system. When deleting/destroying such data, the physical destruction of personal data is made in an unrecoverable manner.
- **Secure Deletion from Software:** When the data is processed in fully or partially automated ways and stored in digital media are deleted/destroyed; methods are used to delete data from corresponding software so that it cannot be recovered again.
- **Secure Deletion by Expert:** In some cases it can make an agreement with an expert to delete personal data on its behalf. In this case, personal data will be deleted/destroyed by the expert in an unrecoverable manner.
- **Blackening:** Making the personal data physically unreadable.

During the execution of above mentioned processes, in order to ensure data security, Karadeniz Holding is fully complying with the provisions of PDPA, secondary legislation and other relevant legislation, and takes all necessary administrative and technical measures.

• Anonymizing Techniques of Personal Data

Anonymization of personal data means to make the data to be unable to associate the identity with a specific or identifiable natural person even by matching the personal data with other data. Our Company may anonymize personal data when the reasons requiring the legal processing of personal data are eliminated.

In accordance with PDPA art. 28; anonymized personal data can be processed for research, planning and statistical purposes. Such processes are not included into the scope of PDPA and express consent of Respected Person shall not be sought for such personal data.

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

- Masking

It means to make the personal data unidentifiable by deleting certain areas or putting asterisks onto them.

E.g. If a part of Respected Person's phone number replaced with asterisks, a masking is made.

- **Consolidation**

It means cumulating the data and reflecting their total values.

E.g. Expressing the number of female employees in Company as 40% and number of male employees as 60%.

- **Data Derivation**

It means to replace existing detailed data with more general equivalents.

E.g. Anonymization is made by writing directly the age of a person instead of day/month/year details of his/her birth date.

- **Pooled Data**

It means to destruct the detectable characteristics of people without damaging the total benefit by mixing the values in a dataset.

E.g. In a workplace where it is wanted to find the average age, a pooled data is made by mixing the values indicating ages of employees.

18. RIGHTS OF RESPECTED PERSONS

Our Company informs the Respected Person about his/her rights in accordance with 10th article of PDPA, guiding the Respected Person about how to use these rights; and our Company operates the necessary channels, internal operations, administrative and technical organizations according to 13th article of PDPA for evaluating the rights of Respected Persons and making the necessary notifications to Respected Persons.

a) Rights of Respected Persons

Respected Persons have the following rights:

- To learn if their personal data is processed or not,
- If their personal data is processed, to request information about it,
- To learn the purpose of personal data processing and if they are used in accordance with such purposes,
- To know the third persons that personal data is transferred inland or abroad,

- In case personal data is processed incompletely or incorrectly, to request their correction and in this context, also requesting to notify made processes to third parties whom the personal data is transferred,
- Despite it has been processed in accordance with the provisions of PDPA and other relevant laws, if the reasons that require the processing are no longer valid, requesting the deletion or destruction of personal data, and in this context, also requesting to notify made processes to third parties whom the personal data is transferred,
- Making objection to the emergence of a result against respected person by analyzing the processed data exclusively through automated systems
- To request indemnification if he/she is suffered a loss due to illegal processing of personal data.

b) Situations in which the Respected Person cannot Allege his/her rights

As following situations are excluded from the scope of PDPA according to 28th article of PDPA, Respected Persons cannot allege their rights stipulated in 11th article of PDPA for these matters:

- Processing of personal data for purposes such as research, planning and statistics by anonymizing them through official statistics
- Provided that the personal data will not violate national defense, national security, public safety, public order, economic security, right to privacy or personal rights, or not to constitute a criminal offence; processing them for art, history, literature or scientific purposes, or in the scope of freedom of expression.
- Processing of personal data by public institutions and agencies authorized by law as a part of preventive, protective and informative activities for providing national defense, national security, public safety, public order or economic security
- Processing of personal data by judicial authorities or execution offices in relation with the investigation, prosecution, judgement or execution processes.

According to 28/2nd article of PDPA, except the right to request indemnification, the Respected Persons cannot allege their other rights stipulated in 11th art. of PDPA:

- It is necessary to process personal data to prevent criminal committal or to investigate a crime.
- Processing the personal data disclosed by Respected Person himself/herself.
- In case it is necessary to process personal data based on the power vested in law by competent and authorized public organizations and institutes and professional organizations with public institution status for executing the investigation or regulation duties, and disciplinary investigations and proceedings.
- It is necessary to process personal data for the protection of economic and financial interests of the State in relation with the budgetary, tax and financial issues.

c) Respected Person's Usage of His/Her Rights

Respected Persons may submit their requests related with their rights stipulated in 11th art. of PDPA to our Company for free of charge via below written method:

- 1) After filling the [form](#) given in www.karadenizholding.com.tr address and signing with wet-signature, personally deliver it by hand to Karadeniz Holding A.Ş. Merkez Mahallesi, Develi Caddesi, No:14, Kağıthane/Istanbul address.
- 2) After filling the form given in www.karadenizholding.com.tr address and signing with wet-signature, to send it via Notary Public to Karadeniz Holding A.Ş. Merkez Mahallesi, Develi Caddesi, No:14, Kağıthane/Istanbul address.
- 3) After filling the form given in www.karadenizholding.com.tr address and signing with “Secure Electronic Signature” defined in Electronic Signature Law Number 5070, send the form with secure electronic signature to registered karadenizholding@karadenizholding.hs03.kep.tr address via electronic mail.

It is not possible for third parties to use the right to demand information regulated in 11th article of PDPA on behalf of the Respected Persons. In order to request personal data relating to a person other than the Respected Person himself/herself, notarized original of special power of attorney with wet signature that is issued by Respected Person for the person who will apply must be presented.

d) Complaining Right of Respected Persons to PDP Board

In case the application is rejected, if the given answer found insufficient, or not answered in its due time; Respected Persons can make a complaint to PDP Board in thirty days after they received our Company’s reply or in any case in sixty days following the application date in accordance with the 14th article of PDPA.

19. APPLICATION RESPONDS OF KARADENİZ HOLDING

In the event that Respected Person’s request is submitted to our Company, our Company will finalize the relevant request within the shortest time and latest in thirty days according to the qualification of request.

Our Company may request information/documents from the applicant to determine whether he/she is the Respected Person. In order to clarify the issues contained in Respected Person’s application, our Company may ask some questions to Respected Person about his/her application.

In following cases, application of the applicant may be rejected by explaining its justification:

- Processing of personal data for purposes such as research, planning and statistics by anonymizing them through official statistics,
- Provided that the personal data will not violate national defense, national security, public safety, public order, economic security, right to privacy or personal rights, or not to constitute a criminal offence; processing them for art, history, literature or scientific purposes, or in the scope of freedom of expression,
- Processing of personal data by public institutions and agencies authorized by law as a part of preventive, protective and informative activities for providing national defense, national security, public safety, public order or economic security.
- Processing of personal data by judicial authorities or execution offices in relation with the investigation, prosecution, judgement or execution processes,

- It is necessary to process personal data to prevent criminal committal or to investigate a crime.
- Processing the personal data disclosed by Respected Person himself/herself.
- In case it is necessary to process personal data based on the power vested in law by competent and authorized public organizations and institutes and professional organizations with public institution status for executing the investigation or regulation duties, and disciplinary investigations and proceedings.
- It is necessary to process personal data for the protection of economic and financial interests of the State in relation with the budgetary, tax and financial issues.
- In case the respected person's request has the possibility to prevent other people's rights and freedoms.
- Respected Person made requests that require disproportionate efforts.
- Requested information is publicly available.

20. POLICY'S RELATION WITH OTHER COMPANY DOCUMENTS

Policy is the fundamental arrangement of the processing of personal data owned by our company. The Policy is intended to be implemented in harmony with other policies, procedures and processes that our company has created for similar purposes. If there is any conflict between other policies or procedural texts that our Company has prepared for similar purposes, this Policy provisions shall be taken into consideration for the subjects related with processing of personal data.

Data Controller:

Karadeniz Holding A.Ş.
Merkez Mahallesi, Develi Caddesi, No:14, Kağıthane/Istanbul
Tel: +90 212 295 47 37
Fax: +90 212 295 47 43
İstanbul Registry of Commerce / Registration no: 99853
www.karadenizholding.com

APPENDIX - 1 ABBREVIATIONS

ABBREVIATIONS	
Notification of Clarification	Notification About Rules and Procedures to be Observed for Fulfilling Clarifying Obligation published in Official Gazette number 30356 on 10 th of March 2018
Constitution	Constitution of Republic of Turkey dated on 7 th of November 1982 with number 2709 published in Official Gazette number 17863 on 9 th of November 1982
Respected Person/ Respected Persons	It expresses the natural person(s) such as customers of Karadeniz Holding and/or Affiliates/Subsidiaries of Karadeniz Holding, employees that the company has a commercial relation, customers, business partners, shareholders, authorities, candidate employees, trainees, visitors, suppliers, employees and authorities of the organizations/sponsors/suppliers it cooperates, third persons including but not limited with other persons whose are not listed in this present document
Regulation About Deletion, Destruction or Anonymity of Personal Data	Regulation About Deletion, Destruction or Anonymity of Personal Data published in Official Gazette number 30224 on 28 th of October 2017 and entered into force on 1 st of January 2018
PDPA	Personal Data Protection Act entered into force due to its publishing in Official Gazette number 29677 on 7 th of April 2016 7
PDP Board	Board of Personal Data Protection
PDP Agency	Personal Data Protection Agency
Art.	Article
e.g.	For example
Policy	This present Karadeniz Holding A.Ş. Personal Data Protection and Privacy Policy
Company/Karadeniz Holding	Karadeniz Holding A.Ş.
Turkish Penal Code	Turkish Penal Code dated on 26 th of September 2004 with number 5237 published in Official Gazette number 25611 on 12 th of October 2004