

POLICY ON PROCESSING AND PROTECTION OF PERSONAL DATA OF EMPLOYEES

TÜNELMAK İŞ MAK. SAN. VE TİC.A.Ş. ("Company") attaches great importance to the confidentiality and protection of the personal data of its employees. The Company makes the necessary efforts for the best protection of personal data being processed by the Company within the technical possibilities.

The Policy on the Processing and Protection of Personal Data of Employees ("Policy") covers the data ("Employee Data") that are processed solely and directly by and under the control of the Company and that are or may be associated with current and former employees. Within the scope of this Policy, personal data and special categories of data shall be collectively referred to as "data" or "personal data", and all kinds of operations performed on data such as obtaining, recording, storing, preserving, modifying, reorganising, disclosing, making available, classifying or preventing the use of data in whole or in part, by automatic or non-automatic means shall be referred to as "data processing" or "processing".

This Policy has been prepared in order to inform the employees who are data owners within the scope of the activities carried out within the scope of the activities carried out within the Company, which personal data are processed in what form, purpose and duration and the rights they have as data owners and to provide a legal / legitimate system for personal data processing.

1. HOW IS PERSONAL DATA OF EMPLOYEES OBTAINED?

Personal data are obtained by the following methods for the purposes specified in the heading "For Which Purposes Does the Company Process Employee Personal Data?" and for the implementation of existing Company policies and procedures.

- 1.1. It is shared directly by the employee; it covers the data provided during job application, recruitment and continuation of the job.
- 1.2. It is derived and created in relation to the business processes in the continuation of the business relationship; it includes data such as job aptitude, performance evaluations, training records, task changes, title, business plan, meeting attendance information.
- 1.3. In the continuation of the employment relationship, it is created in matters other than labour processes; such as data on disciplinary processes, image recording with camera security systems, face reading system records, leave usage status,

2. WHAT DATA IS COLLECTED?

The data processed within the scope of the business relationship between the Company and the employee and which are considered personal data in accordance with the Personal Data Protection Law No. 6698 are listed in groups below. Unless otherwise explicitly stated, the term "personal data" covers the following information within the scope of the terms and conditions provided under this Policy.

- 2.1. Personal data; Name and surname, gender, marital status, identity information, Turkish ID number, date and place of birth, residence information, previous surname, contact information, education and training status, courses and seminars attended, certificate and professional qualification information, data in diploma and exit certificate or student certificate, graduation year and degree, foreign language knowledge, military service information, compulsory service obligations, compulsory services, computer information, driving licence information, company and sector name worked in the past, wage received, date of entry and exit, reason for exit, tax base, passport information, photograph, Employment Agency registration, travel disability / freedom.
- 2.2. Data on work and workplace practices; Position, title, department information and place of work, employment status, working hours, type and duration, wage, seniority and fringe benefits, work expenses /

salary allowances and details, individual pension contribution payment information, contribution amount change / suspension requests, date of employment, premium based earnings and premium amount, bank account information, other working conditions, job description, training plan/participation, targets, competency assessment results and grades in accordance with the quality standards to which it is subject, working performance and management evaluation information, work efficiency values calculated in unit time, criteria determined for work efficiency, compliance with work ethics and workplace rules, corporate culture, teamwork, communication and behaviour rules, motivation and desire, actions requiring workplace disciplinary punishment and the process carried out in this direction, information obtained within the scope of the process / legal-administrative evaluations about him/her, opinions and evaluations declared for subordinate personnel, Information related to work and workplace such as payroll/exit payroll information, compensation report, information on the department he/she works in, entry and exit times, tracking data on the vehicle in use, if any, images recorded by security cameras in the workplace and its annexes, leave usage, leave request reasons.

2.3. Data provided by the employee about family members, dependents and third parties: Data based on the family status notification of the spouse and children (spouse's name-surname, employment and income status; children's name-surname, TR ID numbers, birth dates, gender, custody status, education information), children's data in the birth certificate, data in the marriage certificate of the spouse, relatives working in the Company, name-surname, duty and contact information of the persons referred, parents' name in the Personnel Identity Card within the scope of the Personnel Workplace Personal Health file.

2.4. Data of special nature [All data processed under this heading are considered as personal data of general nature according to the legislation]; Religious data if included in identity documents, blood group data and information on criminal convictions and security measures in accordance with the archived criminal record requested during recruitment, physical ailments, disability status / reason, policy, report and health information needed for private health insurance (addendum information), health history, diagnosis and treatment details and amounts, biometric data provided through the face reading system for identifying the person and collected by systems for overtime tracking if there is an application in the relevant workplace / department.

3. FOR WHAT PURPOSES DOES THE COMPANY PROCESS EMPLOYEE PERSONAL DATA?

The Company processes the general and special categories of data of the employees primarily in cases explicitly stipulated in the laws, in cases where it is necessary to process the personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract, in cases where processing is mandatory for the Company to fulfil its legal obligations, in case the employee publicises his personal data personally, In the event that data processing is mandatory for the establishment, exercise or protection of a right, and provided that it does not harm the fundamental rights and freedoms of the employee, in the event that data processing is mandatory for the legitimate interests of the Company, provided that it does not harm the fundamental rights and freedoms of the employees, it processes limited to the legitimate purposes of these exceptions. In the presence of any of these cases, which constitute an exception to the main rule of obtaining the consent of the data subject in the personal data protection legislation, it is not necessary for the employee to have given consent for the processing of personal data.

In this context, the purposes of the Company in processing employee data are as follows:

1. Fulfilment of the obligations arising from the legislation,
2. Assessment of suitability for the position, company culture, general employee profile and working conditions,
3. Ensuring communication,
4. Execution of Human Resources Procedures, maintenance and development of effective employee management, as well as fulfilment of contractual obligations, including effective and accurate personnel management, career and organisational development decisions, job distribution, management of employee rights such as wages, premiums, retirement, health, insurance and leave,
5. Expense tracking and budgeting,
6. Monitoring assignments and determining the qualifications required for specific assignments, assessing the suitability of employees for other positions, making the necessary assessment to offer new job opportunities to employees and carrying out the recruitment / replacement process,
7. Evaluating the performance of the employees and in this direction, making evaluations regarding the continuity of the employment relationship and wages, premiums, bonuses and other compensation and benefits,
8. Training/meeting plans and follow-ups,
9. Monitoring the employee's compliance with the provisions of the legislation, contractual obligations, the Company's corporate culture and policies, business ethics, behaviour and communication rules, workplace customs, investigating, detecting, preventing, examining the violation and fulfilling the relevant legal requirements,
10. Ensuring, developing and maintaining occupational health and safety,
11. Fulfilment of management reporting needs,
12. Ensuring that the Company and the data subject exercise their rights arising from the legislation as an employee, including situations related to legal procedures or obtaining legal advice, and benefiting from the privileges and rights arising from the legislation in favour of the Company or the data subject,
13. Keeping, storing and preparing medical records and medical reports (for the purposes of tracking days off due to illness, calculating medical expenses and managing employee benefits, as well as determining the employee's fitness for work and making necessary adjustments to the workplace),
14. Conducting disciplinary investigations and conducting internal audit,
15. Monitoring of company personnel on employee attendance control systems for the purpose of safety and continuity of operation in the work environment,
16. Controlling the entry and exit of employees through doors and turnstiles in the system, adjusting working hours, ensuring work environment security, accessing employee information in case of emergency and authentication,
17. Fulfilment of the Company's obligations stipulated in the commercial contracts to which the Company is a party,
18. Conducting and maintaining corporate relations,
19. Collecting and processing the necessary documents regarding the opportunities and fringe benefits offered to employees directly or not directly related to the working relationship, organising campaigns, promotions, sweepstakes and similar events in favour of employees and their relatives and informing them, obtaining their opinions on surveys and voting,
20. Keeping a database of employee history after the termination of the employment relationship or using it as evidence in case of dispute,

21. Making the necessary assessment to offer new job opportunities to existing employees and realising the recruitment/job change process.

4. SECURITY

The Company takes reasonable measures to protect data against loss, misuse and unauthorised access, sharing, modification and deletion. Data are stored in secure physical areas and/or servers. Our employees will be able to access detailed regulations regarding the measures taken regarding Personal Data Security from the "Policy on Processing and Protection of Personal Data" on our Company's website (www.tunelmak.com.tr).

5. SPECIAL CASES

5.1. Monitoring

The use of the company's communication systems or equipment (company computers, mobile phones, e-mail accounts) by the employee shall be accepted only for business purposes, private communications should be made without using these communication systems or equipment, and private files should not be kept on company computers. As a matter of fact, the Company records usage logs via electronic mail, internet explorer, officecommunicator application, MS Office applications and MS Windows Operating System, and takes backups of the computers considering a possible loss. Likewise, it is possible that remote access to company computers and e-mail accounts may be provided by the employees of the service company from which technical support is received in case of a possible technical failure / malfunction. Likewise, if it becomes necessary to determine personal usage due to quota exceeding, the breakdown of the company mobile phone allocated to the employee can be examined.

The Company may provide access to vehicle tracking system records within the scope of the service provided by the service company and through this company, provided that it is limited to the purposes of security, detection of personal use outside of business purposes, adjudication of disciplinary investigations initiated on reasonable suspicion, prevention of unlawful acts through the use of this system and equipment / detection of acts and in any case, confirmation of compliance with workplace rules. The findings obtained in this way can be used as evidence in legal proceedings against employees or in disciplinary proceedings.

5.2. Security Cameras

In order to ensure security in the workplaces and annexes, there is a camera recording and monitoring system. These records are stored, monitored and audited by the Company. It is possible that these records may also be used to detect and prove non-compliance within the scope of a disciplinary investigation.

5.3. Workplace Personal Health File

A workplace personal health file is created for employees as stipulated by the occupational health and safety legislation, and health records that are sensitive data are kept within the scope of the file. In accordance with the occupational health and safety legislation, a copy of the files can be forwarded to these companies upon request by the Employers where the employees will start new jobs after the service contract is terminated.

5.4. Time Tracking

Systems that work through biometric data (face reading) are used in order to ensure healthy and easy tracking of employees' working hours and workplace security at the entrance and exit of the workplace.

5.5. Performance Data

In accordance with the quality standards to which the Company is subject, performance criteria, targets and performance evaluation results for employees who are subject to performance evaluation - in line with the requirements of the performance system - are accessible to line managers and the Human Resources unit. However, these data are not accessible to other employees and third parties who are not related to the company.

6. WITH WHOM IS THE DATA SHARED?

The Company may share the personal data of the employees with third parties and institutions for the realisation of any of the exceptions set out in Articles 5 and 6 of the Law and any of the purposes set out in this Policy. The transferred data, the purpose of transfer and the recipient persons and organisations are stated below;

RECIPIENT GROUP	TRANSFERRED DATA	PURPOSE OF TRANSFER
Bank	Identity information, payment item amount and qualifications, contact details	Fulfilment of legal and contractual obligations
Common Health and Safety Unit	Identity information, health records, contact information, information about the employee and family members included in the personnel identification card.	Fulfilment of legal and contractual obligations
Insurance Companies	Identity information, private pension contribution payment information, contribution amount change/interruption requests, date of employment-departure, premium-based earnings amount, all information on wages and premiums, payroll payments and deductions	Fulfilment of legal and contractual obligations
Companies visited in the field, managements operating in the places where the companies are established (Only certain personnel assigned to go to the external service)	Identity information, OHS training, employment declaration, health report, duty and title information	Ensuring the safety of the site, occupational health and safety, fulfilment of the Company's obligations stipulated in the commercial contracts to which the Company is a party
Cargo companies	Identity details, address information	Providing dispatch to the employee
Driving Courses (Only authorised to take drivers and driving licences. Certain personnel)	Driving licence and identity information, Graduation status, Contact information, Address information	To apply for professional qualification or Src certificates and similar documents
Travel Agencies(Only certain authorised personnel that we want to exit abroad	Identity information, contact information, address information, route information	Follow-up of visa, permit, travel and accommodation procedures for business trips of the employee.
Human Resources Companies	Identity information, passport information, past residence and work permit information	Follow-up and finalisation of residence and work permit applications on behalf of the employee in terms of foreign national personnel
Education Companies	Identity information, position and title, education information, professional qualifications	Making training plans for employees, completing training continuity and certification process
Companies that provide services/products by the	Identity information, position and title, project information for	Carrying out corporate relations

Company and companies that provide services/products to the Company	which he/she is responsible	
GSM Companies (identity information of our company official or owner when making an agreement or contract with GSM companies)	Identity information and telephone and line information allocated to him/her	Fulfilment of legal and contractual obligations
Tax advisors/auditors, Financial and legal advisors	Identity information, address information, title and grade information, personal records, disciplinary documents, date of entry and exit, premium based earnings, all information about wages and premiums, payroll payments and deductions	Fulfilment of legal and contractual obligations, exercise of legal rights, utilisation of privileges and rights arising from the Law
Public institutions and organisations authorised by law or private organisations instructed by them, judicial and enforcement authorities, prosecution and investigation authorities.	Data that will be required according to the nature of the transactions to be carried out for the protection of the right and in accordance with the legislation, and all personal data categorised above, which are in the possession of the Company in accordance with the request of the competent institutions, authorities and authorities	Fulfilment of legal and statutory obligations, protection of rights, benefiting from privileges and rights arising from the legislation, fulfilment of the requirements of requests from authorised institutions
Group Companies	Identity information, title and grade information, date of entry and exit, wage and premium information, work experience, performance data	Personnel management, career and organisational structuring, making effective and correct development decisions, follow-up of assignments

7. TRANSFER ABROAD

The name, surname, Turkish ID number and passport number of our employees who will be travelling on business and need to obtain a commercial visa are shared with these companies abroad in order to receive invitations from the companies they will visit. When necessary, separate clarification texts are notified to the employees in this situation and the processing activity is submitted to their written approval.

8. ABOUT YOUR RIGHT OF ACCESS TO YOUR DATA AND CORRECTION REQUESTS

Employees have the following rights regarding themselves by applying to the Company.

- To learn whether personal data is being processed,
- To request information if personal data has been processed,
- To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- To know the third parties to whom personal data are transferred domestically or abroad,
- To request correction of personal data in case of incomplete or incorrect processing,

- To request the deletion or destruction of personal data within the framework of the conditions stipulated in Law No. 6698,
- To request notification of the correction, deletion and destruction made in accordance with Law No. 6698 to third parties to whom personal data are transferred,
- To object to the emergence of a result to the detriment of the person himself/herself by analysing the processed data exclusively through automated systems,
- In case of damage due to unlawful processing of personal data, to request compensation for the damage

Employees will be able to submit their above-mentioned requests to the Company in writing.

- The application can be made by filling out our Personal Data Application Form at <https://tunelmak.com.tr> and submitting the request to Merve Mah. Necip Fazıl cad. No.20 Yenidoğan Sancaktepe Istanbul address with wet signature or by sending it to the following KEP address with secure electronic signature.

- Registered Electronic Mail (KEP) Address: tunelmakas@hs01.kep.tr

Pursuant to the above-mentioned requests, the Company may make its reasoned positive/negative response in writing or digitally. Requests submitted to the Company and having the qualifications required by the legislation will be finalised within 30 (thirty) days depending on the nature of the request and the result will be notified in writing or electronically in accordance with the feedback procedure selected in the request.

It is essential that no fee is charged for the necessary procedures regarding the requests. However, if the transactions require a cost, it is possible to charge a fee over the tariff determined by the Personal Data Protection Board ("Board") according to Article 13 of the Personal Data Protection Law No. 6698.

9. PERSONAL DATA STORAGE PERIOD

In the event that the provisions of the legislation to which the Company is subject do not stipulate/foresee a longer period of time;

9.1. Personal records are kept for 10 (ten) years from the beginning of the calendar year following the continuation and termination of the service contract.

9.2. Workplace personal health files, the content of which is determined by the Law and consisting of health records such as personnel identification card, examination records and reports, are kept for 15 (fifteen) years from the continuation and expiry of the service contract as required by the occupational health and safety legislation and in case of a possible occupational disease / work accident detection and notification.

9.3. Video recordings recorded with security cameras in the workplace are kept for 75 days (seventy-five days) from the date of recording. Afterwards, they are automatically deleted.

In cases where the employee works for the Company in intervals, the above-mentioned periods of 10 and 15 years will start to operate following the expiry of the last service period.

It is possible to access the Company's "Personal Data Retention and Destruction Policy" of the Company's "Personal Data Retention and Destruction Policy" for other details regarding the procedures and principles to be applied regarding the retention periods, deletion, destruction or anonymisation of personal data held by the Company in the capacity of data controller from our company website www.tunelmak.com.tr.

10. WHAT PRINCIPLES DOES THE COMPANY OBSERVE WHEN PROCESSING EMPLOYEE DATA?

The Company observes the following principles when processing employee data:

- Processing personal data in accordance with the law and good faith
- Correct processing of personal data
- The scope of the processing is certain
- Processing is carried out for legitimate purposes
- The processing is relevant, limited and proportionate to the purpose for which the data is collected or reprocessed
- Up-to-date data
- Retention of data for the period necessary for the purpose for which they are processed

11. OUR MEASURES AND COMMITMENTS REGARDING DATA SECURITY

The Company undertakes to protect the personal data of its employees in a secure manner. In order to prevent unlawful processing of personal data and access to data and to ensure the protection of personal data, it carries out technical and administrative measures to ensure the appropriate level of security by using various methods and security technologies. In addition, special categories of personal data are processed by taking adequate measures determined by the Board.

The Company shall not disclose the personal data obtained about the employees to anyone else in violation of the provisions of this Policy and the Law No. 6698 on the Protection of Personal Data and shall not use it for purposes other than processing. The Company declares that if personal data of employees are shared with outsourcing service providers in accordance with the provisions of this Policy, such outsourcing suppliers will also comply with the commitments under this article.

12. CHANGES TO BE REALISED ON THE POLICY

The Company may update and amend the provisions of this Policy by announcement/notification within the Company when necessary. Updates and amendments made by the Company in this Policy shall be effective as of the date of announcement/notification.

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