

PROCESSING AND PROTECTION OF PERSONAL DATA POLICY

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CHAPTER ONE

1.INTRODUCTION

1.1. Introduction

As TÜNELMAK İŞ MAK.SAN.VE TİC.A.Ş. ("Company"), we attach utmost importance to the processing and protection of personal data in accordance with the Law No. 6698 on the Protection of Personal Data ("Law") and we act with this care in all our planning and activities. With this awareness, we hereby present this Policy on Processing and Protection of Personal Data ("Policy") for your information in order to fulfil the obligation of disclosure under Article 10 of the Law and to inform you of all administrative and technical measures we have taken within the scope of processing and protection of personal data.

1.2. Purpose of the Policy

The main purpose of this Policy is to make explanations about the systems for the processing and protection of personal data in accordance with the law and the purpose of the Law, and in this context, to inform the persons whose personal data are processed by our Company, especially Company Stakeholders, Company Authorities, Company Business Partners, Employee Candidates, Visitors, Company and Group Company Customers, Potential Customers and Third Parties Customers, Suppliers. In this way, it is aimed to ensure full compliance with the legislation in the processing and protection of personal data carried out by our Company and to protect all rights of personal data owners arising from the legislation on personal data.

1.3. Scope of the Policy and Personal Data Subjects

This Policy has been prepared for the persons whose personal data are processed by our Company by automatic or non-automatic means provided that they are part of any data recording system, including Company Stakeholders, Company Officials, Company Business Partners, Employee Candidates, Visitors, Company and Group Company Customers, Potential Customers and Third Parties, Customers, Suppliers and will be applied within the scope of these specified persons. This Policy shall in no way apply to legal persons and legal person data.

Our Company informs the Personal Data Owners about the Law by publishing this Policy on its website. For the employees of our Company, the Personal Data Processing Policy for Employees will be applied. This Policy will not be applied if the data is not included in the scope of "Personal Data" within the scope specified below or if the Personal Data processing activity carried out by our Company is not by the means specified above. In this context, the personal data owners within the scope of this Policy are as follows:

Company Stakeholder	:	Real persons who are Stakeholders of the Company.
Company Real Person Business Partner	:	Real persons with whom the Company has any kind of business relationship.
Stakeholder, Officer, Employee of the Company's Business Partners	:	All real persons, including employees, Stakeholders and officials of real and legal persons (such as business partners, suppliers) with whom the Company has any kind of business relationship.
Company Official	:	Members of the Company's Board of Directors and other authorised real persons.
Employee Candidate	:	Real persons who have applied for a job to the Company by any means or who have opened their CV and related information to the Company's review.
Company Customer	:	Real persons who use or have used the products and services offered by the Company, regardless of whether they have any contractual relationship with the Company.
Group Company Customer	:	Natural persons who use or have used the products and services offered by the Company Group Companies, regardless of whether the Company has any contractual

		relationship with the Group Companies.
Potential Customer	:	Real persons who have made a request or interest in using the Company's products and services or who have been assessed to have this interest in accordance with commercial custom and honesty rules.
Visitor	:	All natural persons who enter the physical premises owned by the Company for various purposes or visit the websites for any purpose.
Third Person	:	Other natural persons who do not fall within the scope of the Personal Data Protection and Processing Policy prepared for Company Employees and who are not categorised as any personal data owner in this Policy.

1.4. Definitions

The terms used in this Policy shall have the meanings set out below:

Corporation/Company	:	TÜNELMAK İŞ MAK.SAN.VE TİC.A.Ş.
Personal Data	:	Any information relating to an identified or identifiable natural person.
Sensitive Personal Data	:	Race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, association, foundation or trade union membership, health, sexual life, criminal conviction and security measures and biometric and genetic data.
Processing of Personal Data	:	Any operation performed on Personal Data such as obtaining, recording, storing, preserving, modifying, reorganising, disclosing, transferring, taking over, making available, classifying or preventing the use of Personal Data by fully or partially automatic or non-automatic means provided that it is part of any data recording system.
Personal Data Owner/Related Person	:	Company Stakeholders, Company Business Partners, Company Officials, Employee Candidates, Visitors, Company and Group Company Customers, Potential Customers, Third Parties and persons whose personal data are processed by the company.
Group Company	:	Refers to the company/companies affiliated to the group to which the Company is affiliated.
Data Recording System	:	It refers to the registration request where personal data is structured and processed according to certain criteria.
Data Controller	:	It is the natural or legal person who determines the purposes and methods of processing personal data and is responsible for the establishment and management of the data recording system.
Data Processor	:	A natural or legal person who processes personal data on behalf of the data controller based on the authorisation granted by the data controller.
Open Consent	:	It is the consent related to a specific subject, based on information and expressed with free will.
Anonymisation	:	It is the process of making the data, which was previously associated with a person, impossible to be associated with an identified or identifiable natural person under any circumstances, even by matching with other data.
Law	:	Law No. 6698 on the Protection of Personal Data.
PPD Board	:	Personal Data Protection Board.

1.5. Enforcement of the Policy

This Policy, which was issued by the Company and entered into force on 01.12.2019, was updated on 10.12.2019 and published on the Company's website www.tunelmak.com.tr and made available to the relevant persons upon request of the Personal Data Owners.

CHAPTER TWO

2. PROCESSING AND TRANSFER OF PERSONAL DATA

2.1. General Principles for Processing Personal Data

Personal Data is processed by the Company in accordance with the procedures and principles stipulated in the Law and this Policy. The Company acts in accordance with the following principles when processing Personal Data:

- Personal Data is processed in accordance with the relevant rules of law and the requirements of good faith.
- It is ensured that Personal Data is accurate and up-to-date. In this context, issues such as determining the sources from which the data are obtained, confirming their accuracy, and evaluating whether they need to be updated are carefully considered.
- Personal Data are processed for specific, explicit and legitimate purposes. The legitimacy of the purpose means that the Personal Data processed by the Company is related to and necessary for the work it has done or the service it provides.
- Personal Data is related to the purpose in order to fulfil the purposes determined by the Company, and the processing of Personal Data that is not related to the realisation of the purpose or is not needed is avoided. It limits the processed data only to what is necessary for the realisation of the purpose. Personal Data processed within this scope are relevant, limited and proportionate to the purpose for which they are processed.
- If there is a period stipulated in the relevant legislation for the storage of data, it complies with these periods; otherwise, it retains Personal Data only for the period required for the purpose for which they are processed. In the event that there is no valid reason for further retention of Personal Data, such data shall be deleted, destroyed or anonymised.

2.2. Conditions for Processing Personal Data

The Company does not process Personal Data without the explicit consent of the data subject. In the presence of one of the following conditions, Personal Data may be processed without the explicit consent of the data subject.

- The Company may process the Personal Data of Personal Data Owners in cases expressly stipulated in the laws even without explicit consent. For example; In accordance with Article 230 of the Tax Procedure Law, the explicit consent of the relevant person will not be sought in order to include the name of the relevant person on the invoice.
- Personal Data may be processed without explicit consent in order to protect the life or physical integrity of the person or another person who is unable to disclose his/her consent due to actual impossibility or whose consent cannot be recognised as valid. For example, in a situation where the person is unconscious or mentally ill and his/her consent is not valid, the Personal Data of the Personal Data Owner may be processed during medical intervention in order to protect his/her life or body integrity. In this context, data such as blood type, previous diseases and surgeries, medicines used can be processed through the relevant health system.
- Provided that it is directly related to the establishment or performance of a contract by the Company, Personal Data of the parties to the contract may be processed. For example, the account number information of the creditor party may be obtained for the payment of the money in accordance with a contract concluded.
- The Company may process the Personal Data of Personal Data Owners if it is mandatory in order to fulfil its legal obligations as a data controller.

- The Company may process the Personal Data of the Personal Data Owners made public by the Company itself, in other words, the Personal Data disclosed to the public in any way, since the legal benefit to be protected has disappeared.
- The Company may process the Personal Data of Personal Data Owners without seeking explicit consent in cases where data processing is mandatory for the exercise or protection of a legitimate legal right.
- The Company may process the Personal Data of Personal Data Owners in cases where the processing of Personal Data is mandatory for the provision of legitimate interests, provided that it does not harm the fundamental rights and freedoms of Personal Data Owners protected under the Law and Policy. The Company shows the necessary sensitivity to comply with the basic principles regarding the protection of Personal Data and to observe the balance of interests of Personal Data Owners.

2.3. Conditions for Processing Special Categories of Personal Data

The Company does not process Special Categories of Personal Data without the explicit consent of the data subject. However, Personal Data other than health and sexual life may be processed without the explicit consent of the person concerned in cases stipulated by law. Personal Data related to health and sexual life are processed by the Company only for the purpose of protecting public health, preventive medicine, medical diagnosis and treatment and care services, planning and management of health services and financing, without seeking the explicit consent of the person concerned under the conditions that we are under the obligation of confidentiality. The Company carries out the necessary procedures to take adequate measures determined by the Board in the processing of Special Categories of Personal Data.

2.4. Conditions of Transfer of Personal Data

Our Company may transfer Personal Data and Sensitive Personal Data of Personal Data Owners to third parties in accordance with the Law by establishing the necessary confidentiality conditions and taking security measures in line with the purposes of processing Personal Data. Our Company acts in accordance with the regulations stipulated in the Law during the transfer of Personal Data. In this context, in line with the legitimate and lawful Personal Data processing purposes, our Company may transfer Personal Data to third parties based on and limited to one or more of the Personal Data processing conditions specified in Article 5 of the Law under the following conditions:

- If there is explicit consent of the Personal Data owner;
- If there is a clear regulation in the laws regarding the transfer of Personal Data, if it is mandatory for the protection of the life or physical integrity of the Personal Data owner or someone else; and
- If the Personal Data owner is unable to disclose his/her consent due to actual impossibility or if his/her consent is not legally valid,
- If it is necessary to transfer the Personal Data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract,
- If Personal Data transfer is mandatory for our company to fulfil its legal obligation,
- If the Personal Data has been made public by the Personal Data owner,
- If the transfer of Personal Data is mandatory for the establishment, exercise or protection of a right,
- Provided that it does not harm the fundamental rights and freedoms of the Personal Data owner, it may transfer Personal Data if it is mandatory for the legitimate interests of our Company.

2.4.1. Conditions for Transferring Personal Data Abroad

Our Company may transfer Personal Data and Sensitive Personal Data of Personal Data Owners to third parties abroad by taking necessary security measures in line with the purposes of processing Personal Data. Personal Data may be transferred by our Company to foreign countries declared to have adequate protection by the PDP Board or, in the absence of adequate protection, to foreign countries where the data controllers in Turkey and the relevant foreign country undertake adequate protection in writing and where the PDP Board has authorisation.

2.5. Conditions for Transfer of Special Categories of Personal Data

The Company may transfer the Special Categories of Personal Data of the Personal Data Owner to third parties in the following cases in line with the legitimate and lawful Personal Data processing purposes by taking due care, taking the necessary security measures and taking adequate measures stipulated by the PDP Board.

- (i) In case of explicit consent of the Personal Data Owner or
- (ii) In the presence of the following conditions, without seeking the explicit consent of the Personal Data Owner;
- (iii) Personal Data of Special Nature other than the health and sexual life of the Personal Data Owner (race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, association, foundation or trade union membership, criminal conviction and security measures, and biometric and genetic data), in cases stipulated by law,
- (iv) Personal Data of Special Nature related to the health and sexual life of the Personal Data Owner only for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, by persons or authorised institutions and organisations under the obligation of confidentiality.

2.5.1. Transfer of Special Categories of Personal Data Abroad

The Company may transfer the Sensitive Personal Data of the Personal Data Owner to foreign countries where the data controller has adequate protection or undertakes adequate protection in the following cases in line with the legitimate and lawful Personal Data processing purposes by taking due care, taking the necessary security measures and taking adequate measures stipulated by the KVK Board.

- (i) In case of explicit consent of the Personal Data Owner or
- (ii) In the presence of the following conditions, without seeking the explicit consent of the Personal Data Owner;
- (iii) Personal Data of Special Nature other than the health and sexual life of the Personal Data Owner (race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, association, foundation or trade union membership, criminal conviction and security measures, and biometric and genetic data), in cases stipulated by law,
- (iv) Personal Data of Special Nature related to the health and sexual life of the Personal Data Owner only for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, by persons or authorised institutions and organisations under the obligation of confidentiality.

CHAPTER THREE

3. PURPOSES OF PROCESSING AND TRANSFER OF PERSONAL DATA, PERSONS TO WHOM PERSONAL DATA WILL BE TRANSFERRED

3.1. Purposes of Processing and Transferring Personal Data

Personal Data are processed within the scope of the personal data processing conditions specified in Articles 5 and 6 of the Law, limited to the purposes of the Company in accordance with the law and the purpose of the Law.

- Optimal planning and implementation of human resources policies,
- Proper planning, execution and management of commercial partnerships and strategies,
- Ensuring the legal, commercial and physical security of itself and its business partners,
- Ensuring corporate functioning, planning and execution of management and communication activities,
- Ensuring that Personal Data Owners benefit from the products and services in the best way possible and recommending them by customising them according to their demands, needs and requests,
- Ensuring data security at the highest level,
- Improvement of the services offered on the website and elimination of errors on the website,

- Contacting the Personal Data Owners who submit their requests and complaints to it and ensuring the management of requests and complaints,
- Event management,
- Management of relationships with business partners or suppliers,
- Execution of personnel recruitment processes,
- Supporting the personnel recruitment processes of Group Companies and compliance with the relevant legislation,
- Planning and execution of audit activities to ensure that the activities of the Group Companies are carried out in accordance with the relevant legislation,
- Supporting the planning and execution processes of the fringe benefits and benefits to be provided to the senior executives of the Company and Group Companies,
- Assisting Group Companies in the realisation of corporate and partnership law transactions,
- Execution/follow-up of financial reporting and risk management transactions,
- Execution/follow-up of company legal affairs,
- Carrying out activities to protect its reputation,
- Managing investor relations,
- Providing information to authorised institutions due to legislation,
- Creation and follow-up of visitor records.

In the event that the processing activity carried out for the aforementioned purposes does not meet any of the conditions stipulated under the Law, your explicit consent is obtained by the Company regarding the relevant processing process.

3.2. Persons to whom Personal Data will be Transferred

Personal Data, in order to ensure that the services provided to you are complete and flawless and only to the extent appropriate to the nature of the service, our business and solution partners, banks , Health and safety organisations , Insurance companies , Companies you can visit in the field , Cargo companies , Driving courses , Pharmacies , Travel agencies , Human resources companies , Training companies , GSM companies , tax and financial legal advisors, our Group companies, companies that provide service products by the company and companies that provide service products to the company, public institutions and organisations authorised by law or private institutions instructed by them, judicial and enforcement authorities, authorities competent for prosecution and investigation, and third parties who perform technical, logistics and other similar operations on our behalf. These third parties are the persons who are obliged to access the relevant information in order to provide full and perfect services.

Apart from these, your Personal Data may be transferred -limited only to the relevant person or institution- in cases such as the need to share data with other third parties in order to provide the service fully and flawlessly, it is mandatory for the Company to fulfil its legal obligations, it is expressly stipulated in the laws or there is a judicial / administrative order issued in accordance with the law.

Anonymised data is information that cannot be matched with our visitors/customers and does not contain your identity information or make your identity identifiable. Your confidentiality is guaranteed in anonymised data.

CHAPTER FOUR

4.METHOD AND LEGAL GROUNDS FOR COLLECTION OF PERSONAL DATA, DELETION, DESTRUCTION AND ANONYMISATION OF PERSONAL DATA AND STORAGE PERIOD

4.1. Method and Legal Grounds for Collecting Personal Data

For the purpose of auditing the compliance with Article 1 regulating the purpose of the Law and Article 2 regulating the scope of the Law, Personal Data is collected by all kinds of verbal, written, electronic, technical and other methods, such as the Company's website, in various ways, in order to fulfil the responsibilities arising from the law within the framework of legislation, contract, request and request-

based legal reasons in order to fulfil the purposes set out in the Policy, and is processed by the Company or data processors assigned by the Company.

4.2. Deletion and Destruction of Personal Data

Without prejudice to the provisions of other laws regarding the destruction of Personal Data, the Company destroys Personal Data ex officio or upon the request of the data owner in the event that the reasons requiring its processing disappear, although it has processed it in accordance with the provisions of this Law and other laws. Destruction of Personal Data refers to the destruction of materials suitable for storing data such as documents, files, CDs, diskettes, hard discs, etc. in which the data is recorded in such a way that the information cannot be recovered and used again.

4.3. Retention Period of Personal Data

The Company stores Personal Data for the period specified in this legislation, if stipulated in the legislation. If a period of time is not regulated in the legislation on how long personal data should be kept, Personal Data is processed for the period required to be processed in accordance with the practices and customs of the Company's practices and commercial life, depending on the activity carried out by the Company while processing that data, and then deleted, destroyed or anonymised.

If the purpose of processing personal data has ended and the retention periods determined by the relevant legislation and the Company have expired, personal data may only be stored for the purpose of constituting evidence in possible legal disputes or for the assertion or defence of the relevant right related to personal data. In the establishment of the periods here, the retention periods are determined based on the statute of limitations for the assertion of the right in question and the examples in the requests previously addressed to the Company on the same issues despite the expiration of the statute of limitations. In this case, the stored personal data are not accessed for any other purpose and access to the relevant personal data is provided only when it is required to be used in the relevant legal dispute. After the aforementioned period expires, personal data are deleted, destroyed or anonymised.

Detailed regulations regarding the Company's techniques regarding the storage, deletion, destruction and anonymisation of Personal Data are included in the Company's Personal Data Retention and Destruction Policy.

CHAPTER FIVE

5. ISSUES REGARDING THE PROTECTION OF PERSONAL DATA

In accordance with Article 12 of the Law, the Company takes the necessary technical and administrative measures to ensure the appropriate level of security in order to prevent unlawful processing of the Personal Data it processes, to prevent unlawful access to the data and to ensure the preservation of the data, and conducts or has the necessary audits carried out within this scope.

5.1. Ensuring the Security of Personal Data

5.1.1. Technical and Administrative Measures Taken to Ensure Lawful Processing of Personal Data

The Company takes technical and administrative measures to ensure that Personal Data is processed in accordance with the law, according to technological possibilities and implementation cost.

(i) Technical Measures Taken to Ensure Lawful Processing of Personal Data

The main technical measures taken by the Company to ensure the lawful processing of Personal Data are listed below:

- Personal Data processing activities carried out within the Company are audited by technical and manual systems.
- The measures taken are periodically reported to the relevant person in accordance with the internal audit mechanism.
- Qualified personnel are employed.

(ii) Administrative Measures Taken to Ensure Lawful Processing of Personal Data

The main administrative measures taken by the Company to ensure the lawful processing of Personal Data are listed below:

- Employees are informed and trained about the law on the protection of Personal Data and the processing of Personal Data in accordance with the law.
- All activities carried out by the Company are analysed in detail for all business units, and as a result of this analysis, Personal Data processing activities are revealed for the activities carried out by the relevant business units.
- Personal Data processing activities carried out by the business units of the Company; The requirements to be fulfilled in order to ensure that these activities comply with the Personal Data processing conditions required by the Law are determined specifically for each business unit and the detailed activity it carries out.
- In order to ensure the legal compliance requirements determined on a business unit basis, awareness is created and implementation rules are determined for the relevant business units; the necessary administrative measures are implemented through internal policies and trainings to ensure the control of these issues and the continuity of the implementation.
- In the contracts and documents governing the legal relationship between the Company and the employees, records that impose the obligation not to process, disclose and use Personal Data, except for the Company's instructions and exceptions imposed by law, are included in the contracts and documents governing the legal relationship between the Company and the employees, and the obligations arising from the Law are fulfilled by raising employee awareness and conducting audits.

5.1.2. Technical and Administrative Measures Taken to Prevent Unlawful Access to Personal Data

The Company takes technical and administrative measures according to the nature of the data to be protected, technological possibilities and cost of implementation in order to prevent imprudent or unauthorised disclosure, access, transfer or any other unlawful access to Personal Data.

(i) Technical Measures Taken to Prevent Unlawful Access to Personal Data

The main technical measures taken by the Company to prevent unlawful access to Personal Data are listed below:

- Access and authorisation technical solutions are implemented in accordance with the legal compliance requirements determined on a business unit basis.
- Access authorisations are restricted and authorisations are regularly reviewed.
- The technical measures taken are periodically reported to the relevant person in accordance with the internal audit mechanism, the issues that pose a risk are re-evaluated and the necessary technological solutions are produced.
- Virus protection systems, software and hardware are installed.
- Knowledgeable personnel are employed.
- Security scans are regularly performed to identify security vulnerabilities in applications where Personal Data is collected. It is ensured that the vulnerabilities found are closed.

(ii) Administrative Measures to Prevent Unlawful Access to Personal Data

The main administrative measures taken by the Company to prevent unlawful access to Personal Data are listed below:

- Employees are trained on the technical measures to be taken to prevent unlawful access to Personal Data.
- Personal Data access and authorisation processes are designed and implemented within the Company in accordance with the legal compliance requirements for processing Personal Data on a business unit basis.
- Employees are informed that they cannot disclose the Personal Data they have learnt to others in violation of the provisions of the Law and cannot use them for purposes other than processing, and that this obligation will continue after their resignation and necessary commitments are obtained from them in this direction.

- In the contracts concluded by the Company with the persons to whom Personal Data are transferred in accordance with the law; Provisions are added that the persons to whom Personal Data are transferred will take the necessary security measures to protect Personal Data and ensure that these measures are complied with in their own organisations.

5.1.3. Storing Personal Data in Secure Environments

The Company takes necessary administrative measures according to the cost of implementation in order to store Personal Data in secure environments and to prevent its destruction, loss or alteration for unlawful purposes.

(i) Technical Measures Taken for Storing Personal Data in Secure Environments

The main technical measures taken by the Company to store Personal Data in secure environments are listed below:

- Expert staff are employed in technical matters.
- Technical security systems are installed for storage areas, security tests and researches are carried out to identify security vulnerabilities, and existing or potential risk issues identified as a result of the tests and researches are eliminated. The technical measures taken are periodically reported to the relevant person in accordance with the internal audit mechanism.
- Back-up programmes are used in accordance with the law to ensure that Personal Data is stored securely.
- Access to the media where Personal Data is stored is restricted and only authorised persons are allowed to access this data limited to the purpose for which the personal data is stored.

(ii) Administrative Measures Taken for Storing Personal Data in Secure Environments

The main administrative measures taken by the Company to store Personal Data in secure environments are listed below:

- Employees are trained to ensure that Personal Data is stored securely.
- Legal and technical consultancy services are obtained in order to follow the developments in the field of information security, privacy of private life and protection of personal data and to take necessary actions.
- In the event that an external service is obtained by the Company due to technical requirements for the storage of Personal Data, the contracts concluded with the relevant companies to which Personal Data is transferred in accordance with the law include provisions stating that the persons to whom Personal Data is transferred will take the necessary security measures to protect Personal Data and ensure that these measures are complied with in their own organisations.

5.1.4. Supervision of Measures Taken for the Protection of Personal Data

In accordance with Article 12 of the Law, the Company carries out or has the necessary audits carried out within its own organisation. The results of these audits are reported to the relevant department within the scope of the internal functioning of the Company and necessary actions are taken to improve the measures taken.

5.1.5. Measures to be taken in case of unauthorised disclosure of personal data

The Company operates a system that ensures that if the Personal Data processed in accordance with Article 12 of the Law is obtained by others illegally, this situation is notified to the relevant Personal Data Owner and the PDP Board as soon as possible. If deemed necessary by the PDP Board, this situation may be announced on the website of the PDP Board or by another method.

5.2. Observing the Legal Rights of Personal Data Subjects

The Company observes all legal rights of Personal Data Owners with the implementation of the Policy and the Law and takes all necessary measures to protect these rights. Detailed information on the rights of Personal Data Owners is provided in the sixth section of this Policy.

5.3. Protection of Special Categories of Personal Data

The Law attributes special importance to certain Personal Data due to the risk of causing victimisation and/or discrimination when processed unlawfully. These data include race, ethnic origin, political opinion,

philosophical belief, religion, sect or other beliefs, appearance and dress, association, foundation or trade union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data. The Company shows maximum sensitivity to the protection of special quality Personal Data, which is determined as "special quality" by the Law and processed in accordance with the law. In this context, the technical and administrative measures taken by the Company for the protection of personal data are also implemented with the utmost care in terms of Special Categories of Personal Data and necessary audits are provided within the Company in this regard.

CHAPTER SIX

6. RIGHTS OF THE PERSONAL DATA OWNER, EXERCISE AND EVALUATION OF RIGHTS

6.1. Informing the Personal Data Owner

In accordance with Article 10 of the Law, the Company informs Personal Data Owners during the collection of Personal Data. In this context, if any, the identity of the Company representative, the purpose for which Personal Data will be processed, to whom and for what purpose the processed Personal Data can be transferred, the Method and Legal Grounds for Collecting Personal Data and the rights of the Personal Data Owner.

6.2. Rights of the Personal Data Owner in accordance with the LPPD

The Company informs you of your rights pursuant to Article 10 of the Law; provides guidance on how to exercise such rights and carries out the necessary internal functioning, administrative and technical arrangements for all these. Pursuant to Article 11 of the Law, the Company explains to the persons whose Personal Data are received that they have the following rights.

- To learn whether Personal Data is processed or not,
- To request information if their 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 is 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 Article 7 of the Law,
- To request notification of the transactions made pursuant to subparagraphs (d) and (e) of Article 11 of the Law 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 demand the compensation of the damage

6.3. Cases where the Personal Data Owner cannot assert his/her rights

Since the following cases are excluded from the scope of the Law pursuant to Article 28 of the Law, Personal Data Owners cannot assert their rights listed in Article (6.2.) of this Policy in the following cases:

- Processing of Personal Data by natural persons within the scope of activities related to themselves or their family members living in the same residence, provided that they are not disclosed to third parties and the obligations regarding data security are complied with.
- Processing of Personal Data for purposes such as research, planning and statistics by anonymising them with official statistics.
- Processing of Personal Data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defence, national security, public security, public order, economic security, privacy of private life or personal rights or does not constitute a crime.
- Processing of Personal Data within the scope of preventive, protective and intelligence activities carried out by public institutions and organisations entrusted and authorised by law to ensure national defence, national security, public safety, public order or economic security.

- Processing of Personal Data by judicial authorities or execution authorities in relation to investigation, prosecution, trial or execution procedures.

Pursuant to Article 28/2 of the Law, in the cases listed below, Personal Data Owners cannot assert their rights listed in Article (6.2.) of this Policy, except for the right to claim compensation for damages:

- Processing of Personal Data is necessary for the prevention of crime or criminal investigation.
- Processing of personal data made public by the Personal Data Owner himself/herself.
- Processing of Personal Data is necessary for the execution of supervisory or regulatory duties and disciplinary investigation or prosecution by the public institutions and organisations and professional organisations in the nature of public institutions based on the authority granted by the law.
- Personal Data processing is necessary for the protection of the economic and financial interests of the State in relation to budget, tax and financial matters.

6.4. Exercise of Rights by Personal Data Owner

Personal Data Owners will be able to submit their requests regarding their rights listed in Article (6.2.) of this Policy to the Company free of charge by filling out and signing the Application Form, which can be accessed from the link www.tunelmak.com.tr, with the information and documents that will identify their identities and the methods specified below or other methods determined by the KVK Board:

- (i) After the application form is filled in, a wet signed copy of the application form should be sent to Merve Mah. Necip Fazıl cad. No.20 Yenidoğan Sancaktepe ISTANBUL.

In order for third parties to make an application request on behalf of personal data owners, there must be a special power of attorney issued by the data owner through a notary public on behalf of the applicant.

6.5. Procedure and Duration of the Company's Response to Applications

The Company shall finalise the requests in the application free of charge as soon as possible, within 30 (thirty) days at the latest, depending on the nature of the request. However, if the transaction in question requires an additional cost, the fee in the tariff determined by the PDP Board may be charged. The Company may accept the request or reject it by explaining its reasoning and notifies its response in writing or electronically. If the request in the application is accepted, the Company fulfils the requirements of the request.

6.6. Personal Data Owner's Right to File a Complaint to the PDP Board

In cases where the application is rejected, the response is found insufficient or the application is not responded to in due time; the data subject has the right to file a complaint to the PDP Board within thirty days from the date of learning the response and in any case within sixty days from the date of application.

CHAPTER SEVEN

7. MANAGEMENT STRUCTURE OF THE COMPANY IN ACCORDANCE WITH THE POLICY ON PROCESSING AND PROTECTION OF PERSONAL DATA

A Personal Data Committee has been established within the Company in accordance with the decision of the Company's senior management to manage this Policy and other policies related and related to this Policy. The Personal Data Committee is authorised and responsible for taking the necessary actions for the storage and processing of the data of the Personal Data Owners in accordance with the law, this Policy and other policies related and related to this Policy. The Personal Data Retention and Destruction Policy published on the Company's website contains detailed regulations regarding the persons assigned to the Personal Data Committee and their duties.

CHAPTER EIGHT

8. UPDATE, HARMONISATION AND CHANGES

8.1. Update and Harmonisation

The Company reserves the right to make changes in this Policy and other policies related and related to this Policy due to amendments to the Law, in accordance with the decisions of the PDP Board or in line with the developments in the sector or in the field of informatics.

Amendments to this Policy are immediately incorporated into the text and explanations regarding the amendments are explained at the end of the Policy.

8.2. Amendments

01.12.2019 : Personal Data Processing and Protection Policy has been prepared and will be published.

10.12.2019 : Updates

**there is no older dated amendment.*