

ELEKTRİK TESİSLERİ MÜHENDİSLİK MÜTEAHHİTLİK DANIŞMANLIK VE TİCARET A.Ş. POLICY ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

1. INTRODUCTION

Elektrik Tesisleri Mühendislik Müteahhitlik Danışmanlık ve Ticaret A.Ş. (“Company”) and its affiliates pay maximum attention to the protection of personal data and take all necessary measures to protect the rights of personal data owners under the Constitution of the Turkish Republic and Law No. 6698 on the Protection of Personal Data (“LPPD”).

This policy is prepared in order to set out the principles and rules in implementing the provisions of LPPD on data processing and protection that will be followed by the Company and its affiliates.

This policy may be periodically updated when necessary in order to be in compliance with LPPD and secondary regulations. Modifications will be posted on the Company’s website.

2. PURPOSES OF PROCESSING PERSONAL DATA BY THE COMPANY

Personal data are processed by the Company in order to protect the fundamental rights and freedoms of data owners, foremost the right to privacy and the right to information.

With this policy, the Company aims to organize, internalize and ensure compliance with the provisions of the LPPD and processing of personal data.

The Company will take the necessary measures to comply with the LPPD, make its practices in line with the LPPD and endeavor to create awareness on this matter.

In this context, personal data are processed by the Company for the following purposes:

- Planning and execution of the Company’s advertising activities,
- General and specific campaigns, offers, product and service promotions related to the products and services provided by the Company,
- Planning and execution of the Company’s corporate communication,
- Planning and execution of corporate sustainability activities,
- Managing recruitment processes of the Company,
- Execution and monitoring of risk management activities of the Company,
- Execution and monitoring of legal and accounting activities of the Company,
- Execution of management activities of the Company,
- Market surveys,
- Customer satisfaction, managing customer requests and complaints,
- Preparing and monitoring visitor records.

3. PRINCIPLES CONCERNING THE PROCESSING OF PERSONAL DATA

The principles to be followed by the Company in processing personal data are provided below under different headings.

3.1. THE PRINCIPLE OF LAWFULNESS AND FAIRNESS

In accordance with the principle of law-abidance and integrity, the Company should take into consideration the interests of data owners and their reasonable expectations when trying to fulfill its purposes with data processing. The Company should also carry out its operations in a transparent manner, act in accordance with its obligations to inform and notify, and should process data only to the extent that it is need.

3.2. THE PRINCIPLE OF BEING ACCURATE AND UP TO DATE

The Company ensures that personal data are stored accurately and that they are up to date, and takes the necessary measures accordingly. In this context, the Company has established a system for correcting, confirming and updating the personal data of personal data owners.

3.3. THE PRINCIPLE OF PROCESSING DATA FOR SPECIFIED, EXPLICIT AND LEGITIMATE PURPOSES

The Company processes personal data in a specific manner that is legitimate and lawful, and openly and clearly defines its purpose for processing data before doing so.

3.4. THE PRINCIPLE OF PERSONAL DATA PROCESSING BEING RESTRICTED, PROPORTIONAL AND LIMITED TO THE PURPOSE

The Company processes data in a convenient manner that is proportional and refrains from processing personal data that are not related to or needed for achieving the purpose. Additionally, the processed data are limited to the data necessary for fulfilling the purpose.

3.5. THE PRINCIPLE OF STORING DATA FOR THE PERIOD PROVISIONED IN THE RELEVANT REGULATION OR NECESSARY FOR THE PROCESSING PURPOSE

The Company follows the time period provisioned by law, if any, and if there is no such provision, stores personal data as long as necessary for the processing purpose. The data are erased, destroyed or anonymized at the end of the time period provisioned by law, if any, or otherwise at the end of the period necessary for the processing purpose.

The Company does not store personal data based on the fact that the data might be used again or for any other reason.

4. CONDITIONS FOR PROCESSING PERSONAL DATA

4.1. PROCESSING PERSONAL DATA

Personal data are processed by the Company in accordance with the personal data processing conditions provided in Article 5 of the LPPD. In this context, when carrying out data processing activities, the Company and its affiliates evaluate whether or not the activity conforms with the conditions and terminates data processing activities that do not conform with any of the conditions.

4.2. PROCESSING OF SPECIAL PERSONAL DATA

Pursuant to Article 6 of the LPPD, special personal data are data concerning race, ethnic origin, political opinion, philosophical belief, religion, denomination or other beliefs, appearance, membership in associations or foundations, health, sexual life, criminal conviction and security measures as well as biometric and genetic data.

The Company and its affiliates show special care and attention to the protection of data that are deemed as “special personal data” in the LPPD. Special personal data are not processed by the Company without the explicit consent of the data owner.

5. OBLIGATIONS OF THE COMPANY

5.1. OBLIGATION TO INFORM THE DATA OWNER

The Company is obliged to inform data owners whose data will be processed at the time of obtaining the personal data.

Pursuant to Article 10 of the LPPD, the Company informs data owners about:

- The identity of the Company as the data controller and its representative, if any,
- The purpose for processing data,
- To whom and for what purposes data can be transferred,
- The method and legal basis of data collection,
- The data owner's rights under the LPPD Article

11.

5.2. OBLIGATIONS CONCERNING THE SECURITY OF PERSONAL DATA

Pursuant to Article 12 of the LPPD, the Company should take all necessary technical and administrative measures to ensure an appropriate level of security in line with the following purposes:

- Prevent unlawful processing of personal data,
- Prevent unlawful access to personal data,
- Ensure protection of

personal data.

If the Personal Data Protection Board ("Board") makes more detailed regulations and creates new obligations, the Company shall show the necessary effort to comply with these obligations and take the necessary technical and administrative measures.

The Company conducts and procures the necessary supervisions within the Company to ensure compliance with the LPPD provisions. The necessary organizational structure is established by the Company.

The Company and its affiliates take the following technical and administrative measures in order to process personal data in accordance with the law:

- The Company and its affiliates analyze all data processing activities and accordingly provide a "personal data processing map."
- Personal data processing processes are supervised by technical methods and reported to the relevant person.
- Company employees are informed and educated on lawful processing of personal data and about the legal implications of unlawful processing of personal data.
- Periodic audits are carried out to raise employees' awareness concerning the protection and processing of personal data.
- The Company sets provisions on the privacy of agreements and other documents determining the legal relationship between the Company and its employees, subsidiaries, affiliates, suppliers and customers, and of the personal data shared with them, and on how these data will be stored and processed.
- The Company limits access to personal data to employees explicitly authorized for data processing. Company employees have limited access to personal data they do not use within the scope of their work.

The Company and its affiliates take the following technical and administrative measures in order to prevent the unlawful processing of personal data:

- Technical measures are taken and updated periodically to prevent access by unauthorized persons to the system and locations where personal data is stored.
- The technical measures taken are periodically reported to the relevant person.
- Software and hardware including virus protection systems and firewalls necessary to ensure the protection of personal data are set up by the Company.
- The Company employs technical personnel to handle the technical measures preventing unlawful access to personal data.
- The Company and its affiliates require their employees to sign commitment agreements, to be valid even after leaving the Company, stating that they shall not disclose personal data they have obtained due to their work, against the provisions of the LPPD, or use them for any other purpose than their processing purpose.

5.3. RESPONSE TO APPLICATIONS BY RELEVANT PERSONS AND THE OBLIGATION OF FULFILLING BOARD RESOLUTIONS

Personal data owners can convey their requests regarding the implementation of the LPPD to the Company, in writing or any other form specified by the Board.

The Company shall finalize requests regarding the implementation of the LPPD conveyed by personal data owners in writing or in any other form specified by the Board, free of charge within the shortest time and within 30 (thirty) days at the latest. However, if the transaction requires an additional cost to be incurred, then the Company can demand the fee set by the Board from the applicant personal data owner.

The Company can accept the request of the data owner or refuse it together with justified grounds, and shall convey its response to the relevant person either in writing or electronically. If the Company accepts the request presented in the application, the Company shall take the necessary actions. If the application was caused by a fault on the Company's side, the collected fee shall be returned to the relevant person.

In the event of the application being rejected by the Company, the answer being unsatisfactory or no answer being provided within the time period, the relevant person can make a complaint to the Board within 30 (thirty) days after learning of the Company's answer or in any case within 60 (sixty) days following the application date.

5.4. OBLIGATION TO REGISTER WITH THE DATA CONTROLLERS' REGISTRY

Before beginning data processing, the Company shall register with the Data Controllers' Registry with the information and documents stated in the LPPD, within the period determined and announced by the Board.

6. RIGHTS OF DATA OWNERS

Pursuant to Article 11 of the LPPD, personal data owners shall have the following rights:

- a. Learn whether or not their personal data are being processed,
- b. Request related information if their personal data have been processed,
- c. Learn the purpose of the data processing and whether the data have been used in accordance with the purpose,
- d. Be informed about third parties within the country and abroad to whom their personal data have been transferred,
- e. Request corrections if their personal data have been used incompletely or inaccurately,

- f. Request removal or erasure of their personal data in accordance with the conditions stated in Article 7 of the LPPD,
- g. Request that transactions made pursuant to subparagraphs (d) and (e) are notified to third parties to whom personal data were transferred,
- h. Object to a result based on analysis of the processed data by automatic systems that is against their interests,
- i. Request compensation if they incur any losses due to unlawful processing of personal data.

7. STORAGE PERIOD OF PERSONAL DATA BY THE COMPANY

The Company stores personal data for the time period specified in the law and regulations, if any. If there is no time period specified in the law and regulations for the storage of personal data, the Company shall process personal data as long as necessary based on commercial practices, before erasing, destroying or anonymizing them.

8. ERASING, DESTROYING OR ANONYMIZING PERSONAL DATA

Despite being processed in accordance with the LPPD and other relevant provisions of the law, if the purposes for processing personal data have ceased to exist or if the relevant owner requests so, the personal data shall be erased, destroyed or anonymized by the Company.

9. ORGANIZATIONAL STRUCTURE FOR PROTECTING AND PROCESSING PERSONAL DATA WITHIN THE COMPANY

A "Personal Data Protection Committee" or the relevant responsible person is appointed to manage this policy and other policies based on and related to this policy. The responsibilities of the appointed Committee or responsible person are as follows:

- Prepare the principle policies concerning processing and protection of personal data and make the necessary arrangements within the Company to ensure compliance with responsibilities under the LPPD,
- Present the prepared principles and action steps for the approval of the Company management,
- Ensure and monitor compliance with the law of the Company's personal data policy,
- Make the necessary assignments in order to ensure implementation of the policies on processing and protecting personal data,
- Identify the potential risks that might arise during the Company's personal data processing activities and ensure that the necessary measures are taken,
- Ensure that Company employees receive training on the protection and processing of personal data and the policies created on this subject,
- Resolve the applications of personal data owners,
- Manage relationships with the Personal Data Protection Authority and the Personal Data Protection Board.