



**ETI SODA PRODUCTION MARKETING TRANSPORTATION AND
ELECTRICITY GENERATION INDUSTRY AND TRADE LIMITED
COMPANY**

**POLICY STATEMENT ON THE PROTECTION AND PROCESSING OF
PERSONAL DATA**

POLICY STATEMENT ON THE PROTECTION OF PERSONAL DATA

ETİ SODA PRODUCTION MARKETING TRANSPORTATION AND ELECTRICITY GENERATION INDUSTRY AND TRADE LIMITED COMPANY	ETİ SODA PRODUCTION MARKETING TRANSPORTATION AND ELECTRICITY GENERATION INDUSTRY AND TRADE LIMITED COMPANY. Policy On The Protection And Processing Of Personal Data
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Version	2.0. (Date of Update: 19.12.2023)
Approved By	ETİ SODA PRODUCTION MARKETING TRANSPORTATION AND ELECTRICITY GENERATION INDUSTRY AND TRADE LIMITED COMPANY.

In case of any inconsistency between the Turkish version of the policy and any translation, the Turkish version should be respected.

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POLICY STATEMENT ON THE PROTECTION OF PERSONAL DATA

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POLICY STATEMENT ON THE PROTECTION OF PERSONAL DATA

1. PURPOSE OF THE POLICY

Our company, **ETİ SODA ÜRETİM PAZARLAMA NAKLİYAT VE ELEKTRİK ÜRETİM SANAYİ VE TİCARET ANONİM ŞİRKETİ**, as a data controller, acts with awareness of the importance of the confidentiality and security of personal data obtained within the scope of the Personal Data Protection Law No. 6698 (**KVKK**) and other relevant legislation. It aims to fulfill the requirements for compliance with the Personal Data Protection Law No. 6698 and related legislation properly and to establish a data protection and processing policy in line with international standards.

Our Company's Personal Data Protection Policy (Policy) is established in accordance with the principles of legality, honesty, and transparency adopted by the Company in the protection and processing of personal data.

In this Policy, the basic principles we adhere to in the processing of personal data, due to our status as a data controller, are outlined. Our company acts with utmost compliance and determination without compromising on these fundamental principles during personal data processing activities and identifies personal data processing processes in line with the the Constitution of Republic of Türkiye, KVKK, and relevant legislation through the Personal Data Inventory. This data is processed in accordance with the provisions of KVKK, other relevant legislation, and as specified in this Policy.

2. SCOPE

This Policy covers all personal data processed through automated means or non-automated means, provided that they are part of any data recording system, for natural persons who are defined as "relevant person" in KVKK and relevant legislation. The methods of collecting personal data of the relevant persons, the legal basis for collection, the purposes of processing, and the parties with whom the data is shared are detailed in the Clarification Texts and Explicit Consent Texts provided to the relevant persons, based on the channels through which the personal data of the relevant persons reach our Company and the relevant persons who are reached through these channels.

3. DEFINITIONS

Anonymization	: Making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even by matching with other data
Explicit Consent	: The data subject's declaration of consent for the processing to be carried out after being informed about the relevant processing before it is performed.
Disclosure Text	: Disclosure to the relevant person on how long the personal data will be stored and for what purpose, how it is collected, how it is stored and whether it will be shared with third parties
Authority	: Personal Data Protection Authority
Inventory	: An inventory created by data controllers, linking personal data processing activities carried out in connection with their business processes to the purposes of personal data processing, data categories, recipient groups to whom data is transferred, and the group of data subjects, detailing and explaining the maximum period necessary for the purposes for which the personal data is processed, personal data intended to be transferred to foreign countries, and the measures taken regarding data security.
Relevant Person	: Natural person whose personal data is processed

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Disposal	:	Deletion, destruction or anonymization of personal data
Processing	:	Recording, storing, retaining, changing, rearranging, disclosing, transferring, taking over, making available, classifying of personal data in Article 3 of KVKK
Law/KVKK	:	Law on the Protection of Personal Data
Personal Data	:	Any kind of information regarding an identified or identifiable natural person. For example; name-surname, TR ID, e-mail, address, date of birth, bank account number, etc. Dolayısıyla tüzel kişilere ilişkin bilgilerin işlenmesi KVKK kapsamında değildir.
Processing of Personal Data	:	The acquisition, recording, storage, preservation, modification, rearrangement, disclosure, transfer, takeover, making available, classification, or prevention of use of personal data, whether fully or partially by automated means or by non-automated means, provided that it is part of any data recording system, or any other operations performed on the data.
the Board	:	Personal Data Protection Board
Authority	:	Personal Data Protection Authority
Sensitive Critical Data	:	Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and attire, membership of associations, foundations or unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data
VERBIS	:	The information system, accessible via the internet, established and managed by the Authority, which data controllers will use in applying to the Registry and for other related processes concerning the Registry.
Data Processor	:	A natural or legal person who processes personal data on behalf of the data controller based on the authority given by the data controller.
Data Controller	:	A natural or legal person who determines the purposes and means of processing personal data, and is responsible for the establishment and management of the data recording system.
Data Controllers Registry	:	The Data Controllers Registry kept by the Authority.
Data Controller Contact Person	:	The natural person notified by the data controller at the time of registration to the Registry for communication with the Authority concerning the obligations under the Law and secondary amendments to be issued based on this Law, for legal entities located in Türkiye and for the representative of legal entities not located in Türkiye
Deletion	:	Process of deleting personal data, making personal data unavailable and unusable in any way for relevant users
Destruction	:	Process of destroying personal data, making personal data unavailable and unusable in any way for relevant users

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4. RELEVANT PERSONS WHOSE PERSONAL DATA IS OBTAINED

The table below lists the relevant persons whose personal data is collected and processed by our Company, and the scope and application of this Policy are limited to the relevant persons listed in this table. Requests from data relevant persons outside these definitions will also be processed by our Company within the framework of the KVKK and relevant legislation.

Job Candidate	:	Individuals who have applied for a job or internship at our Company, or who have made their resumes and/or relevant information available for review by our Company.
Reference	:	Persons whose opinions are consulted regarding job candidates during the recruitment process.
Person Providing Reference	:	Former employees who have given consent to be contacted as references.
Employee	:	Individuals working at our Company under an employment contract.
Employee's Family Member	:	Family members of employees.
Emergency Contact	:	Persons identified by employees to be contacted in case of an emergency.
Corporate Customer Employee	:	Employees of corporate customers who benefit from our products or services.
Shareholder/Partner	:	Individual shareholders of our Company.
Person Filling Out the Contact Form	:	Individuals who fill out the contact form on our website.
Business Partner Representative	:	Representatives of our business partners who are involved in providing products or services to our customers.
Authorized Signatory	:	Authorized signatories of our Company.
Members of the Board of Directors	:	Individual members of our Company's Board of Directors.
Consultant, Supplier, and Business Partner Representatives, Shareholders, Employees	:	Shareholders, employees, and representatives of institutions with which our Company has any business relationship, receives services from, or collaborates with
Guardian/Trustee/Representative	:	Individuals authorized to represent someone by custody, guardianship, or power of attorney.
Visitor	:	Individuals who have visited our Company premises.
Guest	:	Individuals who have accessed our Company's hotspot internet sharing.
Third Parties	:	Individuals whose images are captured by CCTV but whose identity information is not known.
Caller to Switchboard	:	Individuals who contact us via our Company's phone numbers.

5. MAIN PRINCIPLES IN PROCESSING OF PERSONAL DATA

Our company meets the general principles and conditions specified in the legislation regarding the protection and processing of personal data and acts in accordance with the principles listed below in order to ensure that personal data is processed in accordance with the Constitution and KVKK, and at the same time, our activities are carried out by our employees in accordance with these principles with a high awareness in company practices.

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5.1. Prohibition of Processing Personal Data as a Rule

The Company processes personal data only within the limits prescribed by legislation, recognizing that processing personal data is generally prohibited, except for the following reasons:

a. Existence of Explicit Consent of the Data Subject

One of the conditions for processing personal data is the explicit consent of the data subject. The explicit consent of the data subject should be based on information and given freely regarding a specific subject matter. Data is processed within the scope of the data subject's explicit consent and for the purposes specified in the explicit consent. As a rule, in cases where the conditions specified in subparagraphs b, c, d, e, f, g, and h of this article exist, there is no need to obtain the data subject's explicit consent additionally.

b. Explicit Provision in Laws

If explicitly provided for by law, personal data of the data subject is processed in compliance with the law. In cases where the law explicitly allows data processing, data is processed limited to the reasons and data categories specified in the relevant law.

c. Failure to Obtain Explicit Consent Due to Actual Impossibility

Personal data of a person who is unable to express consent due to actual impossibility or whose consent cannot be deemed valid, if processing is necessary to protect their own or another person's life or bodily integrity, personal data may be processed.

d. Direct Relation to the Establishment or Performance of a Contract

Provided that it is directly related to the conclusion or execution of a contract, personal data may be processed if it is necessary to process personal data of the parties to the contract (on condition that the person whose data will be processed based on the conclusion or execution of the contract is one of the parties to the contract).

e. Fulfillment of Legal Obligations

Personal data may be processed if processing personal data is necessary for the Company to fulfill its legal obligations.

f. Public Disclosure of Personal Data by the Personal Data Owner

If the data subject has disclosed their personal data to the public, personal data may be processed limited to the purpose of public disclosure.

g. Processing of Data Being Necessary for the Establishment or Protection of a Right

Personal data may be processed if it is necessary for the establishment, exercise, or protection of a right.

h. Data Processing Being Mandatory Due to Legitimate Interests

Personal data may be processed if it is necessary for the legitimate interests pursued by our Company, provided that it does not harm the fundamental rights and freedoms of the data owner.

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In the event that the processed data qualifies as sensitive personal data as defined in KVKK and explicit consent of the data subject is not obtained, such data may only be processed in events provided below, under the conditions to be specified by the Board, upon taking adequate measures.

5.2. Compliance with Law and Principles of Integrity

In accordance with Article 4 of the KVKK, our Company processes personal data in compliance with the law and principles of integrity, aiming to balance conflicting interests by protecting "legitimate interests". Transparency and honesty are the foundations of our communication, clear information about the purpose of the collected personal data is provided, and data is processed within this framework.

5.3. Devotion to Purpose, Restrictiveness and Moderation

Our Company determines the purposes for which it will process the data of the relevant person based on their explicit consent. In this context, we avoid processing personal data that is unrelated to or unnecessary for the purpose of processing, and only the necessary data is collected to the minimum extent required during data processing activities.

5.4. Ensuring Personal Data is Accurate and Up-to-Date When Needed

Our Company ensures that the personal data it processes is accurate by relying on the statements of the relevant person and obtaining confirmation of its accuracy when necessary.

5.5. Processing Personal Data for Specific, Explicit, and Legitimate Purposes

Our Company collects and processes personal data for legitimate and lawful reasons. Our Company processes personal data in connection with the activities we carry out, within reasonable limits, and to the extent necessary, and retain it for the duration specified in the relevant legislation or as required for the purpose for which it was processed.

5.6. Data Security Principle

Our Company is aware that with the advent of technology, ensuring the security of your personal data is not limited to legal methods and requires technology-supported security measures. In this context, all necessary precautions are taken to ensure data security.

5.7. Data Minimization Principle

The Data Minimization Principle refers to the collection and processing of data that is adequate, relevant, and limited to what is necessary for the purpose for which it is processed.

6. PERSONAL DATA COLLECTION CHANNELS

Our Company may collect personal data of relevant persons mentioned in Article 4 of this Policy through automatic or non-automatic methods, verbally, in writing, or electronically. In this context, the processes of obtaining personal data are listed below. Relevant persons are informed according to the channels through which personal data is obtained, as required by the relevant legislation.

Recruitment and Employment Needs	:	Personal data obtained from job candidates for employment purposes are processed at our Company. This process refers to the period until the establishment of the employment contract.
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Establishment and Execution of the Employment Contract	:	Personal data are processed during the signing and execution of the employment contract with employees.
Incoming Calls to the Switchboard	:	Personal data such as names and phone numbers of relevant persons are processed through calls received by our Company's telephone switchboard.
Establishment and Execution of Contracts	:	Personal data of real persons are processed within the scope of contracts signed by our Company.
Establishment and Execution of Contracts with Vendors and Business Partners	:	Personal data obtained during the procurement of services and products from real and legal persons are processed for the continuation of commercial activities.
Security Services	:	Personal data obtained from individuals visiting our premises for security purposes are processed.
Digital Communication Channels	:	Personal data of relevant persons are processed through digital communication channels such as the contact form on our website and our info email address.

7. TYPES OF PERSONAL DATA COLLECTED

The personal data obtained by our Company from the relevant persons specified in this policy are detailed in the relevant person's clarification text, taking into account the data categories, collection channels, processing purposes, legal grounds for processing, third parties to whom the personal data is transferred, and the purposes of the transfer. If there are changes in the personal data obtained from the relevant persons, the Inventory and VERBIS registration are updated.

8. OBLIGATION TO INFORM

Our Company informs the relevant persons who are the owners of the personal data obtained during its activities in accordance with Article 10 of KVKK, before or at the latest during the collection of the personal data.

Within the framework of this obligation to inform, the main topics that need to be communicated to data owners are listed below:

- Identity of the data controller and its representative, if any
- The purposes for which the personal data will be processed,
- To whom and for what purposes the processed personal data may be transferred,
- The method and legal basis for collecting personal data,
- Other rights of the relevant person listed in Article 11 of KVKK.

Our Company has prepared information texts for data owners to be provided within the scope of the aforementioned KVKK provision, regarding the process and the persons whose data are processed, to fulfill the obligation to inform. After presenting the information texts to data owners, for data processing activities and data categories that require the data owner's explicit consent for our Company to carry out its commercial activities, explicit consent declarations are obtained and acted upon accordingly.

As per the Article 28(1) of KVKK, our Company does not have an obligation to inform in the following events:

Processing of personal data by real persons within the scope of activities related to themselves or their family members living in the same household, provided that the personal data is not given to third parties and the obligations regarding data security are complied with,

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- Processing of personal data for purposes such as research, planning, and statistics by anonymizing 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 defense, national security, public security, public order, economic security, privacy of private life, or personal rights, and does not constitute a crime,
- Processing of personal data within the scope of preventive, protective, and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public security, public order, or economic security,
- Processing of personal data by judicial authorities or execution agencies regarding investigation, prosecution, trial, or execution proceedings.

As per the Article 28(2) of KVKK, our Company's obligation to inform will not apply in the following events:

- When the processing of personal data is necessary for the prevention of crime or for criminal investigation,
- When the processing of personal data made public by the data owner,
- When the processing of personal data is necessary for the execution of supervision or regulation duties and disciplinary investigations or prosecutions by authorized and competent public institutions and organizations and professional organizations in the nature of public institutions, based on the authority given by the law,
- When the processing of personal data is necessary for the protection of the economic and financial interests of the Country with regard to budget, tax, and financial matters.

9. POLICY ON SENSITIVE PERSONAL DATA

In accordance with the Personal Data Protection Board's decision dated 31/01/2018 and numbered 2018/10 on the Adequate Measures to be Taken by Data Controllers in the Processing of Sensitive Personal Data, sensitive personal data are protected by our Company with special security measures. In this context, our Company has prepared and implemented a Sensitive Data Policy.

Article 6 of the Law on sensitive data is as follows:

(1) Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and attire, membership of associations, foundations or unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data are considered sensitive personal data.

(2) Processing sensitive personal data without the explicit consent of the relevant person is prohibited.

(3) Sensitive personal data other than those related to health and sexual life listed in the first paragraph may be processed without the explicit consent of the relevant person in cases stipulated by law. Personal data related to health and sexual life may be processed without the explicit consent of the relevant person only by persons or authorized institutions and organizations who are under the obligation to maintain confidentiality, for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, or the planning and management of health services and their financing.

(4) In the processing of sensitive personal data, it is also required to take adequate precautions as determined by the Board.

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The principles adopted by our Company regarding the protection and processing of sensitive personal data are presented in accordance with the principles of legality, honesty, and transparency. An **Access Authorization Matrix**) has been prepared to monitor the security of sensitive data and the authorization of access to the media where these data are processed within our Company.

10. RIGHTS OF THE PERSONAL DATA OWNER

In accordance with Article 11 of the KVKK, every individual has the right to apply to our Company as a data controller regarding the following matters:

(1) Every individual, by applying to the data controller, has the right to:

- a) Learn whether the personal data have been processed,
- b) If the personal data have been processed, to request information pertaining thereto,
- c) Learn the purpose of personal data processing and whether such data are being utilized for the due purposes,
- ç) Know the third persons to whom personal data are transferred domestically or abroad,
- d) Request correction of personal data if it is incomplete or inaccurately processed,
- e) Request the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of the Law No. 6698,
- f) Request notification of the operations carried out pursuant to subparagraphs (d) and (e) to third parties to whom personal data has been transferred,
- g) Object to the emergence of a result against the person themselves by analyzing the processed data exclusively through automated systems,
- ğ) In the event of the incurrance of losses due to unlawful processing of personal data, to request compensation for such losses.

11. METHOD OF EXERCISING THE RIGHTS OF THE PERSONAL DATA OWNER

Pursuant to Article 13, paragraph 1 of the KVKK, and the Communiqué on the Procedures and Principles of Application to the Data Controller published in the Official Gazette dated 10.3.2018 and numbered 30356, applications to our Company, as the data controller, regarding these rights must be submitted in writing or by other methods determined by the Personal Data Protection Board ("**Board**").

The "relevant person", as the personal data owner, may notify our Company of their rights and requests stated in Section A. In this context, the relevant person may apply in writing to exercise all other rights they have under Article 11 of the Personal Data Protection Law No. 6698, in the following context:

- By the applicant's personal application,
- By mail with a signature declaration,
- Via notary,
- With a secure electronic signature,

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- By signing with a secure electronic signature registered in the name of the applicant and sending it to the KEP address specified below,
- By sending it from the e-mail address previously notified to the data controller by the relevant person and registered in the data controller's system,

The application must include the following.

- Name, surname, and signature if the application is in writing,
- For Turkish citizens, T.R. identity number; for foreigners, nationality, passport number, or identity number, if any,
- Residence or workplace address for notification,
- E-mail address, telephone and fax number for notification, if any,
- Subject of request,
- Information and documents related to the subject.

In written applications, the date on which the document is delivered to the data controller or its representative will be considered the application date.

For applications made using other methods; the date of receipt of the application to the Data Controller is accepted as the date of application.

The request will be finalized as soon as possible and within a maximum of thirty days, free of charge, depending on the nature of the request. However, if the process requires an additional cost, the fee determined by the Board's tariff may be charged.

Applications must be made by the individual themselves. Applications on behalf of someone else can only be made by submitting a power of attorney that includes the right to request information under the KVKK. **Our Company** may request verification information from the relevant person if there is any doubt about the identity of the applicant.

12. CONTACT INFORMATION

Title: ETİ SODA PRODUCTION MARKETING TRANSPORTATION AND ELECTRICITY GENERATION INDUSTRY AND TRADE LIMITED COMPANY.

Head Office Address:: Yeşilağaç Mahallesi Gurağaç Kümeevler, No:47/A Beypazarı /ANKARA

Contact Link and E-mail address: www.etisoda.com / iletisim@etisoda.com

13. MEASURES TAKEN TO PROTECT PERSONAL DATA

In accordance with Article 12 of the KVKK, our Company takes the necessary administrative and technical measures to prevent the unlawful processing of personal data, prevent unauthorized access to personal data, and ensure the safe storage of personal data processed by our Company and necessary audits are conducted or commissioned to ensure compliance. While appropriate measures are taken according to the nature of the personal data, sensitive personal data are protected with stricter security measures.

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14. STORAGE OF PERSONAL DATA

The personal data obtained by our Company are securely stored in physical or electronic media for an appropriate period of time to enable our Company to carry out its activities. Within the scope of the activities in this regard, our Company acts in accordance with the obligations stipulated in all relevant legislation, especially the KVKK, regarding the protection of personal data.

If the legislation does not specify a period for how long personal data should be stored, the personal data are retained for a period determined based on the following criteria, and at the end of this period, destroyed. Thus, after the expiration of this period, personal data are deleted, destroyed, or anonymized.

Except in cases where longer retention periods are permitted or required by applicable law, if the purpose of processing personal data has ceased and the relevant person requests it, the personal data will be deleted, destroyed, or anonymized.

When personal data is deleted using these methods, this data will be destroyed in such a way that it cannot be reused or retrieved in any way. However, if the data controller has a legitimate interest, despite the expiration of the purpose of processing and the periods specified in the relevant laws, personal data may be stored until the expiration of the general limitation period (ten years) regulated in the Code of Obligations, provided that the fundamental rights and freedoms of the data subjects are not harmed. Employee data will be retained for 15 years following the termination of the contract, in accordance with the Labor Law and Occupational Safety Legislation. After the expiration of these limitation periods, personal data will be destroyed by being deleted or destroyed, documented in accordance with the procedures in the **Storage and Disposal Policy**.

15. TRANSFER OF PERSONAL DATA TO DOMESTIC PARTIES

Our Company meticulously adheres to the conditions stipulated in the KVKK regarding the sharing of personal data with third parties, without prejudice to the provisions contained in other laws.

In this context, personal data is not transferred to third parties by our Company **without the explicit consent of the data owner**. However, in the presence of any of the following conditions regulated by the KVKK, personal data may be transferred by our Company without obtaining the explicit consent of the data owner:

- Explicit provision in laws,
- Being imperative for the protection of life or bodily integrity of a person or another who is unable to express his/her consent due to physical inability or whose consent is not attributed with legal validity,
- Provided that it is directly related to the establishment or performance of a contract, the processing of personal data belonging to the parties to such contract being required,
- Being imperative for the data supervisor's fulfilling its legal obligations,
- Data being made public by the data owner,
- Being imperative for the establishment, exercise or protection of a right,
- Being necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

With adequate measures taken, sensitive personal data other than those related to health and sexual life may be transferred without explicit consent if stipulated by law. For sensitive personal data

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related to health and sexual life, personal data may be transferred without explicit consent for purposes such as:

- Protecting public health,
- Preventive medicine,
- Medical diagnosis,
- Conducting treatment and care services,
- Planning and managing health services and their financing.

The conditions specified in the processing conditions of sensitive personal data are also adhered to when transferring such data.

16. TRANSFER OF PERSONAL DATA ABROAD

In accordance with **Article 9 of the KVKK**, the explicit consent of the data owner is required for the transfer of personal data abroad. However, if the conditions allowing the processing of personal data, including sensitive personal data, without the explicit consent of the data owner are met, our Company may transfer personal data abroad without obtaining explicit consent, provided that there is adequate protection in the country to which the personal data will be transferred.

If the country to which the transfer will be made is not determined by the Board to provide adequate protection, our Company and the data controller/data processor in the relevant country will guarantee adequate protection in writing.

17. EFFECTIVENESS AND IMPLEMENTATION

Our Company's policies regarding the processing and protection of personal data will primarily be regulated in accordance with the KVKK and other relevant legislation. In case of any updates to the Policy as a whole or specific articles, such updates will enter into force upon their publication. The Policy in its most current version is published on our Company's website at <https://www.etisoda.com/kisisel-verilerin-korunmasi/>. Our Company will periodically update the Policy by making changes if there are amendments to the provisions of the legislation. In the event of any incompatibility between the provisions of the KVKK and other relevant legislation and this policy, the provisions of the KVKK and other relevant legislation shall apply first.

This policy was updated on 19.12.2023 and became Version: 2.

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INFORMATION SECURITY, KVKK COMPLIANCE AND IMPLEMENTATION COMMITTEE

Fatma Aysun CEBİ	Legal Counselor	Member/Contact Person
Dilek ARISOY	Vice General Manager / Accounting Budget and Planning Director	Member
Çağatay MADAK	Human Resources Manager	Member
Emrah DALGIÇ	Accounting Manager	Member
Onur AKBABA	Quality Assurance & Quality Control Manager	Member
Sedat ABAKAY	Workplace Physician	Member
Metin ÖNAL	Information Technology Specialist	Member