

Policy Statement on Data Protection

POL.07

PUBLISHED 01/04/2024 UPDATED 01/04/2024 Rev.0

POLICY STATEMENT ON DATA PROTECTION

We take technical and administrative measures to ensure the security and privacy of the personal data we process, in accordance with the Constitution of the Republic of Türkiye, Turkish Penal Code, the Law on the Protection of Personal Data No. 6698, UK GDPR and other applicable national or international law.

We commit to the following:

- We organise awareness training for our employees regarding the importance of personal data, the possible risks of a breach and how to protect personal data.
- We have an Employee Handbook, including detailed information about ensuring the privacy of personal information in their business dealings.
- We take the necessary measure on the processing of private data in accordance with the current decision of the Personal Data Protection Board on Adequate Measures to be Taken by Data Controllers in the Processing of Private Data.
- We ensure compliance with the applicable national and international Data Protection Laws including the storage and erasing of personal data as necessary.
- We closely monitor data intervention breach risks by preparing a Data Intervention Breach Plan, in partnership with the Personal Data Protection Board. We periodically review the Personal Data Processing Inventory.
- We adhere to disclosure requirements for data subject groups in line with the Personal Data Processing Inventory and to carry out processing of personal data only in accordance with the relevant legislation.
- We periodically review the Company's agreed data processors, selecting suppliers through a thorough tender process.
- We incorporate necessary contractual clauses related to the transfer of personal data in agreements with our customers and suppliers.
- We ensure compliance with relevant legislation and board decisions, keeping all pertinent departments informed.
- We maintain our commitment to adhere to Personal Data Protection regulations at the highest standard.
- We uphold the Company's uncompromising principles in regards to data protection, as outlined in our "Policy for the Protection and Processing of Personal Data, Policy for the Protection of Private Personal Data, and Storage and Retention," and communicate these policies to our employees and stakeholders.
- We ensure confidential reporting of policy breaches or concerns via available we•speakup reporting channels and wespeakup@wesoda.com. We evaluate reports from an ethical and legal perspective and protect whistleblowers from reprisals.
- We enforce disciplinary actions, up to employment termination, for policy breaches by employees.

wesoda.com