

ÇALIK DENİM

POLICY OF ÇALIK GROUP ON PROTECTION AND PROCESSING OF THE PERSONAL INFORMATION

Name of the Document:

Policy of Çalık Group on Protection and Processing of the Personal Information

Target Audience:

Employees, candidate employees, suppliers, shareholders, company officials, cooperating company employees and similar counterparts whose personal information are being processed by Çalık Group.

Prepared by:

Çalık Holding A.Ş. Legal Affairs Directorate and Human Resources Directorate

Version:

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Approved by:

Board of Directors of Çalık Holding A.Ş.

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This Policy shall be updated from time to time to be adapted to the changing legislations.

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1. OBJECTIVE

The Law Numbered 6698 on the Protection of Personal Data ("KVKK"/Privacy Act) was published/promulgated in the Official Gazette dated April 7, 2016 and numbered 29677. KVKK sets out the obligations of natural persons and legal persons/entities that protect the fundamental rights and freedoms of natural persons, including the privacy of private life protected by the Constitution, of natural persons whose personal data are processed.

The aim of this Policy is to support Çalık Holding A.Ş. and Group Companies (Çalık Group) to stipulate/define the code of practice and related obligations so as to ensure that personal data relating to the person concerned are processed and maintained in accordance with KVKK.

2. SCOPE

Within the scope of this Policy included are; the employees, shareholders, officers and personnel of third party companies, customers, real customers, potential employees, employees, company shareholders, company officials, employees of the cooperated companies, shareholders and officials and third parties who are part of any data recording system processed automatically or not. The policy is applied in activities carried out for the processing and protection of all personal data, which is possessed/owned by Çalık Group or is managed by Çalık Group.

This Policy was prepared as per KVKK and other relevant legislations.

Çalık Group; the Company will provide all employees in the organization with adequate training and reference materials so as to ensure that their assets can be appropriately protected.

This Policy sets forth/describes the basic control measures that everyone in Çalık Group who are expected to be aware of and constantly comply with.

3. DEFINITIONS AND ABBREVIATIONS

In This section the special terms and expressions and abbreviations shall be explained briefly.

Express consent: Consent given as acknowledgment of a specific subject, declared as informed and based on free will, and limited to data processing.

Anonymization: Making personal data unlikely to be associated with any identifiable or certain natural person in any way, even when paired with other data.

Çalık Group: Çalık Holding A.Ş. and Group Companies.

Çalık: Çalık Holding A.Ş.

Employee: Any employee of Çalık Group.

Group Company: This definition is also included in the companies which have the decision to be taken by the Governing Boards of the related companies and which have the above rates in addition to the provisions of the laws of the country in which they are established, and includes such companies in such a way that Çalık Holding A.Ş. and/or its shareholders hold in such a way not to meet the ratios above

Service Provider: Employee of the company (supplier, subcontractor, customer, etc.) which Çalık Group is given service and / or gives service to.

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Personal Data Owner (Person Concerned): The natural person whose personal data is processed.

Personal Data: All information relating to the natural persons whose identities are clear or can be identified.

Processing of Personal Data: All types of transactions executed over the recording, storing, maintaining, altering, rearranging, disclosing, transferring, taking over, acquiring, classifying or preventing use, taking over or rendering obtainable of personal data in whole or in part automatically or in any part of a data recording system any actions performed on the data, .

Board: Board on Protecting the Personal Data.

Authority: The Personal Data Protection Authority

KVKK: Law on Protecting the Personal Data (Privacy Law) numbered 6698 promulgated on Official Gazette dated April 7, 2016 numbered 29677

Personal Data with Particular Nature: The data with particular nature as set forth under KVKK article 6.

Policy: Personal Data Protection and Processing Policy of Çalık Group.

Data Processor: A person who is a natural or legal person and processes the personal data on behalf of the data official based on the authority of the data official.

Data Official: Natural person or legal person (entity) responsible for determining the purposes and means of processing Personal data, responsible for setting up and managing the data record system, and liable for registering the Data Officials with the Data Accounts Registry.

4. ROLES AND RESPONSIBILITIES

4.1 Data Official

All types of operations such as storage, preservation, alteration, rearrangement, disclosure, transfer, transfer, acquisition or classification of personal data in accordance with KVKK in whole or in part, or in a part of any data recording system, such as the prevention of the use of personal data shall be referred to as the processing of information.

Çalık Group is responsible for the establishment and management of the data record system by determining the processing purposes and means of the personal data recorded in the database and declaring that it shall be registered data responsibility by registering the data responsibility when the Data Accounts Registry has been opened

4.2 Data Official's Representative

When the Data Accounts Register is established for all Group Companies within Çalık Group, the data account representative for such registry registration shall be appointed and assigned accordingly and the person responsible for the management and execution of all personal data protection and processing, security precautions and regular inspections activities need to be an expert.

4.3 Data Processor

Natural or legal persons (e.g. contractors, suppliers, etc.) who process personal data on behalf of Çalık Group on the basis of authorization will be considered as data processors.

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In the event that any personal data is to be processed by another natural or legal person on behalf of Çalık Group, the persons responsible for the data with Çalık Group as data responsibility will be jointly responsible for taking the measures. Çalık Group; as a data responder, trust what they provide to interested persons who share their personal data with themselves; periodically checks the data processors' compliance with this policy in order to ensure that they are maintained in the same way by business partners, service providers, suppliers and contractors.

5. LEGAL OBLIGATIONS

In accordance with KVKK, Çalık Group has legal obligations under the frame of protection and processing of personal data. These obligations are listed as follows:

5.1 Obligation to inform/clarify

Çalık Group is obliged to inform the person concerned and to inform the related person about the following matters during the collection of personal data:

- The identity of the data official and his representative if there is any,
- For which purpose the personal information shall be processed,
- To whom and for which purposes the processed personal information may ve transferred,
- Method and legal grounds of protecting personal data,
- Rights of the relevant person.

Çalık Group will be informed about the processing of personal data of persons involved in different vehicles within the scope of the duty to inform and clarify. In addition, Çalık Group attaches great importance to public understanding of open policies by personal data owners. The web pages of Çalık Group Companies contain information on the above-mentioned issues.

Which instruments are to be used or not relating to how the relevant persons are going to be informed were determined with the internal guidelines.

5.2 Liability to Inform

In accordance with Article 11 of KVKK, the right of the person concerned to whom personal data is provided to protect personal data is as set forth in Chapter 11 of this Policy. In accordance with Article 13 of KVKK, Çalık Group assesses and evaluates the requests related to the rights in question; it is obliged to inform the relevant persons and this notification shall be served within the period determined within the scope of the legal legislation.

Such requests shall be notified/communicated to Çalık Group by the relevant persons in writing or by other means as may be determined by the Board. Çalık Group tries to provide more opportunities to apply for the relevant person so as not to breach or violate the Board's decision.

5.3 Obligation to Ensure Safety of Data

The responsibilities of Çalık Group acting as data official in relation to data security arising from Article 12 of KVKK is set forth/stated under Section 10 of this Policy.

5.4 The Obligation for the Data Officials to be registered to the relevant registry

Çalık Group is obliged to register to the Data Officials Register within the period determined and announced by the Board in accordance with Article 16 of KVKK.

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In accordance with Article 16/3 of KVKK; the obligation to register/enroll in the register may be exempted for some of the Group Companies, taking into account the objective criteria to be determined by the Board, such as the nature of the personal data being processed, taking into consideration the number of the data processors.

6. CLASSIFICATION OF THE PERSONAL DATA

6.1 Personal Data

KVKK defines personal data as any kind of information relating to the identity of a specific or identifiable real person. In this context, it is necessary that the person's data is specific or identifiable (to be reached when combined with other information). The name, surname, date and place of birth, identity, social security number, telephone number, address, images, payment information, health information and so on of a person are encompassed by and included in the definition of personal data.

The subject of KVKK is the fact that the data are real persons; and the legal entities are excluded. For this reason, information that does not contain real person information such as a legal entity's registration number, trade name and registration information is not protected as personal data in accordance with and as per KVKK.

6.2 Personal Data with Special Properties

The personal data with particular nature; shall refer to the information that may cause the person concerned to become a victim or subject to discrimination if learned; In the first paragraph of Article 6 of KVKK, it is considered as follows: The rights of persons to racial, ethnic origin, political thought, philosophical belief, religion, sect or other beliefs, costume and clothing, association, foundation or trade union membership, health, sexual life, and safety measures and biometric and genetic data. It is prohibited to process the same without the explicit consent of the person concerned except in cases where expressly authorized in the blood of special personal data.

In this scope; such personal data shall be processed by Çalık Group in accordance with the conditions specified in Article 6 of the Corporate Tax Procedures Code provided that the clear consent is obtained from the relevant person and except when it is not permitted and allowed to process the same as per KVKK.

7. POLICY ON PROCESSING THE PERSONAL DATA

7.1 Principles to be adhered to for the processing of personal data

All relevant collected personal data shall be processed in accordance with the principles set forth in Article 4 of the Corporate Tax Procedures Code and in line with the terms and conditions specified in Articles 5 and 6. Çalık Group, and in accordance with the 4th article of KVKK; is responsible for processing personal data by processing personal data in accordance with the law and the rules of integrity/honesty, maintaining accurate and necessary current, specific, clear and legitimate aims, linked to the purpose, limited and measured, for the period required for the purpose of the relevant legislation or for the purpose of their processing accordingly.

That is to say;

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- Çalık Group is obliged to act in accordance with the principles stipulated by laws and other statutory legal regulations during the processing of personal data.
- Çalık Group must comply with the rules of integrity/honesty, be transparent during the processing of personal data, and comply with its obligation to inform and clarify.
- Çalık Group's personal data must be processed for legitimate and relevant certain reasons, that is to say, only for purposes that are legally clear, specific and legally binding
- Çalık Group must process personal data depending on the activities it carries out.
- Çalık Group personal data must be processed to the extent that it is necessary and required. In this context, the principle of proportionality should be taken into account and the personal data should not be used other than as the purpose requires. In addition, the measure to achieve the purpose should not be exceeded and, the processing of personal data that is not needed or required should be avoided
- Çalık Group should maintain personal data for the time required for the purposes for which it is set forth/prescribed or for the purpose for which it is concerned (see Chapter 9), and this information should be preserved without anonymizing it for any reason. If no time is specified in the legislation on personal data, reasonable retention times should be determined taking into account the data use intent and company procedures and the data should be kept confined to this period. Following the end of the period, personal data must be deleted, destroyed or anonymized in accordance with company procedures.

7.2 Purposes of Çalık Group for Processing Personal Data

Çalık Group processes the personal data as per the conditions and purposes under processing conditions and purposes relating to such processing within the scope of processing conditions and personal data with particular nature set forth under KVKK articles number 5 and 6. These goals and conditions are as follows

- Prescribing clearly the relevant activities of Çalık Group regarding the processing of personal data under the law and legislations.
- The fact that the processing of personal data by Çalık Group is directly related to and required by the execution or implementation/operation of a contract.
- The processing of personal data being mandatory for Çalık Group to fulfill its legal obligation
- Provided that personal data has been publicized by the relevant persons; their processing as restricted by Çalık Group for publicizing purposes.
- The processing of personal data by Çalık Group being statutory/mandatory for the establishment, utilization or protection of the rights of Çalık Group or related persons or third parties.

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- Provided that they do not harm the fundamental rights and freedoms of the persons concerned, it being compulsory to perform personal data processing activities for the legitimate interests of Çalık Group.
- The fact that personal data processing by Çalık Group is necessary/required for the protection of personal data bearer or other person's physical and / or physical integrity and that the personal data owner can not explain his / her privacy due to actual or legal invalidation.
- It being envisaged by the laws in terms of the particular nature personal information other than the health and sexual life of the personal data owner,
- Persons or authorized bodies under the obligation to process such information so as to preserve confidentiality for the following purposes which are under their statutory tasks of protecting public health, conducting preventive medicine, medical diagnosis, treatment and care services, planning and administering health services and financing in terms of personal data of the personal data holder regarding his / to be processed by such organizations.

In this scope, Çalık Group, processes your personal data for the following purposes:

- For planning, inspecting or executing the information security processes,
- Planning and execution of corporate sustainability activities,
- Activity management,
- Management of the relations with the business partners or suppliers,
- Carrying out the personnel recruitment/hiring processes of Çalık Group,
- Supporting the Holding and Group Companies in their personnel recruitment/hiring processes,
- Execution and following up of financial reporting and risk management transactions of Çalık Group,
- Execution/following up of Çalık Group legal affairs,
- Planning and execution of corporate communication activities,
- Planning and execution of corporate management activities,
- Carrying out the companies law and partnership law transactions,
- Handling requests and complaints,
- Ensuring the security of Çalık Group values,
- Supporting the Group Companies in terms of compliance with the legal legislations,
- Supporting the planning and executing processes of the rights and interests to be provided to the senior managers of Çalık Group,
- Planning and carrying out audit activities for the purpose of carrying out the Group Companies' activities in accordance with Çalık Holding procedures and related legislation,
- Supporting of Group Companies in the conduct of company and partnership transactions,,
- Performing activities towards maintaining the reputation of Çalık Group,
- Management of the investors' affairs,
- Providing the authorized bodies with information due to the legislations,
- Generating and tracking the visitor records.

In the event that the processing activity carried out with the above mentioned purposes does not meet any of the conditions stipulated in KVKK, Çalık Holding requires from the person concerned to

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express its consent statement

7.3 Ensuring that the Legal Data can be processed in line with the laws and applicable legislations

- Çalık Group, is obliged to take the following precautions to process personal information as per the applicable laws,
- To carry out the inter-company organization to ensure that the personal data are processed and stored/saved as per applicable laws,
- To generate the technical substructure in order to maintain the security of the databases where the personal data will be stored/retained,
- Ensuring that the generated sub-structure and processes thereof are inspected/supervised,
- To determine procedures to report the precautions taken and inspection processes be reported.

Çalık Group, shall take the following administrative precautions to process personal information as per law and legislations applicable:

- To inform and educate company employees about the legal protection and processing of personal data.
- To record the precautions/measures to be taken in cases where personal data are processed illegally by company employees in contracts, documents or policies that they have made with company employees
- To supervise the processing activities of personal data relating to the co-workers and their partners where they work together.

8. POLICY ON TRANSFERRING PERSONAL DATA

8.1 Transfer of Personal Data home

Çalık Group is obliged to act relating to the transfer of personal data in accordance with the decisions and regulations envisaged by the KVKK and taken by the Board. The personal data and the specially qualified data related to the concerned persons cannot be transferred by Çalık Group to other real persons or legal entities without the explicit consent of the person concerned.

Insofar as it is required by KVKK and other relevant legislation, the data only may be transferred to an administrative or judicial institution or organization which is authorized under the legislation and in accordance with the restrictions in this regard, without the explicit consent of the concerned party.

Furthermore, as foreseen in Article 8 of KVKK, under the second clause of Article 5 of KVKK (for example, compulsory for the execution or fulfillment of a contract or fulfilling our legal obligation) or for data with particular nature in the cases provided for in the third paragraph of KVKK Article 6, without the consent of the concerned/interested persons. Çalık Group, may transfer personal data in accordance with the conditions laid down in the relevant law and by way of taking all necessary safety precautions to third parties in Turkey.

8.2 Transfer of personal information abroad

Çalık Group, can transfer personal data to third parties in Turkey to be kept or rendered treatment in Turkey or other than Turkey, it may also transfer it abroad. In exceptional circumstances, where there

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is no explicit request for the transfer of personal data referred to in KVKK, in addition to unregistered processing and transferring conditions, there is a requirement that sufficient protection shall be provided in the destination country of the transfer. The Board shall determine whether sufficient protection is provided or not according to the authority of KVKK; In the absence of adequate protection in the event of an adequate protection of data in both in Turkey responsible for the relevant foreign country must have the permission of the Board and to commit and give undertakings in writing.

8.3 To which persons/authorities the transfers can be made

To the authorized bodies and institutions:

Information requested by public legal persons, legally authorized private persons or organizations and related legislation is shared according to Article 8/1 of KVKK

Other persons or entities to which personal data may be transferred for the purposes set out in section 7.2 are as follows; related subsidiaries/affiliates with contracts with Çalık Group to carry out its activities as subsidiaries and / or direct / indirect domestic / foreign subsidiaries and Çalık Group in the acquisition of data security measures such as the protection of all kinds of personal data, prevention of unauthorized access and illegal processing. domestic / foreign organizations and other third persons who are service partners, cooperate with the program partner

8.4 Precautions to be taken by Çalık Group for Transfer of Personal Data in Accordance with the Laws

The precautions taken in technical aspect:

- The Personal data that are processed and transferred or assigned as a result of transferring, personal data of different Group Companies within the scope of Çalık Group, different departments within the scope of such Group Companies and Çalık Group's own responsibility and authority under the responsibility of KVKK which are to take measures to prevent unauthorized access and use to real or legal persons.

The precautions taken in administrative regard:

- The different group companies in Çalık Group, the various departments within the Group Companies in question and the real or legal persons handling the personal data on behalf of Çalık Group under the responsibility and authority arising from KVKK, and which domestic policy has to be given to whom in the direction of the intended objective.

9. POLICY ON PROTECTION OF PERSONAL DATA

9.1 Protection/Preservation of data along the period of time required for the purpose for which it is envisaged or related to the relevant legislation

Çalık Group maintains the personal data it processes in accordance with Article 7 of KVKK and Article 138 of Turkish Criminal Code No 5237 for the period required for the purpose of processing personal data only if it is envisaged and foreseen in the relevant legislation or for a certain period in the legislation. The retained data will be deleted after the end of the retention period, and this period will be determined as 2 years on average, but the longer-term data will continue to remain in the system for as long as it is specified in the legislation.

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For this reason, a different period of protection for each personal data may be applicable for the period foreseen in the relevant legislation or for the purpose for which it is conducted. For example, pursuant to article 253 of the Tax Procedural Code No 213, the relevant books and documents must be kept for a period of 5 years long.

Another example is that, in accordance with the Regulation on Commercial Communications and Trade Electronic Communications, published in the Official Gazette dated July 15, 2015 and numbered 29417, the records of personal data must be kept for 1 year from the date when the relevant person's approval for use of personal data for marketing or promotional purposes is retracted/withdrawn. The contents of the commercial electronic communications and any other record relating to the transmission shall be kept for 3 years to be submitted to the relevant ministry when necessary and required.

On the other hand, a data may have been processed for more than one purpose, and in such a cases, when all the causes which lead to the processing of the concerned data to be discarded, the relevant data shall be deleted, destroyed or be kept as rendered anonymized.

9.2 The Precautions Taken by Çalık Group for the Protection of Personal Data

The personal data processed in accordance with the provisions of KVKK and other related legislations must be deleted, destroyed or anonymized by Çalık Group on the request of the person concerned directly or in the event that such data should not be used or retrieved in any way whatsoever. The procedures and principles used for the destruction or anonymization of personal data in accordance with the law shall be carried out in accordance with the principles and rules to be set out in the regulation to be issued pursuant to the Law on the Protection of Personal Data.

The precautions taken in technical aspect:

- Establishes necessary systems and control mechanisms for the deletion, destruction and anonymization of personal data by Çalık Group.

Precautions taken in administrative regard:

- Çalık Group is to inform and to raise awareness relating to the personal data of the real persons or legal entities that operate personal data on behalf of the Group in accordance with the law and in accordance with the responsibility and authority arising from KVKK; at the same time, ensure that their personal data are kept in accordance with the law in the framework of the agreements concluded with these persons and ensure that they are deleted, destroyed or made anonymous.
- Çalık Group is liable and responsible for supervising the activities of the personal data carried out by real or legal persons operating personal data on behalf of the Group on the basis of responsibility and authority arising from KVKK.

10. POLICY ON SECURITY OF PERSONAL INFORMATION

10.1 Obligations of Çalık Group relating to Data Security

In accordance with article 12 of KVKK, the obligations of Çalık Group acting as the data official are as follows:

The group bears the following obligations in this regard;

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to take all kinds of technical and administrative measures, so as

- to prevent unlawful processing,
- to prevent unlawful access,
- provide the preservation thereof
- To carry out necessary inspections within the establishment or to have them,
- Taking the necessary precautions not to disclose the personal data learned during his / her duties to someone else contrary to the provisions of the law and not to use it for the purpose of processing, even if they leave/give up their duties,
- Notify the concerned and the Board and the persons concerned if the processed personal data is seized by others unlawfully.

10.2 The Precautions which Çalık Group adopted relating to Data Security

In order to fulfill the obligations related to the security of personal data and to act quickly in situations where safety is a significant risk, Çalık Group takes the following measures listed hereinafter:

10.2.1. Technical and administrative precautions taken so as to prevent illegal access to personal relations

The technical and administrative measures which are to be taken in the relevant sections concerning the processing, transfer and storage of personal data are hereinafter listed. While Çalık Group is obliged to take these precautions completely and to prevent unlawful access, however, if the third parties having had access to personal data in violation and contravention of the law; all technical and administrative measures are taken so as to ensure that they are not harmed in accordance with the relevant legislation on the protection of personal data and Board decisions.

10.2.2. Precautions taken in protecting the personal information and their supervision and inspection

The data recording systems being used in the company are inspected after being periodically monitored and used in accordance with KVKK and related legislation and reports are generated and presented to the authorized persons or board.

Çalık Group, by acting on their behalf on the basis of their authority, provides information and awareness about the protection of personal or legal persons' personal data in accordance with the law by acting on their behalf on the basis of their authority and it is also obliged to establish provisions for the protection of personal data in accordance with the law in the framework of contracts executed and concluded with the persons in question.

10.2.3. The precautions to be taken in cases of personal information being disclosed in authorized manner

Çalık Group is obliged so as to take measures to prevent the unauthorized disclosure of personal data and to establish internal policies related to this. In addition, in such situations and cases, Çalık Group, as the data officer, is obliged to inform the persons and the Board that the personal data are disclosed in unauthorized manner.

11. THE RIGHTS OF THE PERSON CONCERNED

11.1 The right to access to personal information

The persons concerned have the right to access to personal information without being subject to any charges. Thus Çalık Group gives the concerned person the following information;

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- To learn whether the personal information are being processed or not,
- To request information relating to them if such information have been processed,
- To learn the purpose of processing the personal data and to learn whether they are used in line with their purposes or not,
- Making the request to know the third parties to whom the personal information is transferred home or abroad.

11.2 Right to change or delete Personal Data

The persons concerned have the right to change or delete personal data without having to submit or present a complaint.

In this framework, the relevant person shall have the following authorities;

- Demanding correction of personal data if it is incomplete or incorrectly processed,- Demanding that personal data be deleted or destroyed in the event that the grounds and reasons for the processing of personal data are not met,
- Demanding that the above mentioned correction, deletion or destruction be reported to a third party to whom personal data are transmitted,
- Objection to the occurrence of an unfavorable outcome by analyzing the processed data exclusively through automated systems

11.3 Ensuring that Personal Data is updated

In accordance with KVKK, there is an obligation to ensure that personal data is accurate and up-to-date, so that the relevant changes to Çalık Group (Büyükdere Cd No: 163 34394 Zincirlikuyu address, by way of enclosing(attaching to your identification and supporting documents) by registered mail or notary public) must be notified.

12. ÇALIK HOLDİNG A.Ş. RESPONDING TO APPLICATIONS

The applications for personal data of Group companies processing activities shall be made to the relevant Group Company. It is only necessary to apply to Çalık Holding in cases where Çalık Holding is considered as data accountant within the scope of KVKK. This situation may exist when Çalık Holding collects personal data directly from the concerned person or data sharing between the related Group Company and Çalık Holding is regarded as data transfer for data responsibility under KVKK. Other than these, the applications related to the personal data processing activities deemed as the data responsibility of the related Group Company must be made to the related Group Company and not to Çalık Holding.

12.1 The Procedure and term for Çalık Group to reply applications

The persons concerned will be able to submit a request to Çalık Group for the purpose of providing access to the personal data in question dealt with by Çalık Group as soon as possible and to use the above mentioned rights. Çalık Group creates the necessary application channels to meet these access requests. The applications are responded as soon as possible and in any case within the time stipulated under KVKK.

The persons concerned will be announced by Çalık Group and they will be registered at the Data Officers' Registry when legal infrastructure is provided. The Data Officer's Representative shall conclude, as soon as possible in accordance with the nature of the requests for the processing and protection of personal data, and in any case within 30 days at the latest, free of any charges or in case of the occurrence of the conditions to be promulgated/published by the Board.

The requests made by the person concerned shall be sent to the data representative in written form or by other means as stipulated/determined by the Board, and must also be transmitted by enclosing the identity of the

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data holder with the confirmation and authenticating documents. The applications shall be made in written form until a method has been established by the Board. It is clear that the right to use the right is clearly stated in the application to be made and if so, the relevant information and documents shall be sent to Çalık Holding A.Ş. at Büyükdere Cd. No: 163, 34394, Zincirlikuyu - Istanbul headquarters address shall be sent via registered letter or notary public.

The requests which are made by the person concerned shall be denied by the representative of the data representative by acceptance or justification and the reply shall be notified in written or electronic form. If the application is accepted, it will be carried out/fulfilled by Çalık Group and if the application is due to the fault of Çalık Group, the fee amount is going to be returned to the related person. In some cases regarding the processing / amendment/ deletion of personal data, the requests are not responded positively due to legal obligations or other reasons determined in accordance with Articles 5 and 6 of KVKK. In this case the reasons for rejection will be justified in detail and the legal basis will be declared accordingly.

If the application is rejected by Çalık Group, should the answer is found to be inadequate, the person has the right to lodge a complaint before the Board within 30 days from the date on which the person has learned the answer and in any case within 60 days from the date of application.

12.2 The information which Çalık Group may request from the Applicant

Çalık Group may request information from the person concerned so as to determine whether the applicant has personal data or not. In order to clarify the circumstances of the application of the personal data owner, Çalık Group may address questions related to the applicant's personal data.

12.3 The right of Çalık Group to reject/deny yhr Personal Data Holder's application

Çalık Group may decline the applicant's application in cases listed below provided that the grounds related are announced:

- The processing of personal data by the natural persons in their entirety or by family members living in the same house, provided that the personal data are not given to the third persons and the obligations related to data security are complied with,
- The processing of personal data by means of the official statistics such as research, planning and statistics by means of anonymity,
- The processing of personal data in the context of art, history, literature or scientific purposes or freedom of expression, provided that personal data do not either infringe or constitute a crime against national defense, national security, public safety, public order, economic security, private confidentiality,
- Processing of personal data within the scope of preventive, preventive and protective activities carried out by public institutions and organizations that are authorized by law and authorized to provide national defense, national security, public security, public order or economic security,
- The processing of personal data by the judicial authorities or execution officials in respect of investigation, prosecution, trial or execution,
- The prevention of crime or the need for criminal investigation of the personal data processor,
- The processing of personal data rendered public by the personal data owner himself,
- It is necessary for the disciplinary investigation or prosecution of the execution of the supervision or regulation duties of the public authorities and the public institutions and public institutions in accordance with the authorization given by law of the personal data processor,
- The fact that the personal data processor is required and necessary for the protection of the economic and financial interests of the State in relation to budget, tax and financial matters,
- If the claim of the personal data holder is likely to hinder the rights and freedoms of others,
- The disproportionate effort required,
- If the information requested is any public information.

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13. THE RELATIONSHIP OF THE PROTECTION AND PROCESSING OF PERSONAL DATA POLICY OF ÇALIK GROUP WITH THE OTHER POLICIES

In addition to the sub-policies for internal use in the protection and processing of personal data, which are related to the principles set forth under the scope of this Policy, Çalık Group can also establish basic policies for the Group Companies.

The principles of Çalık Group's internal policies are aimed at providing the transparency and accountability of the data-processing activities carried out by Çalık Group and informing the public about these policies in a way which is open to the public.

14. PROMULGATION AND RETAINING OF THE DOCUMENT

This data policy will be notified/communicated to the users who have personal information together with the disclosure obligation within the scope of KVKK and will be published on the sites which are related to Çalık Group.

15. UPDATING PERIOD

In the event of a change in the economic and commercial decisions of Çalık Group or in accordance with the resolutions of the Board of the Protection of Personal Data, this status will be reported to the registered members by the way which they are registered.

16. VALIDITY

This data policy shall take effect as of the date of promulgation of this data policy and it shall continue to be effective until it is removed from the website.

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