



PERSONAL DATA PROTECTION AND PROCESSING POLICY OF ÇALIK GROUP

Document Name:

Çalık Group's Personal Data Protection and Processing Policy "Policy"

Target Audience:

Employees, prospective employees, suppliers, shareholders, company officials, employees of partner companies and all similar natural persons whose personal data are processed by Çalık Group.

Prepared by:

Çalık Holding A.Ş. Legislation and Compliance Department

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Çalık Holding A.Ş. Legal Directorate

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1. PURPOSE

Turkish Personal Data Protection Law No.6698 ("PDPL") was published on 7 April 2016 in the Official Gazette No. 29677. PDPL sets out the obligations of natural and legal persons who process personal data to protect the fundamental rights and freedoms of natural persons, including the right to privacy, which is also protected by the Constitution.

The purpose of this Policy is to frame the rules/principles governing the processing of personal data by Çalık Holding Inc. and its Group Companies (Çalık Group) and set out their obligations in order to ensure that the personal data are processed and protected in accordance with PDPL.

2. SCOPE

This Policy covers customers, real customers, prospective employees, employees, company shareholders, company officials, visitors as well as employees, shareholders and officials of partner companies, third parties and the natural persons whose data are processed via automatic or non-automated means as part of a data recording system. The policy applies to activities carried out for the processing and protection of all personal data owned or managed by Çalık Group.

It was drafted in accordance with PDPL and other relevant legislation.

Çalık Group will provide all its employees with adequate training and helpful reference materials to ensure they properly protect company assets.

This Policy delineates the basic control measures that every member of the Çalık Group is expected to know and comply with at all times.

3. DEFINITIONS AND ABBREVIATIONS

This section offers a brief explanation of special terms and phrases, concepts, abbreviations, etc. mentioned in the Policy.

Çalık: Çalık Holding A.Ş.

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

Group Company: Refers to the legal entity of Çalık Holding A.Ş. and/or companies in which its shareholders own directly or indirectly, individually or jointly, at least 50% of its capital, dividends or voting rights. This definition includes companies owned by Çalık Holding A.Ş. and/or its shareholders which fall short of meeting the above ratio, provided that a decision is taken by the Board of Directors of the relevant companies and to the extent allowed by the legislative provisions of the country in which they are based.

Employee: Çalık Group employees

Explicit Consent: Consent on a specific subject, given on an informed and voluntary basis and limited for data processing purposes.

Anonymization: A process whereby personal data can under no circumstances be traced back to an identified or identifiable natural person, not even by matching it with other data.

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Service Provider: An employee of the company (supplier, subcontractor, customer, etc.) from which/for which Çalık Group receives and/or provides services.

Personal Data Owner (Relevant Person): Natural person whose personal data is processed.

Personal Data: Any data relating to an identified or identifiable natural person.

Sensitive Personal Data: Data as referred to in section 6 of PDPL.

Processing of Personal Data: Any activities performed on data such as obtaining, recording, storing, retaining, modifying, rearranging, disclosing, transmitting, transferring, making available, classifying or blocking personal data by fully automatic or semi-automatic means, or non-automated means as part of a data recording system.

Data Processor: 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: 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 while being obliged to register with the Data Controllers Registry.

Board: Personal Data Protection Board

Institution: Personal Data Protection Institution

PDPL: Turkish Personal Data Protection Law No.6698 published on 7 April 2016 in the Official Gazette No. 29677

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

4. ROLES AND RESPONSIBILITIES

4.1 Data Controller

As per PDPL, processing of personal data covers all kinds of activities performed on data such as obtaining, recording, storing, retaining, modifying, rearranging, disclosing, transmitting, transferring, making available, classifying or blocking personal data by fully automatic or semi-automatic means, or non-automated means as part of a data recording system.

Çalık Group agrees that it is responsible for the establishment and management of the data recording system by determining the purposes and means of processing personal data registered in the database declaring that it is entitled to become a registered data controller by registering as such in Data Controllers Registry once it is open.

4.2 Data Controller Representative

When the Data Controllers Registry is established for all group companies within the Çalık Group, a representative of data controllers, who is required for the registry and will be responsible for protection and processing and safety of all personal data,

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taking the necessary data protection measures and carrying out/overseeing regular audits, shall be appointed.

4.3 Data Processor

Data processors are natural or legal persons (such as contractors, suppliers) who process personal data on behalf of Çalık Group based on the authorization granted by it.

If personal data is processed by another natural or legal person on behalf of Çalık Group, Çalık Group, in its capacity as data controller, and the data processors shall be jointly responsible for taking data safety measures. Being a data controller, Çalık Group regularly monitors the compliance of data processors with this policy to ensure that the trust it inspires in individuals who share their personal data with it is maintained in the same way by its business partners, service providers, suppliers and contractors.

5. LEGAL OBLIGATIONS

As per PDPL, Çalık Group has legal obligations in terms of the protection/processing of personal data. These obligations are classified as follows:

5.1 Disclosure Obligation

Çalık Group is obliged to inform relevant persons during the collection of personal data and to inform them of the following matters:

- Identity of the data controller and its representative, if any,
- Purposes of processing the personal data,
- To whom and for what purpose the processed personal data can be transferred,
- Methods of and legal reasons for personal data collection,
- Rights of the relevant person.

Çalık Group will inform the relevant persons of the processing of their personal data through different means under its disclosure obligation. In addition, Çalık Group attaches great importance to making public policies understandable by personal data owners. The web pages of Çalık Group Companies contain information on the above-mentioned issues/matters.

The tools to be used to inform the relevant persons are determined by internal policies.

5.2 Obligation to Provide Information

Pursuant to Section 11 of PDPL, the rights to the personal data protection of the relevant person, to whom the personal data is provided, are as specified in Section 11 of this Policy. Pursuant to Section 13 of PDPL, Çalık Group is obliged to process requests regarding these rights and notify the relevant persons, and this notification shall be made within the period specified in the legislation.

Such requests must be submitted to Çalık Group in writing by the relevant persons or by other means to be determined by the Board. Çalık Group tries to facilitate the relevant person's application process, so as not to contradict the Board's decision on the matter.

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1.3 Obligation to Provide Data Security

As the data controller, Çalık Group's obligations concerning data security arising from Section 12 of the PDPL are specified in Section 10 of this Policy.

1.4 Obligation to Register with the Data Controllers Registry

Çalık Group is obliged to register with the Data Controllers Registry within the period determined and announced by the Board, pursuant to Section 16 of PDPL.

Pursuant to Section 16/3 of PDPL, some of the Group companies may be exempted from this obligation, taking into account objective criteria to be determined by the Board of Directors, such as the type and number of the processed data, the legal basis of the data processing or disclosure to third parties.

6. CLASSIFICATION OF PERSONAL DATA

6.1 Personal Data

PDPL defines personal data as any data relating to an identified or identifiable natural person. In this context, the person's data must be identified or identifiable (finding the person when combined with other information). A person's name, surname, date and place of birth, identity, social security number, telephone number, address, images, payment information, health information and similar information are considered personal data.

PDPL strictly applies to natural persons, leaving out legal entities. For this reason, data that does not contain information about a natural person, such as a legal person's registration number, trade name and registration information, is not protected under PDPL.

6.2 Sensitive Personal Data

Sensitive personal data refers to information, the disclosure of which may lead to the data subject being harassed or discriminated against. As per the first paragraph of Section 6 of PDPL, sensitive personal data covers race, ethnic origin, political opinion, philosophical belief, religion, religious denomination or other beliefs, appearance and clothing, association, foundation or trade union membership, health, sex life, criminal convictions and data on security measures, as well as biometric and genetic data. It is prohibited to process sensitive personal data without the explicit consent of the person concerned, except in cases expressly authorized by law.

In this context, such personal data will not be processed by Çalık Group, except in cases where it is allowed to be processed in accordance with PDPL, or it is processed with the explicit consent of the person concerned in accordance with the conditions specified in Section 6 of PDPL.

7. PERSONAL DATA PROCESSING POLICY

7.1 Rules concerning personal data processing

All collected personal data must be processed in accordance with the principles listed in Section 4 of PDPL and in accordance with the conditions set forth in Sections 5 and 6. Çalık Group, pursuant to Section 4 of PDPL, is responsible for processing and keeping personal data in accordance with the law and rules of honesty as well as accuracy and for current, specific, clear and legitimate purposes, in connection with the defined purposes, to a limited and appropriate extent, as specified in the relevant legislation or as required for the purpose for which they are processed.

This means;

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- Çalık Group is obliged to act in accordance with the principles stipulated by the laws and other legal regulations during the processing of personal data.
- Çalık Group shall be transparent during the processing of personal data and comply with the the disclosure and information obligation, as per rules of honesty.
- Çalık Group shall process personal data for legitimate and specific reasons, that is, for limited purposes that are clearly legal, specific and lawful.
- Çalık Group shall process personal data within the context of business activities it carries out.
- Çalık Group shall process personal data to the extent necessary. In this context, the principle of proportionality should be taken into account and personal data should not be used other than for the intended purposes. In addition, the processing of personal data that is not strictly necessary for intended purposes must be avoided.
- Çalık Group shall keep personal data for lengths of time stipulated in the relevant legislation or to the extent necessary for the purpose for which they are processed (see Section 9), but must not keep this data without anonymization for any reason, despite the expiry of this period. If no period is determined in the legislation regarding personal data, reasonable retention periods should be determined by taking into account the purpose of data use and company procedures, and the data should be strictly kept for this length of time. Following the expiry of the aforementioned periods, personal data should be deleted, destroyed or anonymized in accordance with the company procedures.

7.2 Purposes of Çalık Group for Processing Personal Data

Çalık Group processes personal data and sensitive personal data as set forth in Section 5 and 6 of PDPL, strictly limited to the purposes/conditions set forth therein. These purposes and conditions are as follows:

- It is clearly stipulated in the law that Çalık Group engages in the processing of personal data,
- Processing of personal data by Çalık Group is directly related to and necessary for the establishment or performance of a contract,
- Processing of personal data is mandatory for Çalık Group to fulfill its legal obligations,
- Processing of personal data by Çalık Group in a limited manner for the purpose of making it public, provided that it has been made public by the relevant persons,
- Processing of personal data by Çalık Group is mandatory for the establishment, exercise or protection of the rights of Çalık Group or relevant persons or third parties,
- It is mandatory to process personal data for the legitimate interests of Çalık Group, provided that it does not harm the fundamental rights and freedoms of the relevant persons,

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- Personal data processing by Çalık Group is mandatory for the protection of the life or physical integrity of the personal data owner or anyone else, and in which case the personal data owner is unable to express his consent due to actual or legal invalidity,
- It is stipulated in the laws in terms of sensitive personal data other than the health and sexual life of the personal data owner,
- In terms of sensitive personal data regarding the health and sexual life of the personal data owner, it includes processing of data by persons or authorized institutions and organizations that are under the obligation of confidentiality, for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

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

- Planning, auditing and execution of the information security process,
- Planning and execution of corporate sustainability activities,
- Event management,
- Management of relations with business partners or suppliers,
- Carrying out the personnel procurement process of Çalık Group,
- Supporting the personnel procurement process of the Holding and Group Companies,
- Execution/follow-up of Çalık Group's financial reporting and risk management transactions,
- Execution/follow-up of Çalık Group's legal affairs,
- Planning and execution of corporate communication activities,
- Planning and execution of corporate governance activities,
- Realization of corporate and partnership law transactions,
- Request and complaint management process,
- Ensuring the upholding of Çalık Group's values,
- Assisting Group Companies in complying with the relevant legislation,
- Supporting the planning and execution of fringe benefits and profits to Çalık Group's senior executives,
- Planning and execution of audit activities to ensure that the activities of Group Companies are carried out in accordance with Çalık Holding's procedures and relevant legislation,
- Assisting Group Companies in the execution of company and partnership law transactions,
- Undertaking actions to protect the reputation of Çalık Group,
- Managing investor relations,
- Giving information to authorized institutions based on legislation,
- Creating and tracking visitor records,
- Camera recording and entry-exit recordings in designated areas in order to ensure security.

If the processing of data carried out for the aforementioned purposes does not meet any of the conditions stipulated under PDPL, Çalık Holding requests the explicit consent of the relevant person regarding the processing of data.

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7.3 Ensuring a Lawful Basis for the Processing of Personal Data

- Çalık Group is responsible for: taking the following technical measures for the processing of personal data on legal grounds,
- Making in-house arrangements for the legal processing and storage of personal data,
- Establishing the technical infrastructure to ensure the security of databases where personal data are to be stored,
- Ensuring the supervision of the technical infrastructure and processes created,
- Establishing procedures for reporting the technical measures taken and audit processes

Çalık Group also takes the following administrative measures to provide a legal basis for processing personal data:

- Informing and training company employees on the protection and processing of personal data in accordance with the law,
- Recording the measures to be taken in case of unlawful processing of personal data by company employees in contracts, documents or policies made with company employees,
- Supervising the processing of personal data by data processors and partners with whom it works.

8. PERSONAL DATA TRANSFER POLICY

8.1 Domestic Transfer of Personal Data

Çalık Group is obliged to act in accordance with the decisions and regulations stipulated in PDPL and taken by the Board regarding the transfer of personal data. Personal data and sensitive data cannot be transferred by Çalık Group to other natural persons or legal entities without the explicit consent of the relevant persons.

In cases where PDPL and other relevant legislation make it mandatory, the data may be transferred to the authorized administrative or judicial institutions and organizations in the manner prescribed by the legislation and within the limits, without the explicit consent of the relevant persons.

In addition, as stipulated in Section 8 of PDPL, in the second paragraph of Section 5 of PDPL (for example, it is compulsory for the establishment or performance of a contract or the fulfillment of a legal obligation) or as per the third paragraph of Section 6 of PDPL concerning sensitive personal data, data may be transferred without the consent of the relevant persons.

Çalık Group may transfer personal data to third parties in Turkey in accordance with the conditions stipulated in the law and by taking all necessary security measures.

8.2 Overseas Transfer of Personal Data

Çalık Group may transfer personal data processed in Turkey to third parties in the country as well as abroad, or it can transfer the data altogether to be processed and stored outside of Turkey. In exceptional cases where explicit consent is not sought for the transfer of personal data as specified in PDPL, the country to which the data is to be transferred must have adequate safety measures in place,

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in addition to the conditions around the processing and transfer of data without consent. The Board will determine whether adequate protection is provided, according to the prevailing provision of PDPL, and in the absence of sufficient protection, data controllers in Turkey and the relevant foreign country must undertake adequate protection in writing and have the permission of the Board.

8.3 Persons/Institutions Provided with Data Transfer

Authorized institutions and organizations:

Information requested by public legal entities, legally authorized private persons or organizations within the scope of the relevant legislation is shared in accordance with Section 8/1 of PDPL.

Other persons or organizations to whom personal data may be transferred for the purposes set out in Section 7.2 are as follows: Çalık Group and its subsidiaries and/or subsidiaries, jointly and severally responsible, in taking data security measures such as preserving all kinds of personal data, preventing unauthorized access and illegal processing; direct/indirect domestic/foreign affiliates, domestic/foreign organizations and other third parties which provide services to Çalık Group or make agreements, cooperate, engage in joint programs with it.

8.4 Measures Taken by Çalık Group Regarding the Legal Transfer of Personal Data

Technical measures:

- The Company takes the necessary measures to make sure personal data processed and transferred are not abused/misused by different Group Companies within Çalık Group and different departments within the said Group Companies and natural or legal persons processing data on its own behalf in accordance with the obligations/powers arising from PDPL.

Administrative measures:

- The company has its own internal policy defining the scope and purpose of the sharing as well as the access to personal data by different Group Companies within Çalık Group and different departments within the said Group Companies and natural or legal persons processing data on its own behalf in accordance with the obligations/powers arising from PDPL.

9. PERSONAL DATA STORAGE POLICY

9.1 Storage of Data for as Long as Required as Envisioned in the Relevant Legislation or for Lengths of Time to Fulfill the Purposes for which Data is Processed

Çalık Group retains the personal data it processes pursuant to Section 7 of PDPL and Section 138 of the Turkish Penal Code No. 5237, only for lengths of time stipulated in the legislation or if no such period is stipulated, for lengths of time required to fulfill the purposes for which the data is processed. The retained data will be deleted after the purpose for keeping the data is no longer relevant, and this period is 2 years on average, whereas the data intended to be kept for a longer period will remain in the system for as long as specified in the legislation.

For this reason, for each personal data, a different retention period may apply, as per the period stipulated in the relevant legislation or as required for the fulfillment of purposes for which they are processed. For example, in accordance with Section 253 of the Tax Procedure Law No. 213,

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books and documents must be kept for 5 years.

Furthermore, pursuant to the Regulation on Commercial Communications and Commercial Electronic Messages published in the Official Gazette dated 15 July 2015 and numbered 29417, in cases where the data owner's consent regarding the use of personal data for marketing or promotional purposes is withdrawn, the records of personal data should be kept for 1 year from this date. The content of the commercial electronic message and any other record concerning the communication will be kept for 3 years, to be submitted to the relevant ministry when necessary.

On the other hand, data may be processed for more than one purpose, and in such a case, the relevant data is deleted, destroyed or anonymized to be preserved when all the reasons for the processing of the relevant data no longer exist.

9.2 Measures Taken by Çalık Group Regarding the Protection of Personal Data

Personal data processed in accordance with the provisions of PDPL and other relevant legislation should be deleted, destroyed in a way that cannot be used or retrieved in any way or should be anonymized by Çalık Group, directly or upon the request of the relevant person, in case the reasons requiring its processing no longer exist. The procedures and principles regarding the destruction or anonymization of personal data in accordance with the law will be fulfilled in accordance with the principles and rules to be specified in the regulation to be issued in accordance with PDPL.

Technical measures:

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

Administrative measures:

- Çalık Group, by virtue of its responsibilities and powers arising from PDPL, informs and makes aware natural or legal persons who process personal data on behalf of the Group about the lawful retention of personal data and also ensures that they take the necessary measures so that personal data is retained and deleted, destroyed or anonymized in accordance with the law under contracts concluded with such persons.
- Çalık Group is responsible for monitoring the personal data protection activities carried out by natural or legal persons processing personal data on behalf of the Group, based on its responsibilities and powers arising from PDPL.

10. PERSONAL DATA SECURITY POLICY

10.1 Çalık Group's Obligations Concerning Data Security

Pursuant to Section 12 of PDPL, Çalık Group's obligations concerning data security as data controller are:

To prevent personal data

- from being illegally processed,
- from being illegally accessed,
- to safely store personal data,

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to take all technical/administrative measures to these ends,

- performing/having the required company audits performed,
- to take the necessary measures so that the persons who have processed personal data on its behalf or the officials working in its units do not disclose the personal data they have obtained during their duties in violation of the provisions of the law or use them for illegitimate purposes even if they leave their duties,
- to notify the person concerned and the Board in case the processed personal data is unlawfully obtained by others.

10.2 Measures Taken by Çalık Group Concerning Data Security

In order to fulfill the obligations concerning the security of personal data and to act quickly in cases where there is a security risk, Çalık Group takes the following measures:

10.2.1. Technical and administrative measures to prevent unlawful access to personal data

Technical and administrative measures to be taken by the relevant units regarding the processing, transfer and preservation of personal data are listed. In case of unlawful access to personal data by third parties despite the Çalık Group's obligation to take these measures in full and to prevent unlawful access, it takes all technical and administrative measures to protect persons whose data is compromised in accordance with the relevant legislation on the protection of personal data and the resolutions of the Board.

10.2.2. Measures to protect personal data and their control

It is periodically monitored and audited that the data recording systems used within the company are created and used in accordance with PDPL and the relevant legislation with reports being sent to authorized persons or the Board.

Çalık Group is obliged to inform and raise awareness of natural or legal persons that process personal data on its behalf about the legal protection of personal data as well as to determine provisions for the legal protection of personal data within the framework of contracts concluded with these persons.

10.2.3. Measures in case of unauthorized disclosure of personal data

Çalık Group is obliged to take measures to prevent unauthorized disclosure of personal data and to draft an internal policy to that end. In such cases, Çalık Group, as the data controller, is also obliged to inform the Board and the persons, whose personal data are disclosed in an unauthorized manner.

11. RIGHTS OF THE RELEVANT PERSON

11.1 Right of Access to Personal Data

Data owners have the right to access their personal data without being charged a fee. Therefore, Çalık Group lets the data owner know that,

- they have the right to find out whether their personal data has been processed,
- request information from the company if their personal data has been processed,

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- make inquiries about the reasons why their personal data is processed and find out whether their data is used as intended,
- make a request to acquire information about third parties,

to whom their personal data has been disclosed either home or abroad.

11.2 Right to Change or Delete Personal Data

Data owners have the right to change or delete their personal data without being charged a fee.

Accordingly, the data owner can;

- request a correction if their personal data has been processed only partially or incorrectly,
- request deletion/destruction of their data if the reasons requiring the processing of their data no longer exist,
- requesting notification of third parties to whom personal data has been transferred about the above-mentioned correction, deletion or destruction activities,
- object to an unfavorable result due to analyzing of data

exclusively through automated systems.

11.3 Ensuring the Up-to-Datedness of Personal Data

Pursuant to PDPL, there is an obligation to ensure that personal data is accurate and up-to-date when necessary; therefore, in order to keep personal data accurate and up-to-date, the relevant party is responsible for notifying Çalık Group (by registered mail to Büyükdere Cd. No: 163 34394 Zincirlikuyu or via notary public with documents confirming the relevant party's identity) about any changes to their personal data.

12. RESPONDING OF ÇALIK HOLDING A.Ş. TO APPLICATIONS

Applications regarding the personal data processing of Group Companies must be made to the relevant Group Company. An application should be made to Çalık Holding only in cases where Çalık Holding is considered a data controller under PDPL. This situation may be applicable in cases where Çalık Holding directly collects personal data from the relevant person or when data sharing between the relevant Group Company and Çalık Holding is considered a data transfer, from one data controller to another under PDPL. Apart from these, applications regarding personal data processing activities for which the relevant Group Company is the data controller must be made to the relevant Group Company, not to Çalık Holding.

12.1 Çalık Group's Process and Prescribed Timeframes for Responding to Applications

The relevant persons will be able to make a request to Çalık Group in order to provide access to the personal data processed by Çalık Group as soon as possible and to exercise the above-mentioned rights. Çalık Group provides the necessary application channels for responding to such requests. Applications are answered as soon as possible and in any case within the time stipulated in PDPL.

Relevant persons should apply to the representative to be determined by Çalık Group and announced in any case in the Data Controllers Registry when the legal infrastructure is provided. The representative of the data controller will finalize the requests regarding the processing and protection of personal data as soon as possible

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and in any case within 30 days at the latest, free of charge, or in return for the fee set in the tariff, if the process requires the levying of a fee as stipulated by the Board.

In order for this period to begin, the requests made by the relevant persons must be sent to the data representative in writing or by other methods determined by the Board, and must also be submitted by attaching documents confirming and validating the identity of the data owner. Applications must be written until another method is determined by the Board. In their application, the data owner must clearly state what right they are invoking, and send the application, which can also include any supporting documents, by registered mail to Çalık Holding A.Ş. Büyükdere Cd. No:163,34394, Zincirlikuyu -İstanbul or through a public notary.

The requests made by the data owner are accepted or rejected with an explanation by the representative of the data controller and the response is provided in print or digital form. When the application is accepted, Çalık Group takes the necessary action and if it is due to a fault of Çalık Group, the fee charged is returned to the relevant person. In some cases, requests for processing/modification/deletion of personal data may not be honored due to legal obligations or other reasons as per Section 5 and 6 of PDPL. In case of a negative response, a detailed explanation is provided with reference to legal provisions.

In the event that the request is rejected by the Çalık Group, the response is found to be insufficient or no timely response is given, the data owner has the right to file a complaint with the Board of Directors within 30 days from the date on which they receive the response or in any case within 60 days from the date of filing the request.

12.2 Information that Çalık Group May Request from the Personal Data Owner (the Applicant)

Çalık Group may request information from the relevant person in order to determine whether the applicant is the data owner. Çalık Group may inquire about the personal data owner's application in order to clarify the matters in the personal data owner's application.

12.3 Çalık Group's Right to Reject the Application of the Personal Data Owner

Çalık Group may reject the application of the applicant in the following cases by providing an explanation:

- Processing of personal data by natural persons in the context of activities concerning themselves or their family members living in the same household, provided that they are not disclosed to third parties and that data security obligations are complied with,
- Processing of personal data for purposes such as research, planning and statistics, provided that they are anonymized using official statistics,
- Processing of personal data for artistic, historical, literary or scientific purposes or in the framework of freedom of expression, provided that it does not violate national defense, national security, public safety, public order, economic security, privacy or personal rights or constitute a criminal offense,
- Processing of personal data in the context of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to maintain national defense, national security, public safety, public order or economic security,

PERSONAL DATA PROTECTION AND PROCESSING POLICY OF ÇALIK GROUP

- Processing of personal data by judicial authorities or law enforcement authorities in connection with investigations, prosecutions, judicial or enforcement proceedings,
- The processing of personal data is necessary for the prevention of crime or for criminal investigations,
- Processing of personal data made public by the data owner himself,
- The processing of personal data is necessary for the fulfillment of supervisory or regulatory obligations as well as disciplinary investigations or proceedings by authorized public institutions and organizations, and professional organizations with the status of a public institution, based on the authority vested by the laws,
- The processing of personal data is necessary for the protection of the economic and financial interests of the State in relation to budgetary, fiscal and financial matters,
- The request of the personal data owner may interfere with the rights and freedoms of others,
- Making demands that require disproportionate effort,
- The requested information is publicly available.

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

Çalık Group may establish sub-guidelines for internal use as well as basic guidelines for its Group companies regarding the protection and processing of personal data in relation to the principles set forth in this Policy.

The aim is to reflect the principles of the Çalık Group's internal policies through the policies available to the public to the relevant extent, to inform the relevant persons within this framework, and to ensure transparency and accountability with regard to the personal data processing activities carried out by the Çalık Group.

14. PUBLISHING AND STORING OF THE DOCUMENT

This Data Policy shall be communicated to users with personal data under the obligation to provide information as per PDPL, which is also to be published on websites associated with the Çalık Group.

15. UPDATING PERIODS

In case of any changes due to the economic and commercial decision of Çalık Group or the policy decisions of the Personal Data Protection Committee, our members whose data is stored will be notified in the same way they were registered.

16. ENFORCEMENT

This data policy enters into force on the date of its publication and remains in effect until it is removed from the website.

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Video is recorded by surveillance cameras installed in the entrances, dining hall, cafeteria, visitor waiting area, parking lot, security booth, hallways, elevators, open office service area in our building as well as on the building envelope to ensure occupational health and safety as well as building security with the process being monitored by the authorized units, details of which are provided below.

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Location	Detail	Number of cameras	Surveillance recording done by
Büyükdere Caddesi No: 163 34394 Zincirlikuyu, Şişli - İstanbul	Head Office	177	Administrative Affairs Department Security Unit
Keresteciler Sitesi Fatih Caddesi Ladin Sokak No:17 Merter, İstanbul	Office Building	77	Administrative Affairs Department
1.Organize Sanayi Bölgesi, 2. Cd. No:6, 1, 44900 Yeşilyurt Malatya	Factory and Office Building	573	Administrative Affairs Department
Beştepe Mahallesi Yaşam Caddesi No:7 Kat:16, AKPLAZA, 06560 Yenimahalle/Ankara	1st and 9th Floor	9	IT Manager
Büyükdere Caddesi No: 163 34394 Zincirlikuyu, Şişli - İstanbul	1st and 2nd Floor	2	Security Unit
Canoğlu Mah. Yukarı Maden Köyü, Eski Okul Binası, Artvin Merkez	Field	5	Chief Mining and Geological Engineering Department
Çıtak Mah. No:70 Bigadiç/Balıkesir	Compound Office Building	5	Information Technologies Department
Hacıömerderesi Mah. No: 240 Bigadiç/Balıkesir	Laboratory	6	
	Process Department	42	
	Security	4	Security Unit
Koçören OSB Mah.221 cad.no:9/1 Eyyübiye/Şanlıurfa	Business Units and Offices	105	Administrative Affairs Department