

## POLICY FOR PROTECTING AND PROCESSING PERSONAL DATA

### 1. Purpose of the Policy for Protecting and Processing Personal Data

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With the Policy for Protecting and Processing Personal Data herein (“**Policy**”), the intention is all regulations, measures and requirements deemed important in accordance with the Law on Protection of Personal Data no. 6698 (“LPPD”) Compliance Process to be adopted within Promar Tarım ve Tekstil Ürünleri Pazarlama A.Ş. (“**Promar**”). Within this scope, this Policy aims to guide each individual within PROMAR on how to perceptibly implement the rules put forth by the LPPD and relevant legislation as well as to inform our employees, business partners and service providers regarding our policies for the LPPD.

In this respect, PROMAR carries out the necessary adjustments in order to comply with this Policy and periodically operates its internal audit mechanisms regarding compliance in order to ensure the continuity of compliance. All necessary administrative and technical measures are taken by PROMAR with regards to the processing and protection of data in accordance with the principles set forth under the LPPD and relevant legislation, necessary trainings are provided in order to ensure the awareness of PROMAR employees, internal auditing mechanisms are established and operated, relevant compliance processes are implemented for new employees, employee candidates, interns and intern candidates and the necessary notifications and warnings are made within the scope of the LPPD. The Policy stipulates the content of all abovementioned measures and actions and assigns their implementation methods. In this context, it should be stated that PROMAR undertakes to act in accordance with all liabilities and obligations set forth by the LPPD.

This Policy, prepared by our Company, has been prepared in accordance with the LPPD and relevant legislation; and PROMAR has regulated and brought into force various directives and instructions as internal regulations within the scope of protection of personal data.

This Policy herein aims to protect all personal data of our business partners, service providers, employees and customers or employees of the companies working with us or any other persons, processed through automatic or non-automatic manners provided that they are a part of any data recording system and includes provisions to ensure the said objectives. PROMAR has the right to modify the Policy and other internal regulations and documents organized in accordance with the Policy, provided that it is in compliance with the LPPD and the personal data is protected better in accordance with the Constitution and personal rights.

### 2. Fundamental Rules Regarding the Processing of Personal Data

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PROMAR processes personal data within the framework of the following principles and rules;

- a) **Lawful basis:** PROMAR investigates the source of the personal data that it collects itself or receives from third parties and attaches importance to lawful acquisition of these in good faith.

- b) **Accurate and up-to-date, when necessary:** PROMAR attaches importance to the accuracy, up-to-datedness, non-containment of any false information of all the personal data within itself and finally, to conduct necessary updates in the event that there are changes in the personal data, when the said changes are notified to itself.
- c) **Processing for specific, explicit and legitimate purposes:** PROMAR shall only process personal data within the scope of its commercial activity and by acquiring explicit consent of the data subjects except for the situations listed in Article 5 of the LPPD, limited to the purposes set forth under the Policy. It does not process, use, or have third parties use the data other than for its own operational purpose.
- d) **Proportionate, relevant and limited to the processing purposes:** PROMAR uses personal data only to the extent that it is relevant and limited to the purpose for which they are processed and in proportion to what is necessary for its service.
- e) **Stored only for the period provisioned by relevant legislation or necessary for the processing purpose:** PROMAR stores the personal data it processes in accordance with the time periods as provided by the legislations and limited to the periods set forth in the *Policy for the Deletion, Destruction and Anonymization*. However, when the abovementioned purposes cease to exist, the personal data is deleted, destroyed or anonymized. Personal data is subjected to the necessary processes in accordance with the procedures and rules set forth under the *Policy for the Deletion, Destruction and Anonymization*.

### 3. Rights of the Data Subject Regarding the Processing of Personal Data

PROMAR attaches importance to the rights of the data subjects within the framework of compliance with the LPPD. Hereunder; the data subjects shall have the following rights with regards to the personal data processed by PROMAR in accordance with Article 11 of the LPPD, with the application form prepared by PROMAR and provided upon the request of the data subject, the data subjects shall have the right to request;

- a) To learn whether their personal data is processed or not,
- b) Relevant information in case their personal data has been processed,
- c) To learn the purpose for which their personal data has been processed and whether the personal data has been used in accordance with said purposes,
- d) To learn the third parties, domestic or abroad, to whom their personal data has been transferred,
- e) Correction of their personal data in the event that they have been processed inadequately or incorrectly,
- f) The deletion or destruction of their personal data within the framework provided by law,
- g) The notification of the transactions carried out in accordance with subparagraphs (d) and (e) to the third parties to whom personal data has been transferred,
- h) Objection to the results detrimental to themselves arising from the analysis of the processed personal data exclusively via automatic systems,

- i) Compensation for the damages that has occurred due to unlawful processing of personal data.

Applications that are received by our Company via the methods specified in our application form shall be responded to within 30 (thirty) days of the date that they reach our Company in accordance with Article 13, paragraph 2 of the LPPD and the reply shall be delivered to the data subject in writing or via electronic media.

#### **4. The Principle of Maximum Efficiency**

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In accordance with the maximum efficiency principle, the personal data processed by PROMAR shall be processed only to the extent it is necessary and adequate. In this scope; only the personal data set forth in the data inventory and listed under the Policy shall be collected by us and the unnecessary personal data shall neither be collected nor processed nor stored. Most of the personal data processed by PROMAR is transferred to the company's information systems; and unnecessary data is not saved to the system within the scope of the Policy on the Deletion, Destruction and Anonymization of Personal Data and is deleted, destroyed or anonymized. Such data may be used for statistical purposes.

#### **5. Deletion, Destruction and Anonymization of Personal Data**

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Personal data is deleted, destroyed or anonymized, automatically or upon the request of the data subject upon the expiration of legally required durations, the finalization of judicial processes or the cease of existence of the lawfulness reasons of PROMAR in accordance with Article 5 and 6 of the LPPD in line with the *Policy for the Deletion, Destruction and Anonymization of Personal Data*.

#### **6. Data Accuracy**

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The personal data stored in PROMAR's systems is, as a rule, processed upon the declaration of the data subjects and in the manner of their declaration automatically or provided that they are a part of any data recording system, via non-automatic methods. PROMAR is not liable to investigate the accuracy of the data declared by the customers of the company with which PROMAR is working as solution partners, employees and other persons or other data subjects, who have come into contact with PROMAR. The personal data declared by the data subjects are considered accurate and up to date by PROMAR. The principle of personal data being accurate and up to date is one of the principles adopted by PROMAR and our company shall update the personal data it has processed in the light of the official documents it receives or upon the request of the data subject.

#### **7. Confidentiality and Data Security**

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As PROMAR processes personal data in accordance with the principle of confidentiality and the right to privacy set forth under the Constitution as one of the fundamental rights and freedoms, and abides by the said principle and right in every stage of the data processing activity. In light of

said rule, only authorized persons within the company may access the personal data within PROMAR. All necessary technical and administrative measures are taken by PROMAR in order to protect the collected personal data and to prevent it from being accessed by unauthorized persons and to prevent the data subjects from suffering. Within this scope, it is ensured that the software is in compliance with the standards, that all work relationships established with third parties are chosen carefully and that this Policy and other internal regulations are abided by within the company. Data protection agreements or protocols are established, in scope of the confidentiality principle, between the Company and the solution partners, business partners, service providers with whom reciprocal personal data transfers are made or with any real persons and legal entities to whom data is transferred regardless of the circumstances.

## **8. Purposes of Personal Data Processing**

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PROMAR may only process personal data with the data subject's explicit consent or the existence of the lawfulness reasons as stated below:

- a) Explicitly stated by the laws.
- b) Mandatory in order to save the life or bodily integrity of a person or another's who cannot declare consent because of physical impossibility or whose consent is not legally recognized.
- c) Provided that it is directly related to the establishment or execution of an agreement, the necessity of processing of personal data of the parties of the agreement.
- ç) Mandatory in order for the data controller to fulfill legal obligations.
- d) Made public by the data subject himself/herself.
- e) Mandatory for the establishment, use or protection of a right.
- f) Mandatory for the legitimate interests of the data controller, provided that no harm comes to the fundamental rights and freedoms of the data subject..

Personal data is processed for purposes such as hiring, performance review, preparation and storage of personal files, execution of exit interview processes and the execution of other operational activities in the company within the scope of planning and executing PROMAR's Human Resources processes. Also, personal data is stored and used when necessary in line with the purposes such as future requests, necessary information which might arise out of the services, works and activities that PROMAR performs, determination of the inadequacies in order to develop PROMAR's work model.

## **9. Personal Data of Business Partners, Potential Business Partners, Service Providers and Solution Partners**

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PROMAR collects and processes certain personal data of business partners, service providers, solution partners, those residing in the locations where the sites are located that are operated within the scope of its activities and/or of the right holders and parties to other agreements within the

scope of the agreements that have been established. The personal data is processed only in line with the purpose of the agreement, provided that said personal data is directly relevant to the establishment or execution of the agreements. Personal data is processed in accordance with the necessities of the execution of the agreement and the requirements of the service and are updated when necessary by contacting the data subject.

## **10. Data Transactions Conducted Due to The Company's Legal Liability or Explicit Legal Requirements**

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Personal data may be processed without acquiring additional consent if the processing is clearly set forth so under the relevant legislation or for the purpose of fulfilling a legal obligation as specified under the legislation. The kind and scope of data processing shall be necessary for the legal data processing activity and shall be in accordance with the relevant legal requirements.

## **11. Processing Sensitive Personal Data**

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As the data subject's data regarding race, ethnic origin, political opinion, philosophical belief, religious sect or other beliefs, clothing, association, foundation or union membership, health, sexual life, penal conviction and security measures and their biometric and genetic data are considered to be sensitive personal data within the scope of the LPPD; PROMAR acts in accordance with the necessary procedures and principles set forth by the LPPD. PROMAR further takes all adequate and necessary measures as specified by the Personal Data Protection Board. The matters relating to processing and protection of sensitive personal data are specified in the *Policy for the Processing and Protection of Sensitive Personal Data*.

## **12. Personal Data of Our Employees**

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### *a. Data Processing for Employee Relationship*

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The personal data of our employees may be processed, without the employees' consent, for the purpose of continuity of the work relationship and/or as necessary for work relationships and health insurance. Even in such a situation, PROMAR ensures the protection and confidentiality of its employees' personal data and shall take the necessary administrative and technical measures for the protection of such data.

PROMAR informs its employees regarding the data processing process and the protection of personal data whilst processing the personal data of its employees, prepares necessary approval forms, provides the necessary trainings to its employees and subjects its employees to periodic tests in relation to the LPPD.

### *b. Processing as per Legal Obligations*

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PROMAR may process the personal data of its employees without taking their consent in order to fulfill legal obligations set forth by the Labor Law, Social Security Law and Work Health and Safety Law and other legislations, provided that the processing without the data subject's consent

is clearly set forth by the relevant legislation. This matter is limited to the obligations arising from the law.

#### *c. Processing for the Benefit of the Employees*

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PROMAR may process personal data without acquiring consent for transactions that are to the benefit of the employees such as private health insurance or phone subscriptions. PROMAR may process the data of its employees regarding the breaches arising out of work relationships as well.

#### *d. Processing Sensitive Personal Data*

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Personal data considered to be 'sensitive' within the scope of the LPPD may from time to time, be processed as required by the law and the specifications regarding the processing and protection sensitive personal data are set forth under the *Policy for the Processing and Protection of Sensitive Personal Data*.

#### *e. Data Processed Via Automatic Systems*

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The personal data of the employees processed via automatic systems may be used for inter-company promotions and performance evaluations. The employees shall have the right to object to the results to their detriment in accordance with Article 11 of the LPPD and their application regarding their objection shall be made in compliance with the procedures within the company. The objections of the employees are also evaluated within the company.

#### *f. Telecommunication and Internet*

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The computers, telephones, e-mail and other data recording devices assigned by PROMAR to its employees are assigned solely for work purposes. The employee may not use such devices assigned to them by the company for their personal affairs and communications, and all necessary information regarding this issue has been provided to the employees. The company may control and audit all data within these devices. The employee undertakes not to store any data or information other than work on the computers, telephones and other devices assigned to them from the commencement of work.

### **13. Transfer of Personal Data**

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Personal data, within the scope of the abovementioned purposes and when necessary for PROMAR to fulfill its legal obligations, may be shared with our business partners, suppliers, private and public institutions and official authorities.

Personal data is shared in accordance with the regulations set forth under the Articles 8 and 9 and all necessary technical and administrative measures are taken during and following the sharing process in order to ensure data security.

In accordance with Article 8 of the LPPD, personal data may be transferred with the explicit consent of the data subject or without an explicit consent, in the existence of one of the situations mentioned under Article 9 titled ‘Purposes of Personal Data Processing’.

In accordance with Article 9 of the LPPD, along with the abovementioned circumstances, the foreign country to which personal data is to be transferred shall have adequate protection. The countries with adequate protection are determined by the Personal Data Protection Board.

#### **14. Transaction Security**

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All necessary technical and administrative measures are taken by PROMAR in order to protect the collected personal data and to prevent unauthorized persons from accessing such data and to protect data subjects from suffering. Within this scope, it is ensured that the software is in compliance with the standards, the third parties with whom business relationships are established are chosen carefully and that this Policy and other internal regulations are abided by within the company. The measures for security are constantly being renewed and developed.

#### **15. Audit**

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PROMAR conducts the necessary internal and external audits regarding the protection of personal data and establishes necessary audit mechanisms for the protection of personal data.

#### **16. Notification of the Breaches**

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PROMAR, when a breach in relation to personal data is notified to it, immediately takes action in order to remedy such breach, by taking the Emergency Situation Directive into consideration. In the event of PROMAR causing a breach through its fault within the scope of the LPPD and the relevant legislation, PROMAR minimizes the damage of the data subject and compensates the damage. In the event that it is determined that personal data have been acquired by unauthorized persons from the outside, the Personal Data Protection Commission immediately notifies the Personal Data Protection Board of the situation.