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PROCESSING AND PROTECTION OF PERSONAL DATA POLICY

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CHAPTER 1 - INTRODUCTION

1.1.Introduction

Protection of personal data is among the most important priorities of **Mantagaz Denizcilik ve Ticaret Limited Şirketi** ("Mantagaz Denizcilik" or "Company") and it makes maximum efforts to comply with all applicable legislation in this regard.

Within the framework of Mantagaz Denizcilik Personal Data Protection and Processing Policy ("Policy"), the principles adopted in the execution of personal data processing activities carried out by our Company and the basic principles adopted in terms of compliance of our Company's data processing activities with the regulations contained in the Personal Data Protection Law No. 6698 ("Law") are explained and thus, our Company provides the necessary transparency by informing the personal data owners.

With full awareness of our responsibility within this scope, your personal data is processed and protected within the scope of this Policy.

1.2.Scope

This Policy pertains to all personal data of people other than our Company's employees and employee candidates, which are processed in whole or in part by automatic or non-automatic means, provided that they are part of any data recording system. The activities carried out by our Company regarding the protection of personal data of our employees are managed under the Mantagaz Denizcilik Employees Personal Data Protection and Processing Policy and Mantagaz Denizcilik Employee Candidates Personal Data Protection and Processing Policy, which are written in parallel with the principles in this Policy.

Details of the personal data processing activities carried out by our Company for employee candidates or employees of our Company can be accessed from Mantagaz Denizcilik Employee Candidates

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Personal Data Protection and Processing Policy and Mantagas Denizcilik Employees Personal Data Protection and Processing Policy, which are available at www.mantagas.com respectively.

1.3. Implementation of the Policy and Related Legislation

The relevant legal regulations in force regarding the processing and protection of personal data will primarily apply. In the event of discrepancy between the legislation in force and the Policy, our Company acknowledges that the legislation in force will take precedence. The Policy regulates the rules set forth by the relevant legislation by concretising them within the scope of Company practices.

1.4. Enforcement of the Policy

The effective date of this Policy is 01/10/2024 This Policy is published on the website of Mantagas Denizcilik www.mantagas.com and made available to the relevant persons upon the request of the personal data owners.

SECTION 2 - MATTERS RELATED TO THE PROTECTION OF PERSONAL DATA

2.1. Ensuring the Security of Personal Data

In accordance with Article 12 of the Law, our Company takes the necessary measures according to the nature of the data to be protected in order to prevent unlawful disclosure, access, transfer or other security deficiencies that may occur in other ways. In this context, our Company takes administrative measures to ensure the necessary level of security in accordance with the guidelines published by the Personal Data Protection Board ("Board"), conducts audits or has them conducted.

2.2. Protection of Special Categories of Personal Data

The Law attributes special importance to certain personal data due to the risk of causing individuals harm or discrimination when processed unlawfully. These data include race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, association,

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foundation or trade union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data. Our Company handles the protection of “special categories” of personal data, as defined by the Law, with particular care when processed lawfully.

In this context, the technical and administrative measures taken by our Company for the protection of personal data are carefully implemented in terms of special categories of personal data and necessary audits are provided within our Company. Detailed information on the processing of special categories of personal data is provided in section 3.3. ("Processing of Special Categories of Personal Data") of this Policy. In addition, details can be found in the Mantagas Policy on Processing and Protection of Special Categories of Personal Data, which is organised to take adequate measures for the protection of special categories of personal data.

2.3. Increasing Awareness and Monitoring of Protection and Processing in Business Units

Our Company ensures that necessary trainings are organised for business units in order to raise awareness to prevent unlawful processing of personal data, unauthorized access to personal data, and to ensure the protection of personal data.

Necessary systems are established in order to raise awareness of our Company's employees on the protection of personal data, and we work with consultants in case of need on the subject. In this regard, our Company evaluates the participation in relevant trainings, seminars and information sessions and updates and renews its trainings in parallel with the updating of the relevant legislation.

SECTION 3 - MATTERS RELATED TO THE PROCESSING OF PERSONAL DATA

3.1. Processing of Personal Data in Compliance with the Principles Stipulated in the Legislation

3.1.1. Processing in accordance with the Law and Integrity Principles

Our Company adheres to the principles established by legal regulations and the general rule of trust and honesty in the processing of personal data. Within this framework, personal data are processed only to the extent and limited to the extent required by the business activities of our Company.

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3.1.2. Ensuring that Personal Data is Accurate and Up-to-Date When Necessary

Our Company takes the necessary measures to ensure that personal data remains accurate and up-to-date throughout the period of processing and establishes the mechanisms to ensure the accuracy and currency of personal data at regular intervals.

3.1.3. Processing for Specific, Explicit and Legitimate Purposes

Our company clearly sets out the purposes of processing personal data and processes it within the scope of purposes related to these activities in line with business activities.

3.1.4. Being relevant, limited and proportionate to the purpose for which they are processed

Our Company collects personal data only to the extent and nature required by business activities and processes it only for the specified purposes.

3.1.5. Preservation for the Period Stipulated in the Relevant Legislation or the Purpose for which it was Processed

Our Company retains personal data for the period required for the purpose for which it was processed and for the minimum period stipulated in the legal legislation to which the relevant activity is subject. In this context, our Company first determines whether a period of time is stipulated for the storage of personal data in the relevant legislation, and if a period is determined, it acts in accordance with this period. If no legal period exists, personal data is retained for the period required for the purpose for which it was processed. Personal data is destroyed at the end of the specified storage periods in accordance with the periodic destruction periods or in accordance with the data owner's application and with the specified destruction methods (deletion and/or destruction and/or anonymisation).

3.2. Conditions for Processing Personal Data

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Aside from the explicit consent of the personal data owner, the basis of the personal data processing activity may be based on one of the following conditions, or more than one condition may be the basis of the same personal data processing activity. In the event that the processed data is personal data of special nature, the conditions set out in section 3.3 of this Policy ("Processing of Personal Data of Special Categories") shall apply.

i. Explicit Consent of the Personal Data Owner

One of the conditions for processing personal data is the explicit consent of the data subject. The explicit consent of the personal data owner must be related to a specific subject, based on information and free will. Personal data can be processed without the need for explicit consent of the , owner of the personal data in the presence of the conditions listed below.

ii. Explicitly stipulated in the Laws

If the personal data of the data subject is explicitly stipulated in the law, in other words, if there is a clear provision in the relevant law regarding the processing of personal data this condition for data processing is deemed to be met.

iii. Failure to Obtain the Explicit Consent of the Relevant Person Due to Actual Impossibility

The personal data of the data subject may be processed if it is mandatory to process the personal data of the person who is unable to disclose his/her consent due to actual impossibility or whose consent cannot be recognised as valid, in order to protect his/her or another person's life or physical integrity.

iv. Direct Relevance to the Establishment or Performance of the Contract

Provided that it is directly related to the establishment or performance of a contract to which the data subject is a party, this condition may be deemed to be fulfilled if the processing of personal data is necessary.

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v. Fulfilment of Legal Obligations by the Company

Personal data of the data subject may be processed if the processing is mandatory for our Company to fulfil its legal obligations.

vi. Publicisation of Personal Data by the Personal Data Owner

If the data subject has made their personal data public, the relevant personal data may be processed solely for the purpose of making it public.

vii. Data Processing is Mandatory for the Establishment or Protection of a Right

Personal data of the data subject may be processed if data processing is mandatory for the establishment, use or protection of a right.

viii. Data Processing is Mandatory for the Legitimate Interest of our Company

Provided that it does not harm the fundamental rights and freedoms of the personal data owner, the personal data of the data owner may be processed if data processing is mandatory for the legitimate interests of our Company.

3.3. Processing of Special Categories of Personal Data

Special categories of personal data are processed by our Company in accordance with the principles outlined in this Policy, and by taking all necessary administrative and technical measures, including the methods to be determined by the Board, under the following conditions:

- i. Special categories of personal data other than health and sexual life may be processed without the explicit consent of the data subject if it is explicitly stipulated in the law, in other words, if there is an explicit provision regarding the processing of personal data in the law to which the

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relevant activity is subject. Otherwise, the explicit consent of the data subject shall be obtained for the processing of such special categories of personal data.

- ii. Special categories of personal data related to health and sexual life may be processed by persons or authorised institutions and organisations 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, without seeking explicit consent. Otherwise, the explicit consent of the data subject shall be obtained for the processing of such special categories of personal data.

3.4. Informing the Personal Data Owner

Our Company enlightens personal data subjects in accordance with Article 10 of the Law and secondary legislation. In this context, our Company informs the relevant persons about the purposes for which personal data are processed by whom as the data controller, for what purposes, with whom they are shared for what purposes, by which methods they are collected and the legal reason and the rights of data subjects within the scope of processing their personal data.

3.5. Transfer of Personal Data

Our Company may transfer personal data and special categories of personal data of the personal data owner to third parties (third party companies, public and private authorities, third real persons) by taking the necessary security measures in line with the personal data processing purposes in accordance with the law. In this respect, our Company acts in accordance with the regulations stipulated in Article 8 of the Law.

3.5.1 Transfer of Personal Data

Even without the explicit consent of the personal data owner, if one or more of the belowmentioned conditions exist, personal data may be transferred to third parties by our Company by taking due care and taking all necessary security measures, including the methods stipulated by the Board.

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- The relevant activities regarding the transfer of personal data are clearly stipulated in the laws,
- The transfer of personal data by the Company is directly related and necessary for the establishment or performance of a contract,
- The transfer of personal data is mandatory for our Company to fulfil its legal obligations,
- Transfer of personal data by our Company limited to the purpose of publicisation, provided that the personal data has been made public by the data subject,
- The transfer of personal data by the Company is mandatory for the establishment, use or protection of the rights of the Company or the data owner or third parties,
- It is mandatory to carry out personal data transfer activities for the legitimate interests of the Company, provided that it does not harm the fundamental rights and freedoms of the data owner,
- It is necessary for the protection of the life or bodily integrity of the person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid.

In addition to the above, personal data may be transferred to foreign countries declared by the Board to have adequate protection ("**Foreign Country with Adequate Protection**") if any above conditions are met. In the absence of adequate protection, in accordance with the data transfer conditions stipulated in the legislation, personal data may be transferred to foreign countries where the data controllers in Turkey and the relevant foreign country undertake adequate protection in writing and where the Board has authorisation ("**Foreign Country Where the Data Controller Guarantees Adequate Protection**").

3.5.2. Third Parties to whom Personal Data are Transferred and Purposes of Transfer

Your personal data may be transferred to the categories of recipients below:

- Company officials,
- Legally authorised public institutions and organisations,
- Legally authorised private law entities.

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The scope of the above-mentioned persons to whom data is transferred and the purposes of data transfer are stated below.

Persons to whom data can be transferred	Definition	Purpose of Data Transfer
Company Official	Company board members and other authorised real persons	Limited to the design of strategies related the Company's commercial activities and for audit purposes, in accordance with the provisions of the relevant legislation,
Legally Authorised Public Institutions and Organisations	Public institutions and organisations authorised to receive information and documents from the Company under the relevant legislation	Limited to the purpose requested within the legal authority of the relevant public institutions and organisations
Legally Authorised Private Law Entities	Private law entities authorised to obtain information and documents from the Company under the relevant legislation	Limited to the purpose requested within the legal authority of the the relevant private law entities.

3.5.3. Transfer of Personal Data Abroad

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Personal data may be transferred to foreign countries declared by the Board to have adequate protection. If adequate protection is not in place, personal data may still be transferred to foreign countries where the data controllers in both Turkey and the relevant foreign country undertake in writing to ensure adequate protection and where the Board grants permission.

3.5.4. Transfer of Special Categories of Personal Data

Special categories of personal data may be transferred by our Company in accordance with the principles set out in this Policy while taking all necessary administrative and technical measures, including the methods to be determined by the Board, and under the following conditions:

- i. Special categories of personal data other than those related to health and sexual life may be processed without seeking the explicit consent of the data subject if it is explicitly stipulated in the law, in other words, if there is a clear provision in the relevant law regarding the processing of personal data. Otherwise, the explicit consent of the data subject shall be obtained.
- ii. Special categories of personal data related to health and sexual life may be processed without seeking explicit consent by persons or authorised institutions and organisations under the obligation of confidentiality for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and managing health services and their financing. Otherwise, explicit consent of the data subject shall be obtained.

In addition to the above, personal data may be transferred to **"Foreign Countries with Adequate Protection"** in the presence of any of the above conditions. In the absence of adequate protection, personal data may be transferred to **"Foreign Countries Where the Data Controllers Commit to Providing Adequate Protection"** in accordance with the data transfer conditions stipulated in the legislation.

SECTION 4 - CATEGORISATION AND PURPOSES OF PROCESSING PERSONAL DATA BY OUR COMPANY

In accordance with Article 10 of the Law and secondary legislation, personal data subjects are informed, and personal data is processed by our Company in line with the purposes of processing personal data.

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The processing is carried out, based on and limited to at least one of the conditions specified in Articles 5 and 6 of the Law. Additionally, personal data is processed with the general principles outlined in Article 4 of the Law, especially regarding the processing of personal data.

4.1. Categorisation of Personal Data

Personal Data Categorisation	Personal Data Categorisation Description
Identity Information	Data containing information about the identity of the person; name-surname, Turkish ID number, nationality, place of birth, date of birth, gender, workplace information, registration number, tax number, title, biography, etc. as well as documents like driver's licence, professional ID, identity card and passport.
Contact Details	Information such as telephone number, address, e-mail address, fax number etc.
Transaction Security Information	Personal data processed to ensure our technical, administrative, legal and commercial security during the execution of our activities (e.g. log records, IP information, authentication information)
Transaction Information	Data processed in connection with service provided by our Company or to protect the legal and other interests of the Company and the data owner, such as survey data, declaration information, shopping records, call centre recordings, membership information, cookie records etc.
Physical Space and Security Information	Personal data related to the records and documents collected upon entering or staying within a physical space; such as camera records, records taken at the security point, etc.

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Audio/Visual Information	Daha such as photographs and camera recordings (excluding recordings within the scope of Physical Space Security Information), voice recordings and data contained in documents that are copies of documents containing personal data
Family Members and Relatives	Information about family members (e.g. spouse, mother, father, child), relatives and other individuals who can be contacted in case of emergency within the framework of the activities carried out by our Company, related to the services provided or processed to protect the legal and other interests of the Company and the personal data owner
Personal Data of a Special Category	Data concerning individual's race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data.
Financial Information	Personal data processed regarding information, documents and records showing all kinds of financial results created according to the type of legal relationship established by our company with the personal data owner, and data such as bank account number, IBAN number, income information, debt /creditinformation.
Audio/Visual Information	Photographs and camera recordings (excluding recordings within the scope of Physical Space Security Information) and sound recordings
Knowledge of Legal Procedure and Compliance	Personal data processed within the scope of determination and follow-up of our legal receivables and rights and performance of our debts and compliance with our legal obligations and our Company's policies

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Audit and Inspection Information		Personal data processed for the execution of operational, financial, fraud and compliance audit activities of our company
Request/Complaint Information	Method	Personal data related to receipt and evaluation of any requests or complaints directed to our Company, processed through automatic or non-authomatic means as part of the data recordation system.

4.2. Purposes of Processing Personal Data

MAIN OBJECTIVES (PRIMARY)	SUB-OBJECTIVES (SECONDARY)
Planning and Execution of the Company's Human Resources Policies and Processes	Execution of Personnel Recruitment Processes
Execution of necessary activities by our relevant business units to Carry Out Commercial Activities	Event Management
	Planning and Execution of Corporate Communication Activities
	Planning, Auditing and Execution of Information Security Processes
	Establishment and Management of Information Technologies Infrastructure
	Follow-up of Finance and/or Accounting Affairs
	Planning and Execution of Corporate Sustainability Activities

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	Planning and/or Execution of Activities for Performing Effectiveness/Efficiency and/or Relevance Analyses of Business Activities
	Corporate Governance Planning and Execution of Activities
Planning and Execution of the Company's Commercial and/or Business Strategies	Management of Relations with Business Partners and/or Suppliers
	Execution of Strategic Planning Activities
Ensuring the legal, technical and commercial-business security of the Company and related persons	Legal Case Tracking
	Creation and Tracking of Visitor Records
	Planning and Execution of Operational Activities to Ensure that Company Activities are Carried Out in Accordance with Company Procedures and/or Relevant Legislation
	Ensuring the Security of Company Assets and/or Resources
	Ensuring the Security of Company Operations
	Providing Information to Authorised Institutions in Compliance with Legal Requirements
	Ensuring the Security of Company Premises and/or Facilities

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	Execution of Corporate and and Partnership Law Transactions
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SECTION 5- RETENTION AND DESTRUCTION OF PERSONAL DATA

Our Company retains personal data for the period required for the purpose for which they are processed and for the minimum durations stipulated in the legal legislation to which the relevant activity is subject.

In this context, our Company firstly determines whether a period of time is stipulated for the storage of personal data in the relevant legislation, and if a period is determined, it acts in accordance with this period. If no legal period is specified, personal data is retained for the duration necessary to fulfill the purpose for which it was processed.

Personal data are destroyed at the end of the specified storage periods in accordance with the periodic destruction periods or in accordance with the data owner's application and with the specified destruction methods (deletion and/or destruction and/or anonymisation). Details regarding the storage and destruction of personal data can be found in the "Mantagas Personal Retention and Destruction Policy".

SECTION 6 - LEGAL RIGHTS OF THE PERSONAL DATA SUBJECT REGARDING THE PERSONAL DATA COLLECTED ABOUT HIM/HER

6.1. Legal Rights of the Personal Data Owner

The Personal Data Owner has the following rights:

- (1) To learn whether personal data is processed or not,
- (2) To request information if personal data has been processed,
- (3) To learn the purpose of processing personal data and whether it is being used in accordance with its purpose,
- (4) To know the third parties to whom personal data are transferred domestically or abroad,

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(5) To request correction of personal data if its incomplete or incorrectly processed, and to request notification of the correction to third parties to whom personal data has been transferred,

(6) To request the deletion or destruction of personal data even though it has been processed in accordance with the Law and other relevant legal provisions, in the event that the reasons requiring its processing no longer exist, and to request that third parties to whom the personal data has been transferred be notified of this action,

(7) To object to the occurrence of any unfavorable result through the analysis of processed data exclusively by automated systems,

(8) In case of damage due to unlawful processing of personal data, to demand the compensation of the damage.

6.2. Principles for the Personal Data Owner to Exercise his/her Legal Right

You may submit your requests regarding your rights under Article 11 of Law No. 6698 regulating the "Rights of the Relevant Person" and the application of the law to our address crewing@mantagas.com in writing or by using the registered electronic mail (KEP) address or the electronic mail address you have previously notified to our website and registered in our system or in accordance with other application procedures stipulated in the [Communiqué on Application Procedures and Principles to the Data Controller](#). We will conclude your request as soon as possible and within a maximum 30 (thirty) days, free of charge, for up to ten pages - depending on its nature.

SECTION 7 - PROCESSING OF PERSONAL DATA IN SPECIAL CASES

7.1. Building, Facility Entrances and Personal Data Processing Activities Conducted within the Building Facility and Website Visitors

. Our Company conducts personal data processing activities to ensure security by monitoring entrances and exits at company buildings and facilities via security cameras and tracking visitor access.

7.2. Camera Surveillance Activities Carried Out at the Entrances of Company Buildings, Facilities and Inside

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Our Company carries out camera surveillance activities in accordance with the Law on Private Security Services and the relevant legislation in order to ensure security in its buildings and facilities. Our Company carries out security camera monitoring activities in order to ensure security in its buildings and facilities, for the purposes stipulated in the relevant legislation in force and in accordance with the personal data processing conditions listed in the Law.

In accordance with Article 10 of the Law, the personal data owner is informed by our Company by more than one method regarding the camera surveillance activity. In addition, in accordance with Article 4 of the Law, our Company processes personal data in a limited and measured manner in connection with the purpose for which they are processed. The purpose of the video camera surveillance activity carried out by our Company is limited to the purposes listed in this Policy.

Accordingly, the monitoring areas, the number of surveillance cameras and the time of surveillance are sufficient to achieve the security purpose and are limited to this purpose. Areas that may result in interference with the privacy of the person in a way that exceeds the security purposes (for example, toilets) are not subject to monitoring. Only a limited number of employees of our Company have access to the records recorded and stored in digital media with live camera images. The limited number of people who have access to the records declare that they will protect the confidentiality of the data they access with a confidentiality undertaking.

7.3. Tracking of Guest Entries and Exits at the Company's Buildings and Facilities

Our Company processes personal data processing activities for the purposes of ensuring security and for the purposes specified in this Policy, for the tracking of guest entrances and exits in the Company buildings and facilities.

While obtaining the names and surnames of the individuals visiting our Company's buildings, as guests are obtained or through the texts posted in our Company or otherwise made available to the guests, the personal data owners in question are enlightened within this scope. The data obtained for the purpose of tracking guest entry-exit are processed only for this purpose and the relevant personal data are recorded in the data recording system in physical environment.