

	INTEGRATED MANAGEMENT SYSTEM MANUAL		Issue No.: 01
	Chapter 06		Issue Date: 01/10/2024
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POLICY FOR THE PROTECTION AND PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA

SECTION 1 - PURPOSE AND BASIS

The purpose of this policy is to establish the procedures and principles for the processing of special category personal data as defined in Article 6/1 of the Personal Data Protection Law No. 6698 (KVKK), and to implement the technical and administrative measures necessary to ensure an appropriate level of security in processing these data.

This Policy has been prepared in compliance with the KVKK and the decisions of the Personal Data Protection Board regarding the processing of special category personal data, as well as secondary legislation under the KVKK.

SECTION 2 – SCOPE

This Policy applies to special categories of personal data of all Company employees, job candidates, service providers, visitors, suppliers, customers, potential customers, and other third parties whose special category personal data are processed, as well as the systems, applications, services, and processes where such data is processed.

This Policy is applied to all activities involving the processing of special categories of personal data for which our Company acts as the data controller.

SECTION 3 - CONDITIONS FOR THE PROCESSING OF SPECIAL CATEGORY PERSONAL DATA

Our Company processes special categories of personal data based on the fundamental principles outlined in the Law and the legal grounds specified in the Law and its secondary regulations.

3.1. Basic Principles in the Processing of Special Category Personal Data

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Special categories of personal data can only be processed for specific, explicit, and legitimate purposes. Thus, the purpose for processing such data must be determined.

The processing of special categories of personal data must be relevant, limited, and proportionate to the identified purpose. The processing of data must be necessary for achieving the intended purpose. Special categories of personal data not related to or required for the intended purposes should not be processed.

In all processing activities of special categories of personal data, the principles of legality and fairness must be adhered, including:

- The processing of special category personal data must be based on legitimate grounds.
- Special category personal data must not be used against individuals without a legitimate reason.
- Transparency must be maintained in the processing of special category personal data, and individuals must be informed accordingly.
- Special category personal data must be processed in line with the reasonable expectations and predictions of individuals.

Special categories of personal data must be accurate and, where necessary, kept up to date. Mechanisms are established to ensure the accuracy and timeliness of data, and these mechanisms are kept open.

Special category personal data that has lost its accuracy or relevance will be processed in accordance with the procedures and principles set out in the Regulation on the Deletion, Destruction, or Anonymization of Personal Data and our Company's Personal Data Retention and Destruction Policy.

Special category personal data must be retained only for the period specified in the relevant legislation or as necessary for the purpose for which they are processed. Accordingly, if a retention period is specified in the relevant legislation, it will be followed; otherwise, the data will be retained only for the necessary period for the purpose for which they are processed. The required processing period determined by process owners is recorded in the "Personal Data Processing Inventory."

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3.2. Legal Grounds for the Processing of Special Category Personal Data

- **Processing as required by legal provisions:**

With the requirement that adequate measures determined by the Board are taken, in cases stipulated by legal regulations, special category personal data other than health and sexual life data may be processed without seeking the explicit consent of the individual concerned in line with the provisions of the KVKK. In such cases, the data processing activities carried out by our Company will be limited to the requirements of the relevant legislative provision.

- **Processing of special category personal data related to health and sexual life:**

Under the KVKK, special category of personal data concerning health and sexual life may only be processed with explicit consent or in cases where explicit consent is not available, such data may only be processed by individuals or authorized institutions and organizations subject to a confidentiality obligation, for purposes such as the protection of public health, preventive medicine, medical diagnosis, treatment, and care services, as well as the planning and management of health services and financing.

In such cases, our Company may process special category personal data related to the health of individuals to the extent required by relevant legislative provisions and under confidentiality obligations.

- **Explicit consent of the data subject:**

If none of the conditions for processing special categories of personal data mentioned above are met, our Company may obtain the explicit consent of the individual concerned. In these cases, special categories of personal data will be processed by our Company only after informing the data subject and obtaining their explicit consent (limited to this issue).

- **Adequate precautions for processing special categories of personal data:**

To process special category personal data, it is mandatory to take the measures determined by the Board in accordance with the KVKK. Our Company will process special category personal data in line with the precautions determined by the Board.

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SECTION 4 - MEASURES FOR EMPLOYEES INVOLVED IN THE PROCESSING OF SPECIAL CATEGORY PERSONAL DATA

4.1. Employee Training and Awareness

Employees are provided with regular training on KVKK and related legislation and special personal data security issues by the relevant unit in line with the coordination/decisions of the KVK Committee.

4.2. Confidentiality Agreements

Employees involved in the processing of special categories of personal data are required to sign confidentiality agreements, as coordinated/decided by the Personal Data Protection Committee and executed by the responsible department head, with notification to the Human Resources Department.

4.3. Scope, Duration, and Supervision of Access Authorization for Special Category Personal Data

The special category personal data that users can access, and process will be limited to the activities they carry out as part of their job descriptions, within the framework of KVKK, our Company's Personal Data Protection and Processing Policy, and other relevant legislation. Authorizations will be clearly defined and limited, and periodic authority checks will be conducted as coordinated by the KVK Committee. If there is a change of duty or termination of employment, the employee's access will be immediately revoked, and any items containing special category personal data will be retrieved.

The relevant unit will audit the appropriateness of user account/role/authorization assignments with the Company's job descriptions.

SECTION 5. MEASURES FOR THE ENVIRONMENTS WHERE SPECIAL CATEGORIES OF PERSONAL DATA ARE PROCESSED, STORED, AND/OR ACCESSED

5.1 Electronic Environments

The storage of special categories of personal data using cryptographic methods:

The electronic environments where special categories of personal data are processed, stored, and/or accessed must:

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- Be stored using cryptographic methods that comply with our company's Information Security Standards,
- If such data is transferred to a cloud environment, is necessary, the responsibility for creating and maintaining the technical infrastructure for encrypted transfer lies with the relevant department, in accordance with applicable regulations,
- All necessary measures will be taken by our company to securely store cryptographic keys in different environments,
- All actions performed on the data will be securely logged by our company and the relevant department,
- Security updates for the environments where the data is stored will be continuously monitored, necessary security tests will be regularly conducted or arranged, and the test results will be recorded,
- If special categories of personal data are accessed through software in the electronic environments or systems where they are processed, stored, and/or accessed, user authorizations for the software will be configured, necessary security tests will be regularly conducted or arranged, and the test results will be recorded,
- If remote access to the data is required, at least a two-factor authentication system will be provided by our company.

5.2 Physical Environments

Security measures to be taken according to the nature of the environment where special categories of personal data are stored:

In the physical environments where special categories of personal data are processed, stored, and/or accessed, all necessary security measures will be taken to protect against risks such as electrical leakage, fire, flooding, or humidity, according to the nature of the environment where the special categories of personal data are stored.

The physical security of the environments where special categories of personal data are stored will be ensured, and unauthorized access will be prevented.

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SECTION 6. MEASURES FOR THE TRANSFER OF SPECIAL CATEGORY PERSONAL DATA

6.1 Transfer via Email

If special category personal data needs to be transferred via email, it should be sent using a corporate email address or a Registered Electronic Mail (KEP) account and encrypted.

6.2 Transfer via External Storage Devices

If special categories of personal data need to be transferred via portable media (such as USB, external drives, CDs, DVDs), they must be encrypted using cryptographic methods.

When transferring special categories of personal data via portable media (such as USB, external drives, CDs, DVDs), the cryptographic keys used for encryption must be stored in separate environments.

6.3 Transfer Between Servers

If special category personal data needs to be transferred between servers located in different physical environments, data transfer must be done via VPN or FTP.

6.4 Transfer via Paper Documents

If special categories of personal data need to be transferred in paper form, the necessary precautions must be taken against risks such as theft, loss, or being viewed by unauthorized individuals, and the document must be sent in a “classified documents” format.

SECTION 7. OTHER MATTERS

The responsibility for communicating and distributing the Policy, and any updated version of it, to our company’s employees lies with the KVK Committee.

The necessary software/systems/applications will be implemented by our company to ensure the requirements of the Policy are met, and any changes arising from amendments in the legislation, recommendations announced by the Authority, decisions by the Board, or notifications of rulings from the Board or courts will be monitored by the Data Protection Committee to ensure necessary adjustments are made.