

MNG HOLDING INC. & GROUP OF COMPANIES AND SUBSIDIARIES' POLICY OF PROTECTION AND PROCESSING OF PERSONAL DATA

The protection of personal data is among the most important priorities of MNG HOLDING Incorporation and Group of Companies and subsidiaries.

The most important part of this is the protection and processing of personal data belonging to our employee candidates, company shareholders, company officials, visitors and the employees, shareholders and officials of partner firms as well as third parties – all managed with this Policy.

The activities carried out by our Company regarding the protection of the personal data of our employees are managed in line with the Employee Policy of Protection and Processing of Personal Data Policy that have been written in parallel with the principles of this Policy.

According to the Constitution of the Turkish Republic, everyone has the right to request for the protection of his or her personal data. The protection of personal data is a right guaranteed by the Constitution. Governed by this policy, MNG TARGEM Co. Inc. shows the necessary care and has made it company policy to protect personal data belonging to employee candidates, company shareholders, company officials, visitors and the employees, shareholders and officials of partner firms as well as third parties.

In this context, necessary administrative and technical measures for the protection of personal data processed within the framework of legal legislation are taken by MNG TARGEM Co. Inc.

The fundamental principles adopted by the company regarding the processing of personal data in this Policy are as follows:

- ✓ Lawfulness and conformity with rules of bona fides.
- ✓ Accuracy and being up to date, where necessary.
- ✓ Being processed for specific, explicit and legitimate purposes.
- ✓ Being relevant with, limited to and proportionate to the purposes for which they are processed.
- ✓ Being retained for the period of time stipulated by relevant legislation or the purpose for which they are processed.
- ✓ Informing and enlightening the data subject.
- ✓ Implementing necessary systems so that the data subject can use their rights regarding personal data.
- ✓ Take the necessary measures regarding the storage of personal data.
- ✓ Abide by the relevant legislation and regulations of the board of Protection of Personal Data when transferring data to third parties as required by processing purposes.
- ✓ Demonstrate the necessary sensitivity to the processing and protection of personal data of special nature.

POLICY PURPOSE

The main purpose of the policy is to lawfully process personal data and inform those who have had their personal data processed by our company, including our customers, employees, employee candidates, company shareholders, company officials, visitors, the employees, shareholders and officials of partner firms and third parties, to ensure **transparency and trust**.

SCOPE

This Policy concerns all of the personal data belonging to our employees, employee candidates, company shareholders, company officials, visitors and employees, officials and shareholders of partner firms as well as third parties, processed through automatic means, or provided that the process is a part of any data registry system, through non-automatic means.

The scope of application of this policy concerning the personal data groups in the categories cited above could be the entirety of the policy as well as a part of it.

APPLICATION OF POLICY AND RELATED REGULATIONS

Relevant statutory regulations regarding the processing and protection of personal data will be referred to first and foremost. If discrepancies between the statutory regulations and the Policy arise, our company accepts that the current legislation will be implemented. The Policy has been established by adapting the laws put forth by the current legislation in the scope of company practices.

IMPLEMENTATION OF POLICY

This Policy issued by our company is effective as of the date of the implemented legislation. If there are changes or additions to the policy, the effective date will be updated accordingly.

The Policy is published on our company website and is made available to the access of interested parties upon the request of data subjects.

MATTERS REGARDING THE PROTECTION OF PERSONAL DATA

As per Article 12 of the Law of Protection of Personal Data (PPD Law), our company takes necessary administrative, technical and legal measures to ensure the lawful processing, access and storage of personal data and carries out all necessary inspections in this regard.

ENSURING THE PROTECTION OF PERSONAL DATA

Administrative and Technical Measures Taken to Ensure That Personal Data is Lawfully Processed

To ensure the lawful processing of personal data, our company makes use of technological capabilities and takes technical and administrative measures according to their application costs.

(i) Technical Measures Taken to Ensure Lawful Processing of Personal Data

The primary technical measures taken by our company to ensure the lawful processing of personal data are as follows:

- ✓ The processing activity of personal data conducted in our company is inspected via technical systems.
- ✓ The technical measures that are taken are reported to authorities periodically as part of our internal inspection mechanism.
- ✓ Technically knowledgeable personnel are employed.

(ii) Administrative Measures Taken to Ensure Lawful Processing of Personal Data

The primary administrative measures taken by our company to ensure the lawful processing of personal data are as follows:

- ✓ Employees must be informed and trained according to legislation and the lawful processing of personal data.
- ✓ All of the activities carried out by our company are analyzed in detail for each business unit, with personal data processing operations of each unit's commercial activities revealed as a result.
Personal data processing activities carried out by the business units of our company; actions to be carried out to ensure compliance in accordance with Law No. 6698 are determined per business unit and its activities.
- ✓ In order to ensure that legal requirements are met, our business units create awareness and determine implementation regulations specific to each unit; necessary administrative measures to ensure the regulation of these matters and their continuous implementation are carried out by internal company policies and trainings.
- ✓ Unless instructed by the company or legal exceptions, the agreement and documents that manage the legal relationship between our company and employees include the following clauses: obligation to not process, disclose, and use personal data, with necessary awareness created among employees as well as inspections carried out.

Technical and Administrative Measures Taken to Prevent Unlawful Access to Personal Data

Our company takes technological and administrative measures depending on the data to be protected, technological capabilities and application costs to prevent the unauthorized or reckless disclosure, transfer and unlawful access of personal data.

(i) Technical Measures Taken to Prevent Unlawful Access to Personal Data

The primary technical measures taken by our company to prevent the unlawful access of personal data are as follows:

- ✓ Take the necessary technical measures in line with technological developments and update and renew these measures periodically.
- ✓ Technical solutions for access and authorization are implemented in accordance with business-unit specific legal compliance requirements.

- ✓ Technical measures that are taken are reported to authorities periodically as part of the internal inspection mechanism, matters that pose risks are re-evaluated with necessary technological solutions produced.
- ✓ Software and equipment with virus protection systems and security walls are installed.
- ✓ Technically knowledgeable personnel are employed.

(ii) Administrative Measures Taken to Prevent Unlawful Access to Personal Data

The primary administrative measures taken by our company to prevent the unlawful access of personal data are as follows:

- ✓ Employees must be trained regarding technical precautions.
- ✓ Access and authorization processes within the Company are designed and implemented in accordance with business unit-based legal compliance requirements.
- ✓ Employees are informed that they must comply with the provisions of the PPD Law; they will not be able to disclose personal data that they have learnt to others, and use the data for purposes other than their processing purposes and that this obligation will continue after having left their position at work and necessary.
- ✓ The following clauses are added to the agreements between our company and the persons to whom personal data are lawfully transferred: the persons to whom personal data is transferred shall take the necessary security measures in order to protect personal data and these measures shall be adhered to in their own institutions.

The Storage of Personal Data in Secure Environments

Our company takes the necessary technical and administrative measures depending on their technological capabilities and their application costs to ensure the protection of personal data in secure environments and to prevent their erasure, destruction or alteration for unlawful purposes.

(i) Technical Measures Taken for the Secure Storage of Personal Data

The primary technical measures taken by our company regarding the storage of personal data are as follows:

- ✓ Systems in line with technological developments are used to store personal data in secure environments.
- ✓ Personnel with expertise on technical matters are employed.
- ✓ Technical secure systems regarding data storage is established, technical measures that are taken are reported to officials periodically as part of internal inspection mechanisms, factors that pose risks will be reassessed and required technological solutions will be produced.
- ✓ Legitimate back up programs are used to ensure that personal data is securely stored.

(i) Administrative Measures Taken for the Secure Storage of Personal Data

The primary administrative measures taken by our company regarding the storage of personal data are as follows:

- Employees will be trained regarding the secure storage of personal data.

- In cases where external services are employed for technical purposes regarding the storage of personal data, the agreements with companies whom we cooperate with and lawfully transfer personal data to shall include; measures that ensure that the persons to whom the personal data will be transferred to will take the necessary security precautions and to ensure that these measures will be adhered to in their own institutions for the protection of personal data.

The Inspection of Measures Taken to Protect Personal Data

In accordance with Article 12 of the Personal Data Protection Law, our company carries out internal inspections. These inspection results are reported to relevant departments as part of the company's internal operations and necessary activities are carried out to improve the measures that are taken.

Measures to be taken in Case of Unauthorized Disclosure of Personal Data

In cases where the personal data that has been processed in line with Article 12 of the PPD Law is obtained by other parties through unlawful means, our company will notify the relevant data subjects and the PPD Board as soon as possible.

If deemed necessary by the PPD Board, the situation will be declared on the PPD Board's website or through other channels.

PROTECTING THE RIGHTS OF THE DATA SUBJECT; CREATING CHANNELS FOR THE SUBMISSION OF RIGHTS AND ASSESSING THE REQUESTS OF DATA SUBJECTS

Our company uses and carries out necessary channels, internal operations and administrative and technical regulations in accordance with Article 13 of the PPD law to assess the rights of the data subject and to provide the data subjects with necessary information.

In the event that data subjects submit their written requests to our Company regarding their rights listed below, depending on the nature of the request, our Company will conclude their request free-of-charge, as soon as possible and in a maximum of 30 days. However, if the transaction requires additional costs to be incurred, our Company will charge a fee determined by the PPD Board. Personal Data subjects are entitled to the following rights regarding their personal data:

- ✓ To learn whether his/her personal data is processed or not,
- ✓ To request information if his/her personal data is processed,
- ✓ To learn the purpose of his/her data processing and whether this data is used for intended purposes,
- ✓ To know the third parties to whom his/her personal data is transferred at home or abroad,
- ✓ To request the rectification of the incomplete or inaccurate data, if any, and that these changes be communicated to third parties to whom personal data is transferred,

- ✓ Despite being processed under the provisions of the PPD Law and other related laws, if reasons that require the processing no longer exist, the data subject has the right to request the erasure or destruction of his/her personal data and that this be communicated to third parties to whom personal data is transferred,
- ✓ To object to the processing, exclusively by automatic means, of his/her personal data, which leads to an unfavorable consequence for the data subject,
- ✓ To request compensation for the damage arising from the unlawful processing of his personal data.

Detailed information regarding the rights of data subjects is included in this Policy.

THE PROTECTION OF PERSONAL DATA OF SPECIAL NATURE

Particular emphasis has been given to certain personal data under the Law on the Protection of Personal Data (KVK), which if processed unlawfully could pose a risk of discrimination or victimization.

Personal data relating to the race, ethnic origin, political opinion, philosophical belief, sect or other belief, clothing, membership to associations, foundations or trade unions, health, sexual life, convictions, and security measures, and the biometric and genetic data are deemed to be personal data of special nature.

Our company is sensitive regarding the protection of personal data that is deemed to be of “special nature” under the Law on the Protection of Personal Data (KVK), and that is lawfully processed. In this context, technical and administrative measures that are taken to protect personal data of special nature are executed with utmost care, with necessary inspections carried out within the company.

Detailed information regarding the processing of personal data of special nature is included in this Policy.

INCREASING AWARENESS AND INSPECTIONS AMONG BUSINESS UNITS IN REGARDS TO THE PROTECTION AND PROCESSING OF PERSONAL DATA

Our company carries out relevant training sessions for business units to prevent the unlawful processing and access of personal data and to increase awareness regarding the storage of data.

Necessary systems are set up to create awareness regarding the protection of personal data of existing and new employees of MNG Targem's business units, and we work with external third party professionals in case of need.

INCREASING AWARENESS AND INSPECTIONS REGARDING THE PROTECTION AND PROCESSING OF PERSONAL DATA BELONGING TO BUSINESS PARTNERS AND SUPPLIERS

Our company provides training and seminars for its business partners to prevent the unlawful processing and access of personal data and awareness regarding its storage.

The trainings provided for the company's business partners are repeated periodically, necessary systems are set up to create awareness regarding the protection of personal data of existing and new employees of our business partners and third party professionals are worked with in case of need.

Results of the training sessions that create awareness regarding the protection and processing of personal data of the company's business partners are reported to MNG Targem. In this light, our company carries out the necessary inspections to assess participation to related trainings, seminars and information sessions. Our company updates and renews its trainings parallel with the relevant legislation.

MATTERS REGARDING THE PROCESSING OF PERSONAL DATA

Our Company carries out personal data processing in accordance with Article 20 of the Constitution and Article 4 of the PPD Law; principles adopted when processing are lawfulness and conformity with rules of bona fides, accurate and up to date, where necessary, being processed for specific, explicit and legitimate purposes, being relevant with, limited to and proportionate to the purposes for which they are processed. Our Company retains personal data for the period of time stipulated by relevant legislation or for the necessary time required for the purpose for which they are processed.

In accordance with Article 20 of the Constitution and Article 5 of the PPD Law, our Company processes personal data in line with one or more of the conditions stated in Article 5 of the PPD Law.

In accordance with Article 20 of the Constitution and Article 10 of the PPD Law, our Company enlightens data subjects and informs them if they require additional information.

In line with Article 6 of the PPD Law, our Company complies with provisions regarding the processing of personal data of special nature.

In accordance with Article 8 and 9 of the PPD Law, our Company complies with legal provisions put forth by the PPD Board regarding the transfer of personal data.

THE LAWFUL PROCESSING OF PERSONAL DATA

Lawful Processing and Conformity with Rules of Bona Fides

Our company acts in accordance with the laws and rules of bona fides in processing personal data. In this context, our company takes into account the proportionality requirements in the processing of personal data and does not use the data for other purposes.

Ensuring that Personal Data is Accurate and Up to Date, Where Necessary

Our company ensures that the personal data processed by taking into consideration the fundamental rights and legitimate interests of data subjects are accurate and up to date. The necessary precautions are taken in this regard.

Processed for Specific, Explicit and Legitimate Purposes

Our Company determines the purpose of lawful personal data processing openly and clearly. Our Company is in link with the service that presents personal data and only processes the necessary amount.

Being Relevant with, Limited to and Proportionate to the Purposes for which they are Processed

Our Company processes personal data in a manner that is conducive to their processing purposes and avoids the irrelevant or unnecessary processing of personal data that. For example, personal data processing to meet potential future needs is not carried out.

Being Retained for the Period of Time Stipulated by Relevant Legislation or the Purpose for Which they are Processed

Our Company only retains personal data for the period of time stipulated by relevant legislation or the amount of time required for the purpose for which they are processed. In this context, our Company firstly determines if a certain period of time has been foreseen for the retention of personal data, complied with it if it has, and if not specified, retains the data for the time required for the processing purposes. Personal data is not retained in cases where reasons for processing cease to exist; it is erased, destroyed or made anonymous. Personal data is not stored to meet potential future needs. Detailed information regarding this matter can be found in this Policy.

PERSONAL DATA IS PROCESSED IN LINE WITH ONE OR MORE AND LIMITED TO THE PROCESSING CONDITIONS IN ARTICLE 5 OF THE PPD LAW

Protection of personal data is a constitutional right. Fundamental rights and freedoms may only be restricted by law, in line with the reasons stated in the Constitution and without taking from their essence. In accordance with the third clause of Article 20 of the constitution personal data can only be processed in cases set forth by the law or with the data subject's explicit consent. In light of this and of the Constitution, personal data is only processed in cases set forth by the law or with the explicit consent of the data subject. Detailed information regarding this matter can be found in this Policy.

ENLIGHTENING AND INFORMING THE DATA SUBJECT

As per Article 10 of the PPD Law, our Company enlightens data subjects during the acquisition of personal data. In this light, the data subject is informed regarding MNG Targem and the identity of its representative, with which purpose the personal data is processed, to whom and for what purpose it can be transferred, the method of personal data acquisition and the rights that the data subject is entitled to. Detailed information regarding this matter can be found in this Policy.

Article 20 of the Constitution states that everyone has the right to be informed about their own personal data. In this respect, "requesting information" is included among the rights of the data subject in Article 11 of the PPD Law. In this regard and in line with the Article 20

of the Constitution and Article 11 of the PPD Law, our Company informs the data subject if he/she requests information. Detailed information regarding this matter can be found in this Policy.

THE PROCESSING OF PERSONAL DATA OF SPECIAL NATURE

Our company is compliant to the legislation and sensitive regarding the lawful processing of personal data that is deemed to be of “special nature” under the Law on the Protection of Personal Data (KVK).

Certain personal data under Article 6 of the Law on the Protection of Personal Data (KVK) that could pose a risk of discrimination or victimization if processed unlawfully is deemed to be of “special nature”. Personal data relating to the race, ethnic origin, political opinion, philosophical belief, sect or other belief, clothing, membership to associations, foundations or trade unions, health, sexual life, convictions, and security measures, and the biometric and genetic data are deemed to be personal data of special nature.

Our company acts in accordance with the Law on the Protection of Personal Data and the measures determined by the PPD Board, and processes personal data of special nature only under the conditions below:

- ✓ With the explicit consent of the data subject
- ✓ Without the explicit consent of the data subject;
 - Personal data of special nature excluding that of the data subject’s health and sexual life in the cases provided for by laws,
 - Personal data relating to health, and sexual life may only be processed by any person or authorized public institutions and organizations that have confidentiality obligation, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing.

THE TRANSFER OF PERSONAL DATA

Our company is able to transfer the personal data and the personal data of special nature of the data subject to third parties (third party companies, business partners, and third party natural persons) by taking necessary security measures in accordance with the legally compliant personal data processing purposes. Our company complies with the regulations set out in Article 8 of the Law on the Protection of Personal Data. Detailed information regarding this subject can be found in this Policy.

The Transfer of Personal Data

In accordance with legitimate and legally compliant personal data processing purposes, our company may transfer personal data to third parties based on one or more and limited to the personal data processing conditions stated in Article 5 of the law below:

- ✓ If there is explicit consent of the data subject,
- ✓ If there are clear regulations on the transfer of personal data in the law,

- ✓ If it is mandatory for the protection of life or physical integrity of the data subject or another third party and the data subject is bodily incapable of giving his/her consent or whose consent is not deemed legally valid;
- ✓ Processing and transfer of personal data belonging to the parties of a contract is necessary provided that it is directly related to the conclusion or fulfillment of that contract,
- ✓ If personal data transfer is necessary to fulfill our company's legal obligation,
- ✓ If personal data is publicized by the data subject,
- ✓ If the transfer of personal data is mandatory for the establishment, application or protection of any right,
- ✓ It is mandatory for the legitimate interests of the controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

Transferring Personal Data of Special Nature

By showing the necessary care, taking the necessary security measures as well as the ones put forth by the PPD Board, our Company can transfer the personal data of special nature of data subjects in line with lawful personal data processing purposes to third parties in the cases listed below.

- ✓ With the explicit consent of the data subject or
- ✓ Without the explicit consent of the data subject;
- Personal data of special nature excluding that of the data subject's health and sexual life (data regarding *race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership to associations, foundations or trade-unions, health, sexual life, convictions and security measures, and the biometric and genetic data*) in the cases provided for by laws,
- Personal data relating to health, and sexual life may only be processed by any person or authorized public institutions and organizations that have confidentiality obligation, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing.

TRANSFER OF PERSONAL DATA ABROAD

In line with lawful personal data processing purposes, our Company may transfer the data subject's personal data and personal data of special nature by taking the necessary security precautions. Our Company transfers personal data to countries that are determined to have the necessary security measures by the PPD Board ("**Foreign Country with Sufficient Security**") or in cases where the sufficient security is inexistent, a written agreement is established among the data controllers in Turkey and abroad and transferred to countries that the PPD Board deems appropriate ("**Foreign Country with Data Controller that Guarantees Sufficient Security**"). In this regard, our company acts in line with the

provisions in Article 9 of the PPD Law. Detailed information regarding this matter can be found in this Policy.

Transfer of Personal Data Abroad

In line with lawful personal data processing purposes, our Company can transfer the personal data to **Foreign Countries with Sufficient Security or Foreign Countries with Data Controllers that Guarantees Sufficient Security** if there is explicit consent of the data subject, or if there is not, provided that one of the conditions below exist.

If there is a clear regulation on the transfer of personal data in the law,

- ✓ If it is necessary and directly related to the establishment or execution of a contract and mandatory for the personal data belonging to the parties of the contract to be transferred,
- ✓ If it is mandatory for the protection of life or physical integrity of the data subject or another third party and the data subject is bodily incapable of giving his/her consent or whose consent is not deemed legally valid;
- ✓ If personal data transfer is necessary to fulfill our company's legal obligation,
- ✓ If personal data transfer is publicized by the data subject,
- ✓ If the transfer of personal data is mandatory for the establishment, application or protection of any right,
- ✓ It is mandatory for the legitimate interests of the company, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

The Transfer of Personal Data of Special Nature Abroad

By showing the necessary care, taking the necessary security measures as well as the ones put forth by the PPD Board, our Company can transfer the personal data of special nature of data subjects in line with lawful personal data processing purposes to **Foreign Countries with Sufficient Security or Foreign Countries with Data Controllers that Guarantees Sufficient Security** in the cases listed below.

- ✓ With the explicit consent of the data subject or
- ✓ Without the explicit consent of the data subject;
- Personal data of special nature excluding that of the data subject's health and sexual life (data regarding *race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership to associations, foundations or trade-unions, health, sexual life, convictions and security measures, and the biometric and genetic data*) in the cases provided for by laws,
- Personal data relating to health, and sexual life may only be processed by any person or authorized public institutions and organizations that have confidentiality obligation, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing.

THE CATEGORIZATION, PROCESSING PURPOSES AND STORAGE OF PERSONAL DATA

As part of Article 10, the obligation of controller to inform, of the Law on the Protection of Personal Data, our company is obliged to inform the data subject of which data subject groups' personal data is being processed, the purpose of data processing and its storage time.

THE CATEGORIZATION OF PERSONAL DATA

In accordance with Article 10, the obligation of the controller to inform, of the PPD Law, concerned individuals will be informed, in line with our lawful personal data processing purposes, based on one or more than one and limited to the personal data processing conditions in Article 5 of the of the PPD Law, in addition to the principles regarding the processing of personal data set forth in Article 4 of the PPD Law, our company complies to the general principles and abides by all the regulations of this Policy, limited to the subjects and processes the personal data of the categories stated below. The personal data processed in these categories and their relations to the data subjects in the context of this Policy have been stated in this Policy.

IDENTIFICATION INFORMATION; Clearly belonging to an identified or identifiable natural person, processed with partially or fully automatic means or non-automatic mean as part of a data recording system; all information found in documents such as a Driver's License, Identification Card, Residency Permit, Passport, Lawyer's Identification, Marriage Certificate.

CONTACT INFORMATION; Clearly belonging to an identified or identifiable natural person, processed with partially or fully automatic means or non-automatic mean as part of a data recording system; information such as the telephone number, address and e-mail.

CUSTOMER INFORMATION; Clearly belonging to an identified or identifiable natural person, processed with partially or fully automatic means or non-automatic mean as part of a data recording system; our commercial activities and information obtained and produced on persons concerned by operations led by our business units.

PHYSICAL PREMISES INFORMATION SECURITY; Clearly belonging to an identified or identifiable natural person, and a part of the data recording system, personal data from records and documents taken at entry or inside of the physical premises.

TRANSACTION INFORMATION SECURITY; Clearly belonging to an identified or identifiable natural person, and a part of the data recording system; your personal data that is processed to ensure the security of our technical, administrative, legal and financial security during our business operations.

RISK MANAGEMENT INFORMATION; Clearly belonging to an identified or identifiable natural person, personal data that is processed in accordance with the law so that we can manage our risks in the data recording system.

FINANCIAL INFORMATION; Clearly belonging to an identified or identifiable natural person, processed with partially or fully automatic means or non-automatic mean as part of a data recording system; personal data from information, documents and records that show financial results, created based on the type of legal relationship between our company and the data subject.

PERSONAL INFORMATION; Clearly belonging to an identified or identifiable natural person, processed with partially or fully automatic means or non-automatic mean as part of a data recording system; personal data processed to obtain information that is essential for the creation of the personal rights of our employees or natural persons who are in a business relationship with our company.

EMPLOYEE CANDIDATE INFORMATION; Clearly belonging to an identified or identifiable natural person, processed with partially or fully automatic means or non-automatic mean as part of a data recording system; Processed personal data of persons who have applied to become an employee of our company or who have been assessed as potential employees as part of our company's honest business practices to fulfill human resources needs or persons who are in a business relationship with our Company.

EMPLOYEE PROCESSING INFORMATION; Clearly belonging to an identified or identifiable natural person, processed with partially or fully automatic means or non-automatic mean as part of a data recording system; processed personal data regarding business transactions made by our employees or natural persons who have business ties with our company.

INFORMATION REGARDING WORK PERFORMANCE AND CAREER DEVELOPMENT; Clearly belonging to an identified or identifiable natural person, processed with partially or fully automatic means or non-automatic mean as part of a data recording system; processed personal data regarding performance and career development carried out as part of our company's human resources policies, belonging to our employees or natural persons who have business ties with our company.

INFORMATION REGARDING COMPLEMENTARY RIGHTS AND BENEFITS; Clearly belonging to an identified or identifiable natural person, processed with partially or fully automatic means or non-automatic mean as part of a data recording system; The planning of complementary rights and benefits that our Company provides and will provide for its employees or natural persons who have business ties with our company, determining objective criterion as to the entitlement of rights, and your personal data that is processed for the follow-up of these entitlements.

LEGAL PROCESSING AND COMPLIANCE INFORMATION; Clearly belonging to an identified or identifiable natural person, processed with partially or fully automatic means or non-automatic mean as part of a data recording system; your personal data processed as part of our legal claims, the determination and follow up of our rights, the execution of our debts and our legal obligations and in the scope of complying with company policies.

INSPECTION AND COMPLIANCE INFORMATION; Clearly belonging to an identified or identifiable natural person, processed with partially or fully automatic means or non-automatic mean as part of a data recording system; Your personal data processed as part of our company's legal obligations and compliance with company policies.

PERSONAL DATA OF SPECIAL NATURE; Clearly belonging to an identified or identifiable natural person, processed with partially or fully automatic means or non-automatic mean as part of a data recording system; the data specified in Article 6 of Law No. 6698.

INFORMATION REGARDING MANAGEMENT OF REQUESTS/COMPLAINTS; Clearly belonging to an identified or identifiable natural person, processed with partially or fully automatic means or non-automatic mean as part of a data recording system; The personal data processed and evaluated as part of requests and complaints made to our Company.

THE PURPOSE OF PROCESSING PERSONAL DATA

According to the categorization prepared by our Company, the main objectives for processing personal data are listed below:

- ✓ To carry out the necessary activities by our business units and related business processes so that commercial activities that are completed by our Company can be realized,
- ✓ Planning and conducting commercial and/or business strategies of our Company,
- ✓ Completing the necessary works that are to be realized by our business units to ensure that the goods and services that are provided by our company benefit the relevant people and the management of related processes,
- ✓ The planning and execution of our company's human resources policies and processes,
- ✓ The legal, technical and commercial business guarantee of persons who have business ties with our Company

Data processing purposes within the scope of the purposes listed above are as follows:

- ✓ Event Management
- ✓ Planning and Execution of Research and Development Activities
- ✓ Planning and Execution of Business Activities
- ✓ Planning and Execution of Corporate Communication Activities
- ✓ Planning and Execution of Data Security Processes
- ✓ Establishing and Managing an Information Technology Infrastructure
- ✓ The Planning and Execution of Access Authority to Data and Facilities for Business Partners and/or Suppliers
- ✓ The Planning and Execution of Complementary Rights and Benefits for Supplier and/or Business Partners' Employees
- ✓ Follow up of Finance and Accounting Activities
- ✓ Planning and Execution of Logistics Operations
- ✓ Relationship Management with Business Partners and/or Suppliers
- ✓ Performing Actions to Determine Customers' Financial Risks
- ✓ Planning and Execution of Customer Relationship Management Processes
- ✓ Follow up of Contractual Processes and/or Legal Requests
- ✓ Follow up of Customer Requests and/or Complaints

- ✓ Planning of Human Resources Processes
- ✓ Execution of the Personnel Procurement Process
- ✓ The Follow-up of Legal Affairs
- ✓ The Planning and Execution of Necessary Company Activities Required for the Procurement of Company Activities with Company Procedures and/or Related Legislation
- ✓ Collecting the Check In and Check Out Records of Business Partners and Suppliers'' Employees
- ✓ Establishing and Following Up with Visitor Records
- ✓ The Planning and Execution of Company Inspection Activities
- ✓ The Planning and Execution of Occupational Health and/or Safety Processes
- ✓ Providing Accurate and Up-to-date Data
- ✓ Management and/or Inspection of the Relationship with Affiliates
- ✓ Security Guarantee of Company Premises and/or Facilities
- ✓ Security Guarantee of Company Assets and/or Resources
- ✓ The Planning and Execution of the Company's Financial Risk Processes

Our Company calls upon the explicit consent of the data subjects in order to be able to conduct personal data processing in the context of personal data processing purposes other than those mentioned above; the following personal data processing activities are carried out by respective business units in line with the explicit consent of data subjects. In this context, if the conditions above are not met, the personal data processing purposes that call upon the explicit consent of data subjects are:

- ✓ The Planning and Execution of Business Partners' and/or Suppliers' Authorization to Access Information and Facilities
- ✓ The Planning and Execution of Logistics Activities
- ✓ Relationship Management with Business Partners and/or Suppliers
- ✓ Follow up of Contractual Processes and/or Legal Requests
- ✓ The Planning of Human Resources Processes
- ✓ Execution of the Personnel Procurement Process
- ✓ The Planning and/or Execution of Customer Satisfaction Activities
- ✓ The Planning and Execution of Necessary Company Activities Required for the Procurement of Company Activities with Company Procedures and/or Related Legislation
- ✓ Collecting the Check In and Check Out Records of Business Partners and Suppliers'' Employees
- ✓ The Planning and Execution of Company Inspection Activities
- ✓ The Planning and Execution of Occupational Health and/or Safety Processes
- ✓ Security Guarantee of Company Premises and/or Facilities

THE RETENTION PERIOD OF PERSONAL DATA

Our Company retains personal data for the period of time stipulated by relevant legislation. If the time period is not specified in the relevant legislation, as per Company and commercial life practices, personal data is retained for the time required for the processing purposes, in line with the services it provides as a result of the processing, and is later

erased, destroyed or made anonymous. Detailed information regarding this matter can be found in this Policy.

If the reasons for processing no longer exist and the period of retention determined by relevant legislation and the Company have come to an end; personal data may only be kept as evidence for possible legal disputes, for the purpose of claiming relevant rights related to personal data or to establish a hearing. The retention periods are determined based on the requests of the same sort that have already been filed with our company. In this case, the stored personal data shall not be accessed for any other purpose other than to be used in relevant legal disputes. Here again, personal data is deleted, destroyed or made anonymous after the relevant retention time has come to an end.

CATEGORIZATION OF DATA SUBJECTS OF PERSONAL DATA PROCESSED BY OUR COMPANY

The personal data of the data subject categories below are processed by our company with the scope of application of this Policy limited to our customers, potential customers, employee candidates, company shareholders, company officials, visitors, the employees of institutions with which we collaborate, their shareholders, officials and third parties.

The activities of protection and processing of personal data conducted by our employees will be evaluated under the MNG TARGEM Co. Inc. Employees Protection and Processing of Personal Data Policy. The categories of persons who's personal data is processed in the scope stated above by our company, and those who remain outside of these categories can file their requests regarding the PPD Law to our Company. The requests of these persons will be assessed in the scope of this policy.

The concepts of customer, potential customer, visitor, employee candidate, shareholder and board member, natural persons from institutions with whom we collaborate and third parties related to these persons that are found in this Policy are clarified below.

CATEGORIES AND THEIR DEFINITIONS

Visitor; Those who have entered the physical or digital premises (websites) of our companies for various purposes.

Third Party; Related third party natural persons or natural persons who do not fall within the scope of this policy or the company employees protection of personal data policy who ensure the transaction security between our company and parties, protect the rights of the relevant persons and reap the benefits.

Employee Candidate; Those who have applied to our company for a job through various channels, or that have revealed their data to our company by sending their C.V.

Company Shareholder; Natural people who are the shareholders of our company.

Company Official; Natural officials, and other members of the board at the company.

Employees, institutions, shareholders and officials with whom we are in collaboration; Natural persons from institutions with whom our company is in cooperation (Such as but not limited to business partners, offices, suppliers and the shareholders and officials of these institutions).

THIRD PARTIES TO WHOM PERSONAL DATA IS TRANSFERRED BY OUR COMPANY AND THEIR TRANSFERRING PURPOSES

In accordance with Article 10 of the PPD Law, our Company informs the data subject of the person categories to whom the personal data is transferred.

In accordance with Article 8 and 9 of the PPD Law, our Company can transfer personal data of those who have received services to the person categories below:

- (1) Company Business Partners,
- (2) Company Suppliers,
- (3) Company Affiliates,
- (4) Company Shareholders,
- (5) Legally Authorized Public Institutions and Organizations
- (6) Legally Authorized Private Legal Persons

The scope of persons above that data is transferred to and the data transferring purposes are limited to as follows:

- To ensure that the purposes for which the business partnership is established are fulfilled,
- In order to provide our Company with the necessary services that are obtained from outsourced suppliers and to carry out business activities
- Guarantee the execution of commercial activities that require that participation of Company affiliates,
- Designing and supervising so that strategies and inspection activities regarding our Company's commercial activities are in line with provisions of legal legislation
- Sharing data within our legal authority in the event that legally authorized private legal persons request information and documents from our company within the framework of legislation,
- Sharing data within our legal authority in the event that legally authorized public institutions and organizations request information and documents from our company within the framework of legislation,

Transfers carried out by our Company remain compliant to the points set forth in the policy.

Our company enlightens data subjects regarding their processed personal data in accordance with Article 10 of the PPD Law.

Although the legal basis for the processing of personal data by our Company varies, all personal data processing activities are carried out in accordance with the general principles set forth in Article 4 of Law No. 6698.

The explicit consent of visitors and third parties must be obtained so that personal data can be processed in line with the data subject's consent.

The personal data of the data subject may be lawfully processed if explicitly stipulated in law.

The data subjects personal data can be processed in cases where it is mandatory for the protection of life or physical integrity of the data subject or another third party and the data subject is bodily incapable of giving his/her consent or whose consent is not deemed legally valid.

Personal data may be processed if it is directly related to the establishment or execution of a contract and if it is necessary for the personal data belonging to the parties of a contract to be processed.

The data subject's personal data may be processed if it is compulsory for our Company to fulfill its legal obligations as data controller.

Personal data of the data subject may be processed if the data subject has made the relevant personal data public.

Personal data of the data subject may be processed if it is mandatory for the establishment, use or protection of a right. (Ex. invoice)

Provided that this processing shall not violate the fundamental rights and freedoms of the data subject, if the data processing is compulsory for our company's legitimate interests, the personal data of the owner may be processed. (such as to make internal calculations etc.).

Personal data processing activities completed by our Company at the entrance of or inside the premises of our facilities are carried out in accordance with the Constitution, PPD Law and other related legislation.

For the purpose of ensuring security, our company carries out personal data processing activities in our company's buildings and facilities through monitoring visitor entries and exits with security cameras.

Our Company carries out personal data processing activities by using security cameras and recording visitors' entry and exits.

In this context, our Company acts in accordance with the Constitution, the PPD Law, and other related legislation. Within the scope of monitoring with security cameras, our company aims to increase the quality of the provided service, ensure its reliability, ensure the protection of our Company, employees and other parties and protect third parties' interests regarding the service they received. The security camera monitoring activities carried out by our Company is executed in accordance with the Law on Private Security Services and relevant legislation. Our Company acts in line with the provisions in the PPD Law when monitoring with cameras for purposes of security.

In order to ensure the security of our company buildings and facilities, our company carries out monitoring activities via security cameras for purposes stipulated in the law, and as stated by the personal data processing provisions in the PPD Law.

The public announcement regarding monitoring is made in line with Article 10 of the PPD Law.

In addition to clarifying general points, our company uses multiple ways to notify regarding security camera monitoring activities, in accordance with EU legislative ordinances. Thus, it

is aimed to prevent harm to the fundamental rights and freedoms of the data subject and to reach transparency and enlightening of the data subject.

In accordance with Article 4 of the PPD Law, our Company processes personal data in a way that is relevant with, limited to and proportionate to the purposes for which they are processed.

The purposes of monitoring via security cameras are limited to the purposes stated in this Policy. In this respect, the monitoring areas, number of security cameras and when to monitor them are taken into effect for and are limited to the purpose of achieving a secure environment. Areas that interfere with the person's privacy such as toilets, are not monitored.

Technical and administrative measures are taken by our Company to ensure the security of personal data obtained as a result of the camera surveillance pursuant to Article 12 of the PPD Law.

Recordings that are recorded and maintained in digital environments are only accessible to a limited number of company employees. Live camera recordings can only be viewed by external security services. A limited number of persons with access to the records declare that they will protect the confidentiality of the data they obtain with the confidentiality commitment.

Our Company carries out personal data processing in the form monitoring visitor entries and exits from company buildings and facilities in order to ensure security and for the purposes set forth in this Policy.

When the names and surnames of the persons who come to the company buildings as guests are acquired, guests are enlightened or notified regarding the processing of personal data.

The data obtained for guest entry-exit tracking is processed for this purpose only and the related personal data are recorded in the data recording system, in a physical environment.

Regarding the camera surveillance activities carried out by our company; our company publishes this Policy on its website (*online policy regulation*) and hangs a notice in the entrances of areas where monitoring will take place (*on-site enlightening*).

Our company records activity on websites that it owns through technical means to ensure that visitors to these sites conduct their site visits in an appropriate manner for purposes of visiting and that personalized content can be viewed by the site visitor.

Detailed information regarding the protection and processing of personal data of activities that are carried out can be found in the relevant website's "MNG Targem Website Privacy Policy" texts.

Although our company processes in accordance with the provisions of the law set out in

Article 138 of the Turkish Criminal Code and Article 7 of the PPD Law, personal data will be deleted, destructed or made anonymous on our company's own decision or upon request of the data subject, if the reasons for processing no longer exist.

THE ERASURE, DESTRUCTION AND ANONYMIZING TECHNIQUES OF PERSONAL DATA

The Erasure and Destruction of Personal Data

Despite being processed under the provisions of this law, our Company may erase, destruct and anonymize personal data ex officio or upon demand by the data subject if the reasons for processing no longer exist. The erasing and destruction techniques that are used most frequently by our company are listed below:

(i) Physical Destruction

Personal data can also be processed in non-automated ways, as long as it is a part of any data recording system. When such data is erased/destroyed, a system of physical destruction is applied so that the personal data cannot be used again later.

(ii) Secure Deletion from Software

When data that is processed in completely or partially automated ways and stored in digital environments is erased/destroyed, methods of erasing the data from the related software is used so that it can no longer be recovered.

(iii) Sending to a Specialist for Secure Deletion

In some cases, our company may form an agreement with an expert to erase personal data on behalf of itself. In this case, the personal data is erased/destroyed securely in such a way that the expert cannot recover it again.

Anonymizing Techniques of Personal Data

Anonymization of personal data means rendering personal data unidentifiable so that it cannot be linked to a specific or identifiable natural person under any circumstance, even if personal data is matched with other data. Our company can anonymize personal data when the reasons for lawfully processing personal data no longer exist. In accordance with Article 28 of the PPD Law, anonymized personal data may be processed for purposes such as research, planning and statistics. As such transactions fall outside the scope of the PPD Law, explicit consent of the data subject will not be sought. As the personal data processed by being made anonymous falls outside the scope of the PPD Law, the rights of this Policy will not apply to this data.

The anonymization techniques most frequently used by our Company are as follows;

✓ **Masking**

Data masking is the method of rendering the personal data anonymous by extracting the basic determinant information of the personal data from the data set.

✓ **Aggregation**

Different data of all sorts are aggregated through data aggregation and personal data are made incapable of being associated with anyone.

✓ **Data Derivation**

The data derivation method creates a more general content from the contents of the personal data and makes it impossible for it to be associated with any specific person

✓ **Data Shuffling, Permutation**

The data shuffling method mixes the data in the personal data sets to destroy the link between the data and its subjects.

As per Article 10 of the PPD Law, our Company enlightens data subjects regarding their rights, and provides guidance on how to use these rights. Our company uses and carries out necessary channels, internal operations and administrative and technical regulations in accordance with Article 13 of the PPD law to assess the rights of the data subject and to provide the data subjects with necessary information.

THE RIGHTS THAT DATA SUBJECTS ARE ENTITLED TO AND HOW THEY CAN USE THESE RIGHTS

Rights of Data Subjects

Data subjects are entitled to the rights below:

- (1) To learn whether his/her personal data is processed or not,
- (2) To request information if his/her personal data has been processed,
- (3) To learn the purpose of his/her data processing and whether this data is used for intended purposes,
- (4) To know the third parties to whom his/her personal data is transferred at home or abroad,
- (5) To request the rectification of the incomplete or inaccurate data, if any, and that these changes be communicated to third parties to whom personal data is transferred,
- (6) Despite being processed under the provisions of the PPD Law and other related laws, if reasons that require the processing no longer exist, the data subject has the right to request the erasure or destruction of his/her personal data and that this be communicated to third parties to whom personal data is transferred,
- (7) To object to the processing, exclusively by automatic means, of his/her personal data, which leads to an unfavorable consequence for the data subject,
- (8) To request compensation for the damage arising from the unlawful processing of his/her personal data.

Cases Where Data Subjects Cannot Claim Their Rights (16)

As per Article 28 of the PPD Law, data subjects cannot claim their rights to the following rights listed below as these cases are held outside of the scope of the PPD Law:

- (1) Personal data is processed for the purpose of official statistics and for research, planning and statistical purposes after having been anonymized.
- (2) Personal data is processed with artistic, historical, literary or scientific purposes, or within the scope of freedom of expression provided that national defense, national security, public security, public order, economic security, right to privacy or personal rights are not violated or they are processed so as not to constitute a crime.
- (3) Personal data is processed within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations duly authorized and assigned to maintain national defense, national security, public security, public order or economic security.
- (4) Personal data is processed by judicial authorities or execution authorities with regard to investigation, prosecution, criminal proceedings or execution proceedings.

In accordance with Article 28/2 of the PPD Law; data subjects cannot claim their rights (except the right to claim compensation) in the cases listed below:

- 1) Data processing is required for the prevention of a crime or crime investigation.
- 2) Data processing of personal data that has been made public by the data subject himself.
- 3) Data processing that is required for inspection or regulatory duties and disciplinary investigation and prosecution to be carried out by the public institutions and organizations and by professional associations having the status of public institution, assigned and authorized for such actions, in accordance with the power conferred on them by the law,
- 4) Processing of personal data by judicial authorities or execution officials in relation to investigations, prosecutions, proceedings or executions.

How Can the Data Subject Use His/Her Rights?

Data subjects can make requests regarding their rights, listed above this section, via one of the free-of-charge methods listed below:

1. Make a personal appeal to our Gayrettepe Mah. Prof. Dr. Bülent Tarcan Cad. Selvi Sok. No:1 Otim Binası B Blok 34349 Fulya-Beşiktaş/İstanbul address after filling out and adding your original signature to the form found at info@mngtargem.com
2. Fill out and add your original signature to the form found in info@mngtargem.com and deliver via notary to our Gayrettepe Mah. Prof. Dr. Bülent Tarcan Cad. Selvi Sok. No:1 Otim Binası B Blok 34349 Fulya-Beşiktaş/İstanbul address
3. Fill out and add your “secure e-mail signature” in accordance with the No. 5070 Electronic E-mail Law to the form found in info@mngtargem.com and send to the same address in an e-mail

It is not possible for third parties to make an appeal on behalf of the data subject.

If a person other than the data subject is to file a request, a relevant special power of attorney must be issued in the name of the person, by the data subject. To be able to use their rights, data subjects must fill out and submit the application form "Application Form for Applications to be made by the Data Subject to the Data Controller under Law No. 6698, Protection of Personal Data". A link to the form is provided above. The details regarding the method of application can be found in the form.

Right of the Data Subject to Complain to the PPD Board

In accordance with Article 14 of the PPD Law, if the application is declined, the response is found unsatisfactory or the response is not given in due time, the data subject may file a complaint with the Board within thirty days of finding out our Company's response, or within sixty days as of the application date.

HOW OUR COMPANY RESPONDS TO REQUESTS

Our Company's Procedures and Deadlines Regarding Responses to Requests

In the event that data subject of the personal data submits to the Company in accordance with the procedure set forth in the above section of this section, the Company shall conclude the request as soon as possible and within thirty days at the latest in accordance with the nature of the claim.

In the event that the data subject submits his/her request to our Company, in accordance with the procedures set forth in the top part of this section, based on the context of the claim our Company will respond to the relevant claim free-of-charge as soon as possible and within thirty days.

However, if the transaction also requires a cost, our company will charge a fee to the applicant as specified by PPD Board.

Our Company's Right to Refusal of the Data Subject's Request

Information That our Company May Request From the Data Subject

Our company may request information from the person concerned in order to determine if the applicant is the data subject or not.

Our company may address questions to the data subject relating to the his/her application and to clarify matters.

Our Company's Right to Refusal Regarding the Data Subject's Application

Our company may refuse the application of the applicant by explaining the reason of refusal in the following cases:

- (2) Personal data is processed for the purpose of official statistics and for research, planning and statistical purposes after having been anonymized.
- (2) Personal data is processed with artistic, historical, literary or scientific purposes, or within the scope of freedom of expression provided that national defense, national security, public security, public order, economic security, right to

privacy or personal rights are not violated or they are processed so as not to constitute a crime.

- (3) Personal data is processed within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations duly authorized and assigned to maintain national defense, national security, public security, public order or economic security.
- (5) Personal data is processed by judicial authorities or execution authorities with regard to investigation, prosecution, criminal proceedings or execution proceedings.
- (6) Data processing is required for the prevention of a crime or crime investigation.
- (7) Data processing of personal data that has been made public by the data subject.
- (8) Data processing that is required for inspection or regulatory duties and disciplinary investigation and prosecution to be carried out by the public institutions and organizations and by professional associations having the status of public institution, assigned and authorized for such actions, in accordance with the power conferred on them by the law,
- (9) Personal data is processed by judicial authorities or execution authorities with regard to investigation, prosecution, criminal proceedings or execution proceedings.
- (10) Personal data processing required for protection of State's economic and financial interests with regard to budgetary, tax-related and financial issues.
- (11) The possibility that the claim made by the data subject may hinder the rights and freedoms of others
- (12) Claims which require disproportionate effort
- (13) That the requested information is public

THE PROTECTION AND PROCESSING OF PERSONAL DATA POLICY'S RELATIONSHIP WITH OTHER POLICIES

The basic policies that have been taken into account for the protection and processing of personal data are specified in relation to the principles laid down by this Policy. These policies are also linked to the basic policies that the Company conducts in other fields, and harmonization is reached between the processes that the Company carries out regarding different policies for similar purposes.

In line with the decision of the Company's top management, a Board for the "Protection of Personal Data" has been established to manage this policy and other related policies related to this policy. The tasks of this Board are stated below.

- To prepare and submit to the top management the basic policies on the Protection and Processing of Personal Data and to put it into effect.
- To implement policies on the Protection and Processing of Personal Data, determine how to carry out their inspections, delegate personnel, provide internal coordination within this framework and present to the top management's approval.
- Identify the necessary things to be done in order to ensure compliance with the Law on the Protection of Personal Data and related legislation and present to the top management's approval; monitor and coordinate their implementation.

- Raise awareness amongst the company and its business partners and affiliates regarding the Protection and Processing of Personal Data.
 - Identify the risks that may arise and in the personal data processing activities of the Company and ensure that necessary preventative measures are taken; propose improvement recommendations to the approval of top management.
 - Design and conduct trainings on the protection of personal data and the implementation of its policies.
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- To settle data subjects' requests with the highest ranks.
 - Coordinating the execution of informative and training activities to ensure that data subjects are informed about personal data processing activities and legal rights.
 - Prepare and submit changes to the main policy on the Protection and Processing of Personal Data and present to the approval of top management.
 - Follow the developments and regulations on the Protection of Personal Data; make recommendations to top management regarding actions that need to be taken within the Company in light of these developments and regulations.
 - Coordinating the relationship with the Protection of Personal Data Board and Institution.
 - Executing other duties that the Company's senior management will provide to protect personal data.

Some of the stated policies are intended for internal Company use. By reflecting internal company policies to those reflected in relevant policies that are open to the public, it is aimed to inform those who are concerned and provide transparency and accountability regarding the personal data processing activities of the Company