HAYHAY ELEKTRONİK PARA VE ÖDEME HİZMETLERİ A.Ş.

PERSONAL DATA STORAGE, PROCESSING AND DISPOSAL POLICY

This Policy may not be copied, reproduced, or used without the express permission of Hayhay Elektronik Para ve Ödeme Hizmetleri A.Ş

CONTENTS

1. CHAPTER-INTRODUCTION…….. 3

1.1. INTRODUCTION…….. 3

1.2. PURPOSE…….. 4

1.3. SCOPE…… 4

1.4. IMPLEMENTATION OF POLICY AND LEGISLATION…… 4

1.5. ENFORCEMENT OF THE POLICY …… 4

2. CHAPTER-MATTERS RELATED TO THE PROTECTION OF PERSONAL DATA….. 5

2.1. ENSURING THE SECURITY OF PERSONAL DATA……. 5

2.2. OBSERVANCE OF DATA SUBJECT RIGHTS; ESTABLISHMENT OF CHANNELS FOR COMMUNICATING THESE RIGHTS TO OUR COMPANY AND EVALUATION OF DATA SUBJECT REQUESTS …… 6

2.3. PROTECTION OF SENSITIVE PERSONAL DATA……. 6

2.4. INFORMING AND NOTIFYING THE DATA SUBJECT…… 7

3. CHAPTER-MATTERS RELATED TO THE PROCESSING OF PERSONAL DATA…… 7

3.1. PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH THE PRINCIPLES SET OUT IN THE LEGISLATION……8

3.2. PROCESSING OF PERSONAL DATA BASED ON ONE OR MORE OF THE CONDITIONS FOR PROCESSING PERSONAL DATA SPECIFIED IN ARTICLE 5 OF THE KVK LAW AND LIMITED TO THESE CONDITIONS…….. 9

3.3. Processing of Special Category Personal Data…….. 9

3.4. Transfer of Personal Data…… 10

3.5. BUILDING AND FACILITY ENTRANCES, PERSONAL DATA PROCESSING ACTIVITIES WITHIN BUILDINGS AND FACILITIES, AND WEBSITE VISITORS……..10

4. SECTION- DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA……12

4.1. DELETION OF PERSONAL DATA……12

4.2. DESTRUCTION OF PERSONAL DATA……12

4.3. ANONYMIZATION OF PERSONAL DATA……12

5. SECTION- OTHER MATTERS……..13

5.1. RELATIONSHIP BETWEEN OUR COMPANY'S PERSONAL DATA PROTECTION AND PROCESSING POLICY AND OTHER POLICIES……..13

5.2. TITLES, DEPARTMENTS AND JOB DESCRIPTIONS OF THOSE INVOLVED IN THE STORAGE AND DISPOSAL PROCESSES OF PERSONAL DATA……..13

5.3. DUTIES OF THE PERSONAL DATA PROTECTION COMMITTEE ……13

Appendix-1 DEFINITIONS AND ABBREVIATIONS……15

Appendix-2 TABLE SHOWING RETENTION AND DISPOSAL PERIODS……16

SECTION 1: INTRODUCTION

1.1. INTRODUCTION

Personal data is defined in Article 3(d) of the Personal Data Protection Law (LPPD/KVKK) under the heading "Definitions" as "any information relating to an identified or identifiable natural person". Personal data consists of three main elements: an identified or identifiable natural person, information, and the attribution of that information to the natural person.

The expression "any information" used in the Law encompasses a natural person's name, surname, identity number, date of birth, place of birth, e-mail address, telephone number, address, occupation, social security number, passport number, motor vehicle license plate, facial image, photograph, voice recording, and any information regarding criminal convictions; in short, any information relating to a natural person is considered personal data. The concept of "information" includes all forms of a person's data in numerical, graphical, photographic, or auditory formats.

The protection of such personal data is among the highest priorities of our Company. The most critical pillar of this matter is the protection, processing, and destruction of personal data belonging to our customers, potential customers, employee candidates, Company shareholders, Company officials, visitors, employees, shareholders, and officials of collaborating companies/institutions, and third parties, all of which are managed under this Policy.

Activities carried out by our Company regarding the protection of our employees' personal data are regulated and managed under the "Hayhay Elektronik Para ve Ödeme Hizmetleri A.Ş. Employee Personal Data Protection, Processing, and Destruction Policy," which is drafted in parallel with the principles in this Policy.

According to the Constitution of the Republic of Turkey, everyone has the right to request the protection of their personal data. Regarding the protection of personal data, which is a Constitutional right, our Company demonstrates the necessary diligence and establishes this as a corporate policy. In this context, all necessary administrative and technical measures for the protection, processing, and destruction of personal data are taken by our Company within the scope of the legislation.

This Policy provides detailed explanations regarding the fundamental principles adopted by our Company in the processing of personal data, as listed below:

- Processing personal data in accordance with the law and the principle of honesty.
- Keeping personal data accurate and, where necessary, up to date.
- Processing personal data for specific, explicit, and legitimate purposes.
- Processing personal data in a manner that is relevant, limited, and proportionate to the purposes for which they are processed.
- Retaining personal data for the period stipulated in the relevant legislation or required for the purpose for which they are processed.
- Informing and enlightening personal data subjects.
- Establishing the necessary system for personal data subjects to exercise their rights.
- Taking necessary measures for the preservation of personal data.

- Acting in accordance with the relevant legislation and the regulations of the Personal Data Protection Board when transferring personal data to third parties in line with the requirements of the processing purpose.

- Demonstrating the necessary sensitivity regarding the processing and protection of special categories of personal data.

1.2. PURPOSE

The primary purpose of this Policy is to provide explanations regarding the personal data processing activities carried out lawfully by our Company and the systems adopted for the protection of personal data. In this context, it aims to ensure transparency by informing individuals whose personal data are processed by our Company, particularly our customers, potential customers, employee candidates, company shareholders, company officials, visitors, and employees/officials of collaborating institutions and third parties.

1.3. SCOPE

This Policy covers all personal data processed through automated means or provided that they are part of any data filing system, through non-automated means, belonging to the persons mentioned in the purpose section.

1.4. APPLICATION OF THE POLICY AND LEGISLATION

The legislation in force regarding the processing and protection of personal data shall primarily apply to our Company. In case of inconsistency between the legislation in force and the Policy, our Company shall continue to apply the legislation in force. This Policy has been created by concretizing and regulating the rules set forth by the relevant legislation within the scope of our Company's practices. Our Company carries out the necessary systems and preparations by acting in accordance with the enforcement periods provided in the KVKK.

1.5. EFFECTIVENESS OF THE POLICY

The effective date of this Policy issued by our Company is 01.06.2025. In the event that the entire Policy or specific articles are renewed, the version of the Policy will be updated. The Policy will be published on our Company's website (www.olatl.com) and will be made available to personal data subjects upon their request.

SECTION 2 – MATTERS RELATING TO THE PROTECTION OF PERSONAL DATA

In accordance with Article 12 of the LPPD (Law on the Protection of Personal Data), our Company prevents the unlawful processing of personal data and unlawful access to such data; it implements necessary technical and administrative measures to ensure the appropriate level of security for the preservation of data and conducts and/or commissions necessary audits in this context.

2.1. ENSURING THE SECURITY OF PERSONAL DATA

Our Company takes the necessary legal, technical, and administrative measures regarding data security and demonstrates the highest level of care and attention in the following matters. The actions and measures taken by our Company to ensure "data security" pursuant to Article 12 of the LPPD are specified below:

- Our Company takes technical and administrative measures based on technological possibilities and implementation costs to ensure the lawful processing of personal data.

- Employees are informed that they may not disclose the personal data they have learned to others in violation of the provisions of the LPPD nor use it for purposes other

than processing; they are further informed that this obligation shall continue after their departure from office, and necessary undertakings are obtained from them accordingly.

- Our Company takes technical and administrative measures according to the nature of the data to be protected, technological possibilities, and implementation costs to prevent accidental or unauthorized disclosure, access, transfer, or any other form of unlawful access to personal data.

- Our Company increases awareness among data-processing institutions, such as business partners and suppliers, to whom personal data has been transferred, regarding the prevention of unlawful processing of personal data, the prevention of unlawful access to data, and ensuring the lawful preservation of data.

- The obligations that our Company must comply with as a data controller while processing personal data, as well as the necessity to adhere to the legal, administrative, and technical measures developed in this regard, are contractually imposed on data-processing institutions with which our Company has relationships—such as suppliers or business partners—in a manner consistent with the nature of the data processing activity they perform.

- Our Company takes necessary technical and administrative measures according to technological possibilities and implementation costs to store personal data in secure environments and to prevent its destruction, loss, or alteration for unlawful purposes.

- In accordance with Article 12 of the LPPD, our Company conducts or commissions necessary audits within its own organization.

- The results of these audits are reported to the relevant department within the internal operations of the Company, and necessary activities are carried out to improve the measures taken.

- In accordance with Article 12 of the LPPD, our Company operates a system to ensure that if processed personal data is obtained by others through unlawful means, this situation is reported to the relevant personal data subject and the Personal Data Protection Board as soon as possible.

2.2. OBSERVANCE OF DATA SUBJECT RIGHTS;

ESTABLISHING CHANNELS FOR SUBMITTING REQUESTS TO OUR COMPANY AND EVALUATION OF DATA SUBJECT REQUESTS

Our Company carries out the necessary channels, internal operations, and administrative and technical arrangements in accordance with Article 13 of the LPPD to evaluate the rights of personal data subjects and to provide the required information to said subjects.

If personal data subjects submit their requests regarding the rights listed below to our Company "in writing" or by other methods determined by the Personal Data Protection Board, our Company shall finalize the request free of charge as soon as possible and within 30 (thirty) days at the latest, depending on the nature of the request. However, if the transaction requires an additional cost, the fee in the tariff determined by the Personal Data Protection Board shall be charged by our Company. Personal data subjects have the right to:

- Learn whether personal data is being processed,

- Request information if personal data has been processed,

- Learn the purpose of the processing of personal data and whether they are used in accordance with their purpose,

- Know the third parties to whom personal data are transferred domestically or abroad,
- Request rectification of personal data if it is processed incompletely or inaccurately and request notification of the transaction performed within this scope to third parties to whom the personal data has been transferred,
- Request the erasure or destruction of personal data in the event that the reasons requiring its processing cease to exist, despite being processed in accordance with the provisions of the LPPD and other relevant laws, and request notification of the transaction performed within this scope to third parties to whom the personal data has been transferred,
- Object to the occurrence of a result against the person themselves by analyzing the processed data exclusively through automated systems,
- Request compensation for damages in the event of sustaining a loss due to the unlawful processing of personal data.

2.3. PROTECTION OF SPECIAL CATEGORIES OF PERSONAL DATA

Under the LPPD, special importance is attributed to certain personal data due to the risk of causing victimization or discrimination when processed unlawfully. These data include race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership in associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data.

Our Company acts with sensitivity in the protection of special categories of personal data determined as "special" by the LPPD and processed in accordance with the law. In this context, the technical and administrative measures taken by our Company for the protection of personal data are diligently applied to special categories of personal data, and necessary audits are ensured.

2.4. ENLIGHTENING AND INFORMING THE PERSONAL DATA SUBJECT

In accordance with Article 10 of the LPPD, our Company enlightens personal data subjects during the acquisition of personal data. In this context, our Company provides enlightenment to personal data subjects regarding the identity of our Company, the purpose for which personal data will be processed, to whom and for what purpose the processed personal data may be transferred, the method and legal grounds for collecting personal data, and the rights of the data subject under Article 11 of the LPPD.

Article 20 of the Constitution sets forth that everyone has the right to be informed about personal data concerning them. Accordingly, "requesting information" is listed among the rights of the data subject in Article 11 of the LPPD. Within this scope, our Company provides the necessary information in the event that the personal data subject requests information, in accordance with Article 20 of the Constitution and Article 11 of the LPPD.

Furthermore, our Company informs relevant parties about its personal data processing activities primarily conducted in accordance with the law and the principle of honesty through various public documents, notably this Policy document, thereby ensuring accountability and transparency. Additionally, our Company informs relevant persons through many different methods regarding its activities and the matters in the law, particularly when seeking the "explicit consent" of individuals

SECTION 3 – MATTERS RELATING TO THE PROCESSING OF PERSONAL DATA

In accordance with Article 20 of the Constitution and Article 4 of the LPPD, our Company carries out personal data processing activities in a manner that is: in compliance with the law

and the principle of honesty; accurate and, where necessary, up to date; for specific, explicit, and legitimate purposes; and in a relevant, limited, and proportionate manner. Our Company retains personal data for the period stipulated by laws or required by the purpose of personal data processing.

In accordance with Article 5 of the LPPD, our Company processes personal data based on explicit consent or in cases where the consent of the data subject is not required as specified in the second paragraph of the same article.

Our Company may process personal data without explicit consent in the following situations:

- Cases explicitly stipulated in the laws.
- Cases where it is mandatory for the protection of life or physical integrity of the person or another person, who is unable to express their consent due to actual impossibility or whose consent is not granted legal validity.
- Cases where the processing of personal data belonging to the parties of a contract is necessary, provided that it is directly related to the establishment or performance of said contract.
- Situations where it is mandatory for the data controller to fulfill its legal obligation.
- Cases where the data has been made public by the data subject themselves.
- Cases where data processing is mandatory for the establishment, exercise, or protection of a right.
- Cases where data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

In accordance with Articles 8 and 9 of the LPPD, our Company acts in compliance with the regulations stipulated by the law and established by the Personal Data Protection Board regarding the transfer of personal data.

3.1. PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH THE PRINCIPLES PRESCRIBED IN THE LEGISLATION

- **Data Processing in Compliance with the Law and the Principle of Honesty:** Our Company acts in accordance with the principles introduced by legal regulations and the general rule of trust and honesty in the processing of personal data. In this context, our Company considers proportionality requirements in data processing and does not use personal data beyond what the purpose requires.
- **Ensuring Personal Data is Accurate and, Where Necessary, Up to Date:** Our Company ensures that the personal data it processes is accurate and up to date, taking into account the fundamental rights of personal data subjects and its own legitimate interests. Necessary measures are taken in this direction.
- **Data Processing for Specific, Explicit, and Legitimate Purposes:** Our Company clearly and precisely determines the legitimate and lawful purpose of personal data processing. Our Company processes personal data to the extent necessary and in connection with the services it provides. The purpose for which personal data will be processed is established by the Company before the data processing activity begins.

- **Relevance, Limitation, and Proportionality of Data to the Processing Purpose:** Our Company processes personal data in a manner suitable for achieving the determined purposes and avoids processing personal data that is not relevant to or needed for the achievement of the purpose. For instance, personal data processing activities aimed at meeting needs that may likely arise in the future are not conducted.
- **Retention of Data for the Period Stipulated in the Legislation or Required for the Processing Purpose:** Our Company retains personal data only for the period specified in the relevant legislation or required for the purpose for which they are processed. In this context, our Company first determines whether a period is stipulated in the legislation for the retention of personal data; if a period is specified, it acts accordingly; if no period is specified, it retains personal data for the duration necessary for the purpose of processing. Upon the expiration of the period or the disappearance of the reasons requiring processing, personal data is erased, destroyed, or anonymized by our Company.

3.2. PROCESSING OF PERSONAL DATA BASED ON AND LIMITED TO ONE OR MORE OF THE CONDITIONS FOR PROCESSING PERSONAL DATA SPECIFIED IN ARTICLE 5 OF THE LPPD LAW

Pursuant to the third paragraph of Article 20 of the Constitution, personal data may only be processed in cases stipulated by law or with the explicit consent of the person. Accordingly and in compliance with the Constitution, our Company processes personal data only in cases stipulated by law or with the person's explicit consent. While explicit consent is a legal basis, the Company's processing activities are predominantly based on the legal grounds set forth in the second paragraph of Article 5 of the Law. If the processed data is a special category of personal data, the conditions listed below are applied. All processing activities are carried out in accordance with the general principles specified in Article 4 of Law No. 6698 (See Section 3.1):

- Existence of the Explicit Consent of the Personal Data Subject.
- Explicit Stipulation in the Laws.
- Inability to Obtain the Explicit Consent of the Relevant Person Due to Actual Impossibility.
- Direct Relation to the Establishment or Performance of a Contract.
- Fulfillment of the Company's Legal Obligation.
- The Personal Data Subject Making Their Own Personal Data Public.
- Necessity of Data Processing for the Establishment or Protection of a Right.
- Necessity of Data Processing for the Legitimate Interest of Our Company.

3.3. PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA

Our Company acts with sensitivity in compliance with the regulations stipulated in the LPPD regarding the processing of personal data determined as "special category". In accordance with the LPPD, special categories of personal data are processed by our Company provided

that adequate measures determined by the Personal Data Protection Board are taken, in the following cases:

- If the personal data subject has explicit consent, or
- If the personal data subject does not have explicit consent:
    - Special categories of personal data other than health and sexual life, in cases stipulated by law.
    - Personal data relating to health and sexual life, only by persons under an obligation of confidentiality or authorized institutions and organizations for the purpose of protecting public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services and their financing.

3.4. TRANSFER OF PERSONAL DATA

Our Company may transfer the personal data and special categories of personal data of the personal data subject to third parties (third-party companies, group companies, third-party individuals) by taking necessary security measures in line with lawful personal data processing purposes. Our Company acts in accordance with the regulations provided in Article 8 of the LPPD. As a rule, explicit consent is required for the transfer of personal data to third parties; however, data may also be transferred if at least one of the following conditions exists:

- Explicit stipulation in the laws.
- Necessity for the protection of life or physical integrity of the person or another person who is unable to express their consent due to actual impossibility or whose consent is not granted legal validity.
- Necessity for the processing of personal data belonging to the parties of a contract, provided that it is directly related to the establishment or performance of the contract.
- Necessity for the data controller to fulfill its legal obligation.
- The personal data being made public by the data subject themselves.
- Necessity for the establishment, exercise, or protection of a right.
- Necessity of data processing for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

Personal data processed by our Company **is not transferred abroad**.

3.5. PERSONAL DATA PROCESSING ACTIVITIES CONDUCTED AT BUILDING AND FACILITY ENTRANCES AND WITHIN BUILDINGS AND FACILITIES, AND WEBSITE VISITORS

In order to ensure security, our company processes personal data by monitoring guest entries and exits through security cameras in our company buildings and facilities. In this context, our company acts in accordance with the Constitution, the Personal Data Protection Law, the Law on Private Security Services, and other relevant legislation.

Image recordings of our visitors are taken via a camera surveillance system at the entrances to our company's buildings and facilities and within the facilities. Warning signs indicating that camera surveillance is in operation are displayed in the areas where image recordings are taken. Our company's policy on camera surveillance can be accessed at www.olatl.com.

Our company's objectives in conducting security camera surveillance activities include improving the quality of the services provided, ensuring their reliability, safeguarding the security of the company, its customers, and other individuals, and protecting the interests of customers in relation to the services they receive.

In accordance with Article 12 of the Personal Data Protection Law, our company takes the necessary technical and administrative measures to ensure the security of personal data obtained as a result of camera surveillance activities.

In addition to the camera recordings mentioned above, our company processes personal data for the purposes of ensuring security and for the purposes specified in this Policy, in order to monitor the entry and exit of visitors to our company buildings and facilities.

The names and surnames of persons visiting our Company buildings as guests are obtained, and the relevant personal data subjects are informed in this regard through texts posted at the Company or made available to guests in other ways. Data obtained for the purpose of tracking guest entry and exit is processed solely for this purpose, or the relevant personal data is recorded in a physical data recording system.

Our company provides internet access to visitors who request it during their stay in our buildings and facilities for the purposes of ensuring security and as specified in this Policy. In this case, internet access logs are recorded in accordance with the mandatory provisions of Law No. 5651 and the legislation regulated in accordance with this Law; these records are only processed at the request of authorised public institutions and organisations or for the purpose of fulfilling our relevant legal obligations during audit processes carried out within the Company.

Within this framework, only a limited number of Company employees have access to the log records obtained. Company employees with access to the aforementioned records access them solely for use in response to requests from authorised public institutions and organisations or during audit processes and share them with legally authorised persons. The limited number of persons with access to the records declare that they will protect the confidentiality of the data they access by signing a confidentiality agreement.

Our company uses technical means (e.g. cookies) on its website to record the internet activity of visitors to these sites in order to ensure that their visits are carried out in a manner appropriate to their purposes and to display personalised content to them. Detailed information regarding personal data processing activities carried out through cookies can be accessed via the Cookie Information Text.

Detailed explanations regarding the protection and processing of personal data related to these activities carried out by our company are included in the ‘Privacy Policy’ texts on the relevant websites

SECTION 4 – ERASURE, DESTRUCTION, AND ANONYMIZATION OF PERSONAL DATA

As regulated in Article 138 of the Turkish Penal Code and Article 7 of the LPPD (Law on the Protection of Personal Data), personal data shall be erased, destroyed, or anonymized upon our Company’s own decision or upon the request of the personal data subject, in the event that the reasons requiring its processing cease to exist, despite having been processed in accordance with the provisions of the relevant law.

Periodic destruction checks shall be conducted by our Company every six months, and data decided for disposal shall be erased, destroyed, or anonymized ex officio.

In this context, our Company fulfills its relevant obligations by taking necessary technical and administrative measures within the organization; it has developed the required operational mechanisms and ensures the training, assignment, and awareness of the relevant business units to act in accordance with these obligations.

4.1. ERASURE OF PERSONAL DATA

Erasure of personal data is the process of making personal data inaccessible and unusable for the relevant users in any way. In other words, erasure refers to the removal of data from places where it is held—such as documents, hard disks, and CDs—in a manner that ensures it cannot be recycled or recovered.

4.2. DESTRUCTION OF PERSONAL DATA

Destruction of personal data is the process of making personal data inaccessible, irretrievable, and unusable by anyone in any way. In other words, destruction refers to the physical disposal of the document containing the personal data.

4.3. ANONYMIZATION OF PERSONAL DATA

Anonymization of personal data is the process of rendering personal data in such a way that it can no longer be associated with an identified or identifiable natural person under any circumstances, even if matched with other data. For personal data to be considered anonymized, it must be rendered impossible to associate with an identified or identifiable natural person through the use of appropriate techniques relative to the recording medium and the relevant field of activity, such as reversal or matching with other data by the data controller, recipient, or recipient groups.

SECTION 5 – OTHER MATTERS

5.1. RELATIONSHIP BETWEEN OUR COMPANY'S PERSONAL DATA PROTECTION AND PROCESSING POLICY AND OTHER POLICIES

Our Company ensures the implementation of the principles set forth by this Policy within the organization through the policies, procedures, and implementation guides developed for their execution. By establishing links between the policies, procedures, and implementation guides issued regarding the protection of personal data and the core policies and procedures conducted by the Company in other areas, alignment is ensured between processes operated for similar purposes under different policy frameworks.

5.2. TITLES, UNITS, AND JOB DESCRIPTIONS OF THOSE INVOLVED IN PERSONAL DATA RETENTION AND DESTRUCTION PROCESSES

A "Personal Data Protection Committee" has been established by the decision of the Company's Board of Directors to manage this Policy and other related policies, procedures, and implementation guides.

The members of the committee are as follows:

No	Name-Surname	Job Description
1	…….	Committee Chair

No	Name-Surname	Job Description
2	…….	Member
3	…….	Member
4	…….	Member
5	…….	Member

5.3. DUTIES OF THE PERSONAL DATA PROTECTION COMMITTEE

The duties of the Personal Data Protection Committee are as follows:

- To prepare fundamental policies regarding the protection and processing of personal data and any necessary amendments, and to submit them for the approval of senior management for enforcement.
- To decide on how the implementation and auditing of policies regarding the protection and processing of personal data will be carried out, and to submit matters regarding internal assignments and coordination to senior management for approval.
- To identify the measures required to ensure compliance with the Law on the Protection of Personal Data and related legislation, submit them for the approval of senior management, oversee their implementation, and ensure coordination.
- To increase awareness regarding the protection and processing of personal data within the Company and among the Company's business partners.
- To identify potential risks in the Company's personal data processing activities and ensure that necessary measures are taken; to submit improvement proposals for the approval of senior management.
- To design and ensure the execution of training programs regarding the protection of personal data and the implementation of policies.
- To decide on the applications of personal data subjects at the highest level.
- To respond to the requests of personal data subjects regarding the implementation of the Law.
- To coordinate the execution of information and training activities to ensure that personal data subjects are informed about personal data processing activities and their legal rights.
- To follow developments and regulations concerning the protection of personal data and to provide recommendations to senior management regarding the actions to be taken within the Company in accordance with these developments and regulations.
- To coordinate relations with the Personal Data Protection Board and Authority.
- To perform other duties assigned by senior management regarding the protection of personal data

Appendix 1 DEFINITIONS AND ABBREVIATIONS

Explicit Consent	Consent that is specific to a particular matter, based on information, and freely given.
Anonymization	The process of altering personal data in such a way that it loses its personal data characteristics and cannot be reversed. Examples include techniques such as masking, aggregation, data obfuscation, etc., which render personal data unlinkable to a specific individual.
Job Applicant	Real persons who have applied for a job at our company in any way or who have made their resume and related information available for review by our company.
Processing of Personal Data	Any operation performed on personal data, such as obtaining, recording, storing, retaining, modifying, reorganizing, disclosing, transferring, acquiring, making available, classifying, or restricting the use of such data, whether fully or partially automated or non-automated provided it forms part of a data recording system.
Data Subject	The natural person whose personal data is processed.
Customer	Natural persons who use or have used the products and services offered by our Company, regardless of whether they have any contractual relationship with our Company.
Data Processor	A natural or legal person who processes personal data on behalf of the data controller based on the authority granted by the data controller.
Data Controller	A natural or legal person who determines the purposes and means of processing personal data and is responsible for establishing and managing the data recording system.
Visitor	Natural persons who have entered our company's physical premises for various purposes or who visit our websites.
Board	Personal Data Protection Board
Authority	Personal Data Protection Authority
KVKK	Law No. 6698 on the Protection of Personal Data
Regulation	Regulation on the Erasure, Destruction, or Anonymization of Personal Data