
GPDR POLICY

ATALIAN ENTEGRE TESİS YÖNETİMİ HİZMETLERİ A.Ş (ATALIAN) PERSONAL DATA PROTECTION AND PROCESSING POLICY

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1. OBJECTIVE

As ATALIAN ENTEGRE TESİS YÖNETİMİ HİZMETLERİ A.Ş (ATALIAN), our priority is to ensure that the personal data belonging to real persons including our employees, candidate employees, visitors, business contacts, clients, users visiting our website and other third persons are processed in accordance with the applicable legislation, in particular Article 20 of the Constitution of the Republic of Turkey, international treaties regarding human rights, which our country has ratified, and Law No. 6698 on the Protection of Personal Data (“KVKK”), and that those whose data are processed may effectively exercise their rights.

For this reason, we process personal data belonging to those persons including, but not limited to, our clients, employees, candidate employees, visitors, business contacts, suppliers, our users visiting our website, and other third persons, which we obtain while carrying out our activities, in accordance with the ATALIAN Personal Data Protection and Processing Policy (“Policy”).

The protection of personal data and observing the fundamental rights and freedoms of the real persons whose personal data we collect constitute the fundamental principle of our policy regarding the processing of personal data. Therefore, we carry out all of our operations involving the processing of personal information while ensuring the protection of private life, privacy of communication, freedom of thought and belief, and the right to effectively seek legal remedies.

We take all the necessary administrative and technical protection measures to protect personal data in accordance with the applicable legislation and current technological developments.

This policy explains the method we employ, within the framework of the above-mentioned principles specified in the KVKK, when processing (for instance storing, transferring, deleting or anonymising) the personal data collected during our operations

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2. SCOPE

All personal data processed by ATALIAN including, but not limited to, personal data belonging to our employees, candidate employees, suppliers, visitors, business contacts, clients, users visiting our website, and other third persons, are covered by this Policy.

Our Policy applies to all processing activities related to personal data carried out within ATALIAN and ATALIAN subsidiaries and has been considered and drafted in accordance with KVKK No. 6698 and other legislation relating to personal data.

3. DEFINITIONS AND ABBREVIATIONS

Under this Policy, the following terms shall have the following meanings:

3.1. ATALIAN: ATALIAN ENTEGRE TESİS YÖNETİMİ HİZMETLERİ A.Ş (ATALIAN), and the Subsidiaries of ATALIAN

3.2. ATALIAN subsidiaries: Companies in which ATALIAN INTERNATIONAL S.A. is a shareholder,

3.3. Express consent: Freely given, specific, informed, clear and limited consent.

3.4. Anonymisation: to render it impossible for personal data to be associated in any manner with the identity of a real person who is identified or identifiable, even if they are matched with other data.

3.5. Employee: ATALIAN personnel,

3.6. Candidate employee: Person(s) who filed a job application with ATALIAN,

3.7. Personal data subject (Concerned Person): Real persons whose personal data are processed,

3.8. Personal data: Any information relating to an identified or identifiable real person,

3.9. Personal data of a private character: Data belonging to persons, relating to their race, ethnicity, political convictions, philosophical beliefs, religions, denominations or other beliefs, clothing, memberships to associations or unions, their health, sexual life, criminal conviction and security measures, as well as biometric and genetic data,

3.10. Processing of personal data: Any transaction carried out on the data, such as obtaining, recording, storage, preservation, alteration, reorganization, disclosure, transfer, takeover, making available, classifying the personal data or preventing its usage, by fully or partly automatic means, or by non-automatic means provided that they are part of a data recording system.

3.11. Data processor: Real or legal person who processes personal data based on the authority granted by and on behalf of the data controller.

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3.12. Data controller: Real or legal person who determines the purposes and means of processing personal data, and who is responsible for establishment and management of the data recording system.

3.13. KVK Board: the Personal Data Protection Board,

3.14. KVK Corporation: the Personal Data Protection Corporation,

3.15. KVKK: Law No. 6698 on the Protection of Personal Data published in Official Journal Issue 29677 of 7 April 2016,

3.16. Policy: the ATALIAN Personal Data Protection and Processing Policy.

4. ROLES AND RESPONSIBILITIES

4.1. Board of Directors

This Policy was approved by the Board of Directors. The Board of Directors is authorized to ensure that the policy is created, implemented and updated as necessary.

4.2. Data Processing Directorate

The Data-Processing Directorate and the ATALIAN Board of Directors is responsible for the drafting, development, implementation and updating of this Policy. When necessary, ATALIAN may review this Policy in terms of its actuality and development needs when necessary

The Data-Processing Directorate, along with ATALIAN, is responsible for the drafting, development, implementation and updating of this Policy. When necessary, the Data-Processing Directorate reviews this Policy in terms of actuality and development needs

The Data-Processing Department Manager is responsible for the publishing of the prepared document on a website(s) belonging to ATALIAN.

5. LEGAL OBLIGATIONS

Our legal obligations, as data controller, within the scope of the protection and processing of personal data are as follows:

5.1. Our obligation to inform

As data controller, we are obliged, while collecting personal data, to inform the concerned person on the following:

- the purpose for which your personal data shall be processed,

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- Information on our identity, or the identity of our agent, if necessary,
- to whom, and for what purpose, your processed personal data may be transferred,
- Our method of collecting data, and its legal justification, and
- Rights arising from law.

As ATALIAN, we are committed to ensure that this Policy, which is publicly available, is clear, comprehensible and readily available.

5.2. Our obligation to ensure data security

We take all necessary administrative and technical measures in accordance with the applicable legislation to ensure the security of the personal data under our responsibility. Obligations and the measures taken in connection with data security are specified in part 11 of this Policy.

6. CLASSIFICATION OF PERSONAL DATA

6.1. Personal Data

Protection of personal data is applicable to real persons only and any information relating to a legal person which does not include any information relating to a real person is not covered by this Policy. Therefore, this Policy does not apply to data belonging to legal persons.

6.2. Personal Data of a Private Nature

Data belonging to persons, relating to their race, ethnicity, political convictions, philosophical beliefs, religions, denominations or other beliefs, clothing, memberships to associations or unions, their health, sexual life, criminal conviction and security measures, as well as biometric and genetic data, are considered personal data of a private nature.

6.3. Categories of Personal Data

We collect the following information within the scope of our company's activities:

- i. Identity Information
- ii. Contact Information

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- iii. Information on Family Members
- iv. Financial Data
- v. Personnel Data
- vi. Other Data

Data Category	Identity Information
Remarks	Data related to the identification of an individual. From whom they are collected We collect identity information from our clients, our candidate clients, our employees, our business contacts, our consumers and the third persons with whom we cooperate.
Contents	Name, surname, Turkish Identification Number, passport number, vehicle registration information, and photocopy of identity card.
The purpose of collecting the data	We collect identity information belonging to our employees and clients for the purpose of completing the necessary formalities pursuant to the legislation to which we are subject. We collect identity information belonging to our employees for the purpose of carrying out the human resources activities related to the position for which an application is filed. We are obliged to record our employees' identity information in accordance with the Labour and Employment Legislation, Social Security Legislation, and Occupational health and Safety Legislation. We collect our clients' identity information in accordance with the legislation to which we are subject, or for the purpose of providing servicing or plant management services. We collect identity information belonging to persons with which we have a business relationship, such as suppliers and subcontractors, for the purpose of meeting commercial requirements and fulfilling obligations, and to perform our contractual obligations, if any.
Legal basis for collecting data	The basic reason for collecting the data in question is to fulfill our obligation arising from the applicable legislation, and the agreements executed.

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We also collect identity information due to our contractual relationship with the concerned persons.

In certain cases we collect identity information in line with our legitimate interests and the ATALIAN principles we have adopted.

Data collection method	We collect data directly from the concerned through printed forms, and sometimes directly via electronic forms, and telephone and GSM calls.
Data Category	Contact Information
Remarks	Personal data allowing communication with an individual.
From whom they are collected	We collect identity information from our candidate clients, our employees, our business contacts, our suppliers, and the third persons with whom we cooperate.
Contents	Data such as electronic mail addresses, home addresses, home telephone numbers, mobile phone numbers.
The purpose of collecting the data	<p>We collect contact information belonging to our clients in accordance with the legislation to which we are subject, for the purpose of providing information on our services.</p> <p>We collect identity information belonging to our employees for the purpose of carrying out the human resources activities related to the position for which an application is filed.</p> <p>We are required to record our employees' contact information in accordance with the Labour legislation, and Labour and Social Security legislation.</p> <p>We collect contact information belonging to our clients in accordance with the legislation, and for the purpose of carrying servicing and plant maintenance and providing support services.</p> <p>We collect contact information belonging to persons with which we have a business relationship, such as suppliers and subcontractors, for the purpose of meeting commercial requirements and fulfill our obligations, and to perform our contractual obligations, if any.</p>
Legal basis of collecting data	The basic reason for collecting the data in question is to fulfill the obligations arising from the applicable legislation.

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	<p>We also collect contact information due to our contractual relationship with the concerned persons.</p> <p>In certain cases we collect contact information in line with our legitimate interests and the ATALIAN principles which we have adopted.</p>
Data collection method	We collect data through printed forms, and sometimes directly via electronic forms, electronic mail, telephone and GSM.
Data Category	Information on Family Members
Remarks	Personal data belonging to the family members of the concerned person.
From whom they are collected-	We collect data on family members from our candidate employees and employees.
Contents	Data such as names, surnames, Turkish identification numbers, photographs, marital status information, home and work addresses, mobile phone numbers, fax numbers, home telephone numbers, mail and electronic mail addresses belonging to family members.
The purpose of collecting the data	<p>We collect information on our candidate employees' family members for the purpose of evaluating their job applications.</p> <p>We are required to obtain information on our employees' family members in accordance with the labour legislation, and labour and social security legislation.</p>
Legal basis of collecting data	<p>The basic reason for collecting the data in question is to fulfill our obligations arising from the applicable legislation.</p> <p>We also collect contact information on family members due to our contractual relationship with the concerned persons.</p> <p>In certain cases, we collect such data for our legitimate interests, and for purposes such as contacting the relevant party in case of emergencies, in accordance with our ATALIAN principles.</p>
Data collection method	We collect data through printed forms, and sometimes directly via electronic forms, telephone and GSM.
Data Category	Financial Data

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Remarks	Data such as bank account information, credit card information, tax plate information and invoice information.
From whom they are collected-	We collect financial information from our clients, candidate employees, employees and business contacts, customers and consumers.
Contents	Data such as wages, salary, bank account, credit card, invoice information and tax number.
The purpose of collecting the data	We collect financial information belonging to our clients for the purpose of issuing invoices. We are required to obtain financial information belonging to our employees and our candidate employees in accordance with the labour and social security legislation and tax legislation. We collect financial information belonging to persons with whom we have a business relationship, such as clients, suppliers and subcontractors, for the purpose of meeting commercial requirements and fulfilling obligations, and to perform our contractual obligations, if any.
Legal basis of collecting data	The basic reason for collecting the data in question is to fulfill our obligations arising from the applicable legislation. We also collect financial information due to our contractual relationship with the concerned persons. In certain cases we collect financial information for the purpose of, for instance, including our employees in campaigns and promotions offered by banks and other financial institutions with which we cooperate, in line with our legitimate interests and the ATALIAN principles which we have adopted.
Data collection method	We collect data through printed forms, and sometimes directly via electronic forms, telephone and GSM.
Data Category	Personnel Data
Remarks	Information required to pursue the business relationship in accordance with legislation.
From whom they are collected-	We collect personnel data from our employees and candidate employees.

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Contents	Data such as position / title information, diplomas and certificates, employment history and details, references/service/employment certificates obtained from previous employers, resumés, educational status, official correspondence on the employee, Social Security Agency job entry notices, Social Security Agency job termination notices, blood group, health reports, criminal records, handicap reports, periodical examination reports, former conviction reports, military service status information.
The purpose of collecting the data	We collect data on our employees and candidate employees in accordance with the service contracts we execute with them, the legislation to which we are subject, and in line with our legitimate interests.
Legal basis of collecting data	The basic reason for collecting the data in question is to fulfill our obligations arising from the applicable legislation. We also collect personnel information due to our contractual relationship with the concerned persons. In certain cases, we collect such data for our legitimate interests, and for purposes such as placing candidate employees in suitable positions, in accordance with our ATALIAN principles.
Data collection method	We collect data through printed forms, and sometimes directly via electronic forms, telephone and GSM.
Data Category	Other Data
Remarks	Other data collected within the scope of our ATALIAN operations.
From whom they are collected-	We collect these information from our clients, candidate employees, employees, business contacts and customers.
Contents	Signatures, health information, information on criminal conviction and security measures, device information and access records, Occupational Health and Safety conformity information, complaints, and data collected during company communication processes.

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The purpose of collecting the data	Data belonging to employees are collected for the purpose of fulfilling our obligations arising from the employment and service contracts (payment of salaries etc.). We also collect these data to ensure security. We collect data belonging to persons with whom we have a business relationship, such as suppliers and subcontractors, for the purpose of meeting commercial requirements and fulfilling our obligations, and to perform our contractual obligations, if any.
Legal basis of collecting data	The basic reason for collecting the data in question is to fulfill our obligations arising from the applicable legislation. We also collect these information due to our contractual relationship with the concerned persons. In certain cases, we collect such data for our legitimate interests, and, for instance, for purposes such as increasing the quality of the services offered, in accordance with our ATALIAN principles.
Data collection method	We collect data through printed forms, and sometimes directly via electronic forms, telephone and GSM.

7. PROCESSING OF PERSONAL DATA

7.1. Our Principles Governing the Processing of Personal Information

We process personal data in accordance with the following principles.

7.1.1. Processing while observing the Law and Principle of Good Faith.

We process the personal data in compliance with the principle of good faith and in a transparent manner within the scope of our obligation to notify.

7.1.2. Ensuring that the Personal Data is Accurate and Up-To-Date when Necessary

We take the necessary measures in our data processing procedures in order to ensure that the processed data are accurate and up-to-date. We ensure that the Personal Data Owner can contact us to update his data and rectify any mistake with regards to his processed data.

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7.1.3. Processing for specific, clear and legitimate purposes

As ATALIAN, we process personal data for our legitimate purposes within a clear scope and content determined for continuation of our activities in line with the applicable legislation and within the framework of the ordinary course of trade.

7.1.4. Processing the personal data to the extent it is relevant, limited and proportionate to the purposes for which data are processed,

We process personal data to the extent it is relevant, limited and proportionate to our clear and express purposes.

We do not process unrelated personal data or personal data which are not required to be processed. Accordingly, we do not process personal data of a private nature unless legally required, or, where we are required to process such data, we obtain the express consent of the concerned person on the subject.

7.1.5. Storing personal data for the periods prescribed by law or as required by our legitimate interests

The applicable legislation requires us to keep the personal data for a certain period of time. Therefore, we store the processed personal data for a period stipulated under the applicable legislation or for a period required for the purposes of processing personal data.

We delete, destroy or anonymize personal data if the period of storage stipulated under the legislation expires or the purposes of processing are no longer valid. Our principles and procedures relating to storage periods are specified in the related article of this Policy.

7.2. Our purposes of processing personal data

As ATALIAN, we process personal data for the following purposes:

- The planning and management of commercial services and operations within ATALIAN,
- The planning and management of advertisement, promotion and other related operations within ATALIAN,
- Ensuring the fulfillment of our legal obligations arising from the Social Security Legislation, Labour Legislation, the Tax Procedural Law No. 213, regulations made by the Ministry of Trade, and other applicable provisions of legislation,
- The planning and performance of activities of national and international nature,
- The planning and management of employment requirements,
- Continuing our relationship with suppliers and other third persons,

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- The training of employees,
- Creating and managing records of visitors and guests,
- Ensuring the security of the facilities,
- Monitoring and preventing illegal and unauthorised actions,
- Planning and carrying out risk management and quality improvement works,
- Invoicing in exchange for our services,
- Managing all kinds of claims and complaint processes related to our operations,
- Providing information to the Ministry of Labour and Social Security and other concerned public bodies and corporations in accordance with the applicable legislation,
- Providing private insurance companies with the requested information within the scope of the financing of Service and Plant Management services,
- Providing the necessary information in line with the inspections carried out by regulatory and auditing institutions and official bodies,
- Ensuring financial reconciliation with contracted private and public corporations with respect to servicing and plant maintenance and management services which are offered,

No personal data processing is carried out in the event that the processing activities carried out for the above purposes fail to meet any legal requirement stipulated in KVKK, and express consent is requested in order to record the personal data in question. Such personal data are processed if ATALIAN is provided with express consent on the subject.

7.3. Processing of personal data and personal data of a private nature

7.3.1. Processing of personal data by obtaining express consent

Pursuant to legislation, personal data may not be processed without obtaining the express consent of the data owner. The law defines express consent as “*consent in relation to a specific matter, based on being informed, provided of one's own free will.*” The explanations provided hereunder shall apply in the case where the processed data are personal data of a private character.

7.3.2. Lawful reasons where express consent is not required

We may process personal data without the need to obtain express consent where the following justifications exist:

- Where expressly prescribed by law

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Personal data belonging to the concerned may be processed lawfully in cases where it is explicitly stipulated by law.

- Failure to obtain the express consent of the concerned due to physical impossibility

Personal data may be processed without having to obtain express consent in cases where it is mandatory for the protection of life or bodily integrity of a person who is incapable of giving his/her consent due to physical impossibility or whose consent is legally invalid, or of another person .

- Being directly related to the execution or performance of the contract

In case it is necessary, it is possible to process personal data belonging to the parties of a contract, provided that it is directly related to the conclusion or performance of said contract.

- Where it is compulsory for ATALIAN to fulfill its legal obligations

As data controller, ATALIAN shall be authorized to process personal data, the processing of which is required in order for ATALIAN to fulfill a legal obligation, without having to obtain the consent of the data owner.

- Where such data are made public by the concerned.

Personal data that were made public by the concerned, in other words, that have been disclosed to the public in any manner, may be processed without the need to obtain express consent.

- Where the processing of data is mandatory for the institution, exercise or protection of a right

In case data processing is mandatory for establishing, exercising or protecting a right, personal data of the data subject may be processed.

- Where processing data is mandatory for ATALIAN's legitimate interests

Personal data may be processed without requiring express consent in cases where the processing of data is mandatory for ATALIAN's legitimate interests, provided that the fundamental rights and freedoms of the concerned are not prejudiced. (For instance, you being monitored in the event that you visit the company headquarters or its subsidiaries)

7.3.3. Processing of personal data of a private nature

Article 6 of the Law stipulates that certain personal data which bears the risk of victimization and discrimination of the persons if processed illegally, are designated as "private" personal data. Such data are those relating to race, ethnicity, political convictions, philosophical beliefs, religions, denominations or other beliefs, clothing, memberships to associations, foundations or unions, health, sexual life, criminal conviction and security measures, as well

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as biometric and genetic data. Pursuant to KVKK, personal data of a private nature may be processed by our Company in the following cases, provided that adequate measures to be determined by the KVK Board are taken:

- Personal data of a private nature other than those concerning the health and sexual life of the personal data owner, in cases where prescribed by law,
- Personal data of a private nature relating to the personal data owner's health and sexual life may be processed by persons who are bound by a duty of confidentiality or by authorized corporations and institutions for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning and management of health care services and financing.

7.4. Processing of personal data collected through the use of cookies on our websites

AS ATALIAN, we maintain the following website:

- www.atalian.com.tr

We use cookies to develop the operation and use of our web pages. Moreover, we also use some cookies to ensure that your preferences concerning our website are remembered to provide you with an improved and customized experience.

We may collect, transfer, retain and otherwise process your personal data through the cookies on our website.

If you do not want your personal data to be collected and processed via cookies, you can disable the cookies on our website.

You may refer to our "Cookie Policy" posted on the websites for detailed information on the cookies we use on our websites.

7.5. Processing of personal data over websites

In order to provide service over the web page, we may collect and process your

- Name and surname,
- Telephone number,
- E-mail,
- Wireless network, and
- Location

information.

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7.6. Processing of personal data collected for human resources and employment purposes

We process the personal data that you share with us while filing your application as a candidate employee for the purpose of reviewing your job application and retain such data for the required period of time upon your consent in order to evaluate them with regard to any future vacancy position at ATALIAN. The processing of the personal data your share as a candidate employee is carried out in accordance with the principles and rules specified under this Policy.

Personal data belonging to candidate employees may be collected and processed for the purposes of

- Assessing the suitability of the candidate employee for the vacancy
- Confirming the accuracy of the information and documents provided by the candidate employee, or conducting research on the candidate employee,
- Contacting the candidate employee in connection with their application,
- Fulfilling legal obligations or the requirements of authorized bodies or corporations,
- Improving our Human Resources Policy,

through the use of the following tools and methods:

- printed or electronic application form,
- Resumés communicated by candidate employees to ATALIAN via e-mail, mail etc.,
- Employment or consultancy companies,
- Universities,
- During interviews,
- Checks and investigations carried out to confirm the accuracy of the information provided by the candidate employee,
- recruitment tests.

Other than under this Policy, personal data belonging to our employees are collected, processed and stored within the framework of the *requirements of ATALIAN Human resources*. Our employees are also aware of rules applying to the processing of personal data.

7.7. Processing of personal data within the scope of the operations carried out by ATALIAN ENTEGRE TESİS YÖNETİMİ HİZMETLERİ A.Ş (ATALIAN)

We process, transfer, store for as long as required by the data processing purpose, and otherwise process various of your personal data within the scope of ATALIAN Services.

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Your express consent, based on detailed information in accordance with the requirements stipulated by legislation, shall be obtained prior to any data processing activity to be carried out by ATALIAN for a purpose other than those falling within its fields of operation.

7.7.1. Processing of personal data within the scope of on-line actions

In order to provide fast, effective and secure manner the servicing and plant maintenance and management services that we provide to our clients, we provide support services through our technical staff over our website developed by ATALIAN. Within this scope, we collect, communicate to the concerned technical staff, store and process contact information such as;

- Name and surname,
- E-mail address, and
- Mobile phone number.

7.7.2. Cookie Policy

Cookies are files created by previously visited websites, which store browsing information such as website choices or profile information when you download a file or visit a website.

Cookies may be used via the company website in order to ensure the best possible use of our company's website, and to improve the visitors' user experience. If you do not wish to use of cookies, you may delete or disable the Cookies through your browser's settings. You will be considered to have agreed to the use of cookies on our company's website unless you change the cookie settings on your browser. Cookies may be used to transfer information concerning the product or service groups in which our customers or visitors are interested and to advertise products and/or services for the purpose of better serving our clients or visitors.

7.8. Processing of personal data within the scope of national and international projects

As ATALIAN, in order to ensure that national and international projects carried out in line with our founding objective, are completed effectively and safely , we share information such as

- Name and surname,
- Title, and
- Mobile phone,

belonging to our employees, and information such as

- Name and surname,

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- Photograph, and
- Information regarding work carried out

belonging to our clients, with domestic and foreign corporations with which we cooperate, as well as storing and otherwise processing such information.

7.9. ATALIAN's processing of data processed by ATALIAN subsidiaries

In order for Atalian subsidiaries to carry out their operations in line with Atalian principles and targets, personal data processed by Atalian subsidiaries may also be processed by Atalian within the boundaries set by legislation.

7.10. Processing of personal data within the scope of ensuring general security

As ATALIAN, we may collect, store and use data belonging to visitors and other third persons, particularly to our clients and employees, for purposes of ensuring general security. To this end, for security purposes we obtain, through CCTV systems, camera images of persons who are present at our company and keep such recordings for the periods prescribed by applicable legislation.

7.11. Processing of personal data within the scope of services

Through our call center we process information regarding our clients including, but not limited to, the following, for purposes such as assessing customer satisfaction:

- Name and surname,
- The problem experienced in relation to the relevant service and
- The unit from which services were required.

8. TRANSFER OF PERSONAL DATA

8.1. Domestic transfer of personal data

As ATALIAN, we act in compliance with the regulations stipulated in KVKK, and the resolutions adopted by the KVK Board, with regard to the transfer of personal data.

Without prejudice to the exceptions specified in the law, personal data and personal data of a private nature may not be transferred to third persons without the express consent of the concerned.

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8.2. Transfer of personal data abroad

As a rule, personal data may not be transferred abroad without the express consent of the data owner. However, in the event that any of the exceptions specified in this Policy exist, personal data may be transferred abroad without the need to obtain express consent if such third persons reside abroad:

- resides in a foreign country where adequate level of protection is available, as announced by the KVK Board, or
- In case they reside in a foreign country where there is not an adequate level of protection, if the data controllers in Turkey and abroad commit, in writing, to provide an adequate level of protection and the permission of the KVK Board is obtained.

8.3. Third persons to whom personal data are transferred by ATALIAN

Personal data may be transferred to the categories of persons listed below in accordance with the rules specified hereunder:

- ATALIAN business partners,
- ATALIAN suppliers,
- ATALIAN officials,
- Legally authorized public bodies and corporations,
- Legally authorized private persons.

Person Category	Remarks	Purpose of Transfer
Business Partner	Refers to parties such as national or international companies with which ATALIAN has established a business partnership for the purpose of purchasing goods and services, selling goods and services etc.	For the purpose of carrying out the activity planned within the scope of the business partnership
Supplier	Refers to parties who offer services and sell goods to ATALIAN under a contract in accordance with ATALIAN's needs and instructions.	For the purpose of performing the service to be obtained from the supplier
Official	Refers to the officials of ATALIAN and ATALIAN's subsidiaries.	For the purposes of planning and conducting the operations of ATALIAN and ATALIAN's subsidiaries

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Legally Authorized Public Bodies and Corporations	Refer to public bodies and corporations authorized to obtain information and documents from ATALIAN within the scope of applicable legal regulations.	For the purposes prescribed by the applicable legislation
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Legally Authorized Private Persons	Refer to private persons authorized to obtain information and documents from ATALIAN within the scope of the applicable legislation.	For the purposes prescribed by the applicable legislation
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8.4. Measures we have taken to ensure that personal data are processed in compliance with law

8.4.1. Technical Measures

We take certain measures including, but not limited to, the following for the purpose of protecting personal data. Within this scope, we;

- Making the required internal technical arrangements for the processing and storage of personal data in compliance with the applicable legislation,
- Create the technical infrastructure required to ensure the security of databases in which your personal data shall be stored,
- Review situations involving risk and create the necessary technological solutions,
- Monitoring and supervising the established technical infrastructure processes
- Identify procedures regarding the reporting of the technical measures and the supervision processes,
- Periodically update and renew the technical measures,
- Using antivirus systems, firewalls and similar software or hardware security products and establishing security systems that are in line with the current technological developments, and employ staff specialized in technical fields.

8.4.2. Administrative measures

We take certain measures including, but not limited to, the following for the purpose of protecting personal data. Within this scope, we;

- Create policies and procedures to access personal data, including for those employed within ATALIAN or ATALIAN subsidiaries,
- Informing and training our employees regarding protection and processing of personal data in accordance with the law,

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- Record the measures to be taken in the case of the unlawful processing of personal data by our employees in the contracts we execute with our employees and/or the policies we create, and
- Supervision of the personal data processing activities of the data processors that we work with or their shareholders.

9. STORAGE OF PERSONAL DATA

9.1. Storing personal data for the period specified by legislation or as long as required by their purpose of processing

Without prejudice to the storage periods prescribed by legislation, we store personal data for the term required by the data processing purpose, within the scope of the ATALIAN ENTEGRE TESİS YÖNETİMİ HİZMETLERİ A.Ş (ATALIAN) Personal Data Retention and Destruction Policy.

If we process personal data for more than one purpose, we delete, destroy or anonymize them when the purpose of processing is no longer valid or upon the request of the Data Owner provided that the applicable legislation authorizes deletion of the same. We comply with the provisions of the applicable legislation and the KVK Board resolutions regarding destruction, deletion or anonymization of personal data.

9.2. Measures taken for the storage of personal data

9.2.1. Technical Measures

- Establishment of technical infrastructure and supervision mechanisms for the deletion, destruction and anonymization of personal data,
- Taking necessary measures for safe storage of personal data,
- Recruit staff having technical expertise,
- Preparation of business continuity and contingency plans for potential risks and development of systems for implementation of the same,
- Set up security systems in line with technological developments related to the storage areas of personal data.

9.2.2. Administrative Measures

- We raise awareness by informing our staff on the technical and administrative risks related to the storage of personal data, and

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- In case collaboration is established with third persons for the storage of personal data, ensure that provisions are inserted in agreements executed with the companies to which personal data are transferred, that necessary security measures are taken to protect and securely store transferred personal data.

10. DELETION, DESTRUCTION OR ANONYMISATION OF PERSONAL DATA

Personal data shall be deleted, destroyed or anonymised

- If our objectives for processing have been altogether completed, or
- Upon request of the data owner

Such deletion, destruction and anonymisation processes are carried out in accordance with the ATALIAN ENTEGRE TESİS YÖNETİMİ HİZMETLERİ A.Ş (ATALIAN) Personal Data Retention and Destruction Policy, without prejudice to the provisions of applicable legislation.

When our personal data are being deleted, destroyed or anonymised, the security measures specified in this Policy are shall be taken, and the provisions of the “Regulation on the Deletion, Destruction or Anonymisation of Personal Data” shall be applicable.

Unless otherwise indicated by the Board, ATALIAN may choose any method of deletion, destruction or anonymisation it considers fit.

Without prejudice to the decisions made by the board and the provisions of applicable legislation, ATALIAN shall delete or destroy the personal data in accordance with the method indicated by the data owner.

11. SECURITY OF PERSONAL DATA

11.1. Our obligations regarding the security of personal data

As ATALIAN, for the purposes of

- preventing the unlawful processing of personal data,
- preventing unlawful access to personal data,
- preventing the unlawful storage of personal data,

We take administrative and technical measures in line with technological facilities and application costs.

11.2. Measures taken to prevent the unlawful processing of personal data

- We conduct, and have conducted, the necessary inspections within ATALIAN,
- Training and informing our employees regarding lawful processing of personal data,

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- If cooperation is established with third parties for processing of personal data, including in the agreements executed with the companies which process personal data, provisions to ensure that personal data processors take necessary security measures,
- In case of unlawful disclosure of personal data or data leakage, notifying the KVK Board and conducting necessary examinations and taking necessary precautions as per the applicable legislation.

11.3. Technical and administrative measures taken to prevent unlawful access to personal data

In order to prevent unlawful access to personal data, we;

- Recruit staff having technical expertise,
- Periodically update and renew the technical measures,
- Create access restriction procedures within ATALIAN,
- Identify procedures regarding the reporting of the technical measures and the supervision processes,
- Establishment of data registration systems used within ATALIAN in accordance with the applicable legislation and conducting periodical audits for the same,,
- Preparing emergency action plans for potential risks and developing systems for implementation of the same
- Training and informing our employees about access to and authorization for personal data,
- If cooperation is established with third parties for processing and storage of personal data, including in the agreements concluded with the companies which access personal data, provisions to ensure that the persons who access personal data take necessary security measures,
- Use the most current and safe security systems in line with technological development for the purpose of preventing unlawful access to personal data.

11.4. Measures taken against the unlawful disclosure of personal data

We take necessary administrative and technical measures to prevent unlawful disclosure of personal data and update them in accordance with our related procedures. A system is set up to carry out the necessary procedures in order to notify the concerned person and the KVK Board in the event that we discover that personal data have been unlawfully disclosed.

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In the event of an unlawful disclosure despite all administrative and technical measures taken, this will be announced on the KVK Board's website or by means of another method if deemed necessary by the KVK Board.

12. RIGHTS OF CONCERNED PERSONS

We inform the concerned person within the scope of our obligation to inform and establish the necessary systems and infrastructures for such information. We make the necessary technical and administrative arrangements to enable the Personal Data Owner to exercise their rights regarding their personal data.

The data owner is entitled to exercise the following rights with respect to the personal data belonging to them:

- Learn whether or not their personal data have been processed,
- Request information on the procedure, if personal data have been processed,
- Obtain information on the purpose of processing personal data and find out whether personal data has been used as fit for the purpose,
- Obtain information about the third persons to whom personal data were communicated domestically or abroad,
- Request the correction of personal data that may have been incompletely or inaccurately processed,
- Request the deletion or destruction of personal data in the event that the reasons for the processing of the personal data have ceased to exist.
- Request notification of the operations carried out for rectification and deletion or destruction as mentioned above, to third parties to whom personal data have been transferred;
- Object to the occurrence of a result which is detrimental to the person concerned as a result of analyzing the processed data exclusively through automatic systems,
- Request compensation for damages in the case where damages are sustained as a result of the illegal processing of personal data,

12.1. Exercise of rights related to personal data

Without prejudice to the other methods determined by the Board , the data owner may forward their claims regarding their personal data to the e-mail address info.tr@atalianworld.com,

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or to Aydınevler Mh. Preveze Sokak No: 9/1 Maltepe/Istanbul via mail, by attaching documents which certify their identity (copy of birth certificate, etc.) to their application.

In order to exercise the above-mentioned rights, the data owner must indicate the request in a clear and comprehensible manner, in the application containing the explanations related to the right, the exercise of which is requested.

Although it is required that the subject of the claim must be related to the applicant, in the event that a request is filed on behalf of another person, the applicant must have authorization to file that request, and such authorization must be documented (specific power of attorney). Also, such application must contain identity and address information, and documents evidencing identity must be attached to the application.

Requests made by unauthorized third persons on behalf of others shall not be considered.

12.2. Evaluation of the application

12.2.1. Term for responding to an application

We will fulfill requests concerning personal data as soon as possible considering the nature of the request and within 30 days at the latest and free of charge or in case the operation necessitates a separate cost as per the conditions specified in the tariff determined by the KVK Board regarding fees, then against the fee to be determined as per the related tariff.

Additional information and documents might be requested when filing or evaluating the application.

12.2.2. Our right to reject an application

Applications relating to personal data may be rejected under circumstances including, but not limited to, the following:

- Processing personal data for purposes such as research, planning and statistics after being anonymised through official statistics,
- Processing personal data for purpose of art, history, literature or scientific purposes, or within the scope of freedom of expression, provided that the privacy or personal rights of the concerned person are not violated, or these do not constitute a crime,
- Processing personal data made public by the concerned person,
- The application is not based on a valid reason,
- The application containing a request that is contrary to applicable legislation, and
- A failure to comply with the application procedure.

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12.3. Method of evaluating an application

In order for the response period specified in article 12.2.1 hereof to start, the applications must be delivered by hand, via registered mail or via notary public by means of an ATALIAN KVK Application Form in writing bearing an original signature, or over KEP bearing an electronic signature, or through the electronic mail address communicated previously by the concerned person and registered in the data controller's system.

If the request is accepted, the related operation is carried out and the data owner is notified in writing or electronically. If the request is denied, the reason for denial shall be communicated to the applicant in print or on electronic media.

12.4. Right to complaint to the Personal Data Protection Board

In the cases where the application is rejected, replied unsatisfactorily, or not replied in due time, the applicant shall be entitled to lodge a complaint with the KVK Board within 30 (thirty) days of receiving an answer or, in any case, within 60 (sixty) days following the application date.

13. PUBLICATION AND STORAGE OF THE POLICY

This Policy shall be kept in two different forms, that is, in print and electronically. The current versions of the documents can be found on the ATALIAN websites.