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Policy on Protection and Privacy of Personal Data

Document Details	
Document Title:	Policy on Protection and Privacy of Personal Data
Document Content:	The objective of this policy is to establish the rules in relation to the method and procedures for the protection of Personal Data
Reference/ Justification	Law on the Protection of Personal Data No. 6698
Approved by:	Üniteks Tekstil Gıda Motorlu Araçlar San. ve Tic. A.Ş. Executive Board

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POLICY ON PROTECTION AND PRIVACY OF PERSONAL DATA

I. DATA PRIVACY WARRANTY

- 1.1. This Policy for Protection and Privacy of Personal Data (“**Policy**”) determines the rules which Üniteks Tekstil Gıda Motorlu Araçlar Sanayi ve Ticaret A.Ş. (“**Company**”) must adhere to within the Company and/or by the Company when carrying out their obligations pursuant to relevant regulations, particularly the Law of Personal Data Protection No. 6698 and when processing Personal Data.
- 1.2. The Company, in terms of the Personal Data within its own system, warrants to act in accordance with this Policy and the procedures to be implemented based on the Policy.

II. PURPOSE OF THE POLICY

The main purpose of this Policy is to determine the rules in relation to the methods and procedures related to the protection and processing of Personal Data by the Company.


III. SCOPE OF THE POLICY

- 3.1. This Policy encompasses all operations related to the Personal Data processed by the Company and is applied to said operations.
- 3.2. This Policy cannot be applied to data which does not bear the qualification of Personal Data.
- 3.3. This Policy can be modified with the approval of the Executive Board from time to time, when deemed necessary by either the PDP Regulations, Company Data Controller Representative or the Committee. In case of discrepancy between the PDP Regulations in force and the Policy, the provisions of the PDP Regulations shall prevail.

IV. DEFINITIONS

The definitions mentioned in this Policy have the following meanings;

“**Explicit Consent**” is the consent in relation to a specific topic based on informing and given with free will.

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“**Anonymization**” refers to rendering it impossible for personal data to be associated in any manner with a real person identity of whom is identified or identifiable, even if they are matched with other data.

“**Obligation to Inform**” is obligation to inform the Data Subjects as per Article 10 of the LPDP of the Data Controller or the person authorized in this respect, while collecting Personal Data.

“**Personal Data**” is any kind of information about an identified or identifiable real person (in the context of this Policy, it will also include the “Special Categories of Personal Data,” under the condition that it is in line with the expression “Personal Data.”)

“**Processing Personal Data**” means any transaction performed on the data, such as obtaining, recording, storage, preservation, alteration, reorganization, disclosure, transfer, takeover, making obtainable, classifying the personal data or blocking the usage of it, by fully or partly automatic means, or by non-automatic means provided that they are part of a data recording system.

“**Committee**” refers to the committee responsible for the implementation of this Policy and the PPD Procedures to be applied in accordance with the Policy.


“**Board**” refers to the Personal Data Protection Board.

“**Authority**” refers to the Personal Data Protection Authority.

“**LPDP**” is the Law on Personal Data Protection No. 6698.

“**PPD Regulations**” refers to the Law on Personal Data Protection No. 6698 and other regulation in relation to the protection of Personal Data, binding decisions, principle deliberations, provisions, directives and applicable international agreements regarding data protection and all other kinds of regulations given by regulatory and supervisory authorities, courts and other official authorities.

“**PPD Policies**” refers to the policies on personal data protection which are released by the Company.

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“**PDP Procedures**” refers to the procedures which determine the obligations which the Company employees, the Committee and Data Controller Representative need to adhere to in the context of this Policy.

“**Special Categories of Personal Data**” refers to the data in relation to race, ethnic origin, political opinion, philosophic belief, religion, sect or other beliefs, appearance, membership to associations, foundations or unions, health, sexual life, imprisonment and security measures and biometric and genetic data are special categories of personal data.

“**Deletion**” Deletion of Personal Data in a way that it becomes inaccessible or unusable by the related users.

“**Data Inventory**” Inventory including information such as the Personal Data Processing procedures and methods in terms of the Company’s Personal Data Processing operations, Personal Data Processing purposes, data category, third parties to whom Personal Data is transferred to, maximum period for processing personal data determined in line with the data subject group, precautions to be taken for transfer of data to abroad or regarding data security etc.


“**Data Processor**” The real or legal persons which process the Personal Data in the name of the Data Controller upon obtaining approval from the Data Controller.

“**Data Subject**” all real persons processed by a Personal Data Company or in the name of the Company.

“**Data Controller**” The real or legal persons who processes Personal Data by determining the Personal Data Processing purposes and processing methods, builds and manages the data recording system.

“**Contact Person**” refers to the real person who is assigned by the Data Controller in the course of the registration for the communication to be established with the Authority regarding the PPD Regulations.

“**Data Controller Representative**” refers to the person who is president of Committee which is responsible for the implementation of the Company's data protection policies and being compliance with the PPD Regulations in accordance with Articles 367 and 371 of the Turkish Commercial Code, and is assigned by Board of Directors.

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V. PRINCIPLES OF PROCESSING PERSONAL DATA

5.1. Processing of Personal Data in accordance with Law and Integrity Rules

Personal Data are processed by the Company in accordance with law and integrity rules and based on the proportionality principle.

5.2. Taking Necessary Precautions to Ensure Personal Data is Correct and Up-to-date

The Company takes all necessary precautions for the Personal Data to be complete, accurate and up-to-date and in the instance of the Data Subject requesting any changes to the Data within the scope of PPD Regulations, updates the Personal data accordingly.

5.3. Processing of Personal Data in Accordance with Specific, Open and Legitimate Purposes


Prior to Processing Personal Data, the purpose of the Personal Data Processing is determined by the Company. In this context, the Data Subject is informed in respect to the PDP Regulations and Explicit Consent is obtained when necessary.

5.4. Being Personal Data in Connection with and Limited to the Purpose of Processing and Measured

The Company only issues the Data in the scope of the PDP Regulations in exceptional instances (LPDP Article 5.2 and Article 6.3) or in within the framework of the purpose of the Explicit Consent obtained from the Data Subject (LPDP Article 5.1 and Article 6.2) and in accordance with the principle of proportionality. Data Processor shall process the Personal Data in the manner suitable for achieving the purposes determined and shall avoid to process the unnecessary or irrelevant Personal Data for achieving the purposes.

5.5. Preservation of Personal Data for a Sufficient Period Stipulated under the Relevant Legislation or for the Period Required for the Processing Purpose

- 5.5.1.** The Company preserves Personal data in accordance with their purpose for as long as necessary. In the instance which the Company wishes to preserve the Personal Data for a longer period than is necessary in terms of the Personal Data

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Processing purpose or longer than prescribed by the PDP Regulations, the Company acts in adherence to the obligations indicated in the PDP.

- 5.5.2.** After the period required to fulfill the Personal Data Processing purpose, Personal Data is either Deleted or Anonymized. In this sense, the third parties to whom the Company has transferred to the Personal Data is also ensured to Delete, to Destroy or Anonymize the Personal Data.
- 5.5.3.** Data Controller Representative and Committee are responsible for the performance of the Deletion, Destruction and Anonymization operations. In this respect, the necessary procedure is organized by the Data Controller Representative and the Committee.


VI. PROCESSING OF PERSONAL DATA

Personal Data can only be processed by the Company in the context of the rules and procedures indicated below:

6.1. Explicit Consent

- 6.1.1.** Personal Data is processed upon informing within the framework of carrying out the Obligation to Inform Data Subjects and in the instance which the Data Subject gives Explicit Consent.
- 6.1.2.** In the scope of the Obligation to Inform, Data Subjects are informed of their rights prior to obtaining Explicit Consent.
- 6.1.3.** The Explicit Consent of the Data Subject is obtained with methods in accordance with the PDP Regulations. Explicit Consent is preserved by the Company in accordance with the PDP Regulations in a provable manner.
- 6.1.4.** The Data Controller Representative and Committee are obligated to ensure the Obligation to Inform is fulfilled in terms of Personal Data Processing procedures and that Explicit Consent is obtained and preserved when necessary. All department employees processing Personal Data are obligated to follow the instructions of the Data Controller Representative and Committee, this Policy and the attachment to the Policy, the PDP Procedures.

6.2. Processing of Personal Data without Obtaining Explicit Consent

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6.2.1 In instances which Personal Data is stipulated to be processed without Explicit Consent in the context of PDP Regulations (LPDP Article 5.2), the Company can process the Personal Data without obtaining the Data Subject's Explicit Consent. In the instances which Personal Data is processed in this manner, the Company processes the Personal Data within the limits determined by the PDP Regulations. In this context:

6.2.1.1. Personal Data can be processed by the Company without Explicit Consent in the instance which it is expressly permitted by any law.

6.2.1.2. Personal Data can be processed by the Company without Explicit Consent in the instance which a Data Subject is unable to express their consent due to physical impossibility or whose consent is not legally recognized or for the protection of the life or wellbeing of the Data Subject and/or another person apart from the Data Subject.


6.2.1.3. If the condition of ensuring there is a direct relation with the establishment or execution of a contract, the Personal Data of the parties involved can be processed by the Company without the Explicit Consent of the Data Subjects.

6.2.1.4. If the processing of the Personal Data is imperative for the Company to fulfill their legal obligations, Personal Data can be processed by the Company without the Explicit Consent of the Data Subjects.

6.2.1.5. Personal Data publicized by the Data Subject can be processed by the Company without Explicit Consent.

6.2.1.6. If the processing of Personal Data without Explicit Consent is the only possible way to establish, use or protect a right, the Personal Data can be processed by the Company without Explicit Consent within the knowledge of the Data Controller Representative.


6.2.1.7. Under the condition of not causing any harm to the rights and freedoms of the Data Subject, in the instance which data processing is imperative

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for the Company's legitimate interest, Personal Data can be processed by the Company without Explicit Consent.

VII. PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA

- 7.1. Special Categories of Personal Data can only be processed with the Explicit Consent of the Data Subject or if deemed obligatory in the law to openly process in terms of Special Categories of Personal Data, except for sexual life and personal health data.
- 7.2. Personal Data in relation to health and sexual life can only be processed without Explicit Consent for the purpose of protecting public health, for carrying out preventative medicine, medical diagnosis, treatment and care services, for the planning and management of health services and financing by persons under the obligation of secrecy (e.g. Company doctor) or authorized institutions and organizations.
- 7.3. When Special Categories of Personal Data is processed, precautions determined by the Board are taken.
- 7.4. Regarding the employees involved in the processing of Special Categories of Personal Data, the Data Controller will:
 - 7.4.1 Organize regular trainings on PDP Regulations and protection of Special Categories of Personal Data,
 - 7.4.2 Enter into confidentiality agreements,
 - 7.4.3 Define the periods and scope of authorities for the employees who have the authority to access Special Categories of Personal Data,
 - 7.4.4 Periodically conduct access controls,
 - 7.4.5 Immediately remove the authorities of employees whose duties have changed or who are no longer employed by the Company and immediately retrieve the Data Inventory assigned to the respective employees.
- 7.5. In case Special Categories of Personal Data is transferred to electronic environment, the Data Controller will take the following measures regarding the electronic environments that Special Categories of Personal Data is processed, stored and/or accessed:
 - 7.5.1 Store the Special Categories of Personal Data using cryptography techniques.
 - 7.5.2 Store the cryptographic keys in secure and different environments.

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- 7.5.3 Securely log records of all activities on Special Categories of Personal Data.
 - 7.5.4 Follow up security updates, conduct necessary security tests regularly or have them conducted by a third party, record the result of these tests regarding the environments in which Special Categories of Personal Data are stored.
 - 7.5.5 In case Special Categories of Personal Data is accessed through a software, authorize users for this software, regularly conduct security tests of this software or have the tests conducted by a third party and record the results of these tests.
 - 7.5.6 Provides a two-step ID verification system in case Special Categories of Personal Data are accessed remotely.
- 7.6. In case Special Categories of Personal data is processed, stored and/or accessed in a physical environment, the Data Controller will:
- 7.6.1 Make sure the necessary safety precautions (against electrical leakage, fire, flood, theft etc.) are taken in the environment that Special Categories of Personal Data is stored.
 - 7.6.2 Block the unauthorized entries by ensuring the security of these environments.
- 7.7. In case of transfer of Special Categories of Personal Data, the Data Controller will:
- 7.7.1 Use encrypted company e-mail addresses or Registered Electronic Mail (“REM”) if Special Categories of Personal Data is required to be transferred via e-mail.
 - 7.7.2 Use cryptography techniques and store the cryptographic key in another environment in case Special Categories of Personal Data is required to be transferred via USB, CD, DVD etc.
 - 7.7.3 Conduct the transfer by establishing VPN between the servers or by using SFTP technique in case Special Categories of Personal Data is required to be transferred between servers located in different physical environments.
 - 7.7.4 Take necessary measures against documents theft, missing or being seen by unauthorized persons and send the documents in “confidential document” format in case Special Categories of Personal Data is required to be transferred in paper.
- 7.8. In addition to the regulations above, the Data Controller will comply with the Personal Data Protection Guide published by the Committee and other regulations in order to ensure safety of Personal Data including Special Categories of Personal Data.

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7.9. In each instance which Special Categories of Personal Data is required to be processed, the Data Controller Representative is informed by the relevant employee.

7.10. If it is not clear whether a piece of data is Special Categories of Personal Data or not, the opinion of the Data Controller Representative is sought by the relevant department.

VIII. DURATION OF PERSONAL DATA PRESERVATION

Personal Data are kept in the Company for the duration of the legal preservation period, and are preserved for the period necessary to fulfill the purposes indicated in the operations related to this data and this Policy. Personal data which has reached its end of purpose and has reached the end of their legal preservation period are deleted, destructed or anonymized by the Company in accordance with the Article 7 of the LPDP.

IX. DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA


9.1. When the legitimate purpose of processing Personal Data is no longer valid, the relevant Personal Data is either Deleted, Destroyed or Anonymized. The instances which Personal Data is required to be Deleted, Destroyed or Anonymized are monitored by the Data Controller Representative and Committee.

9.2. Data Controller Representative and Committee are responsible for the performance of the Deletion, Destruction and Anonymization operations. In this respect, the necessary procedure is organized by the Data Controller Representative and the Committee.

9.3. The Company does not store Personal Data with the consideration that it may be used in the future.

9.4. All operations of Deletion, Destruction and Anonymization of Personal Data that the Company carry out will be in accordance with the principles indicated in the Policy On Storage, Destruction And Anonymization Of Personal Data.

X. TRANSFER OF PERSONAL DATA AND PROCESSING OF PERSONAL DATA BY THIRD PARTIES

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The Company, by taking precautions in line with Personal Data Processing purposes may transfer Personal Data to a third party real or legal person in Turkey or abroad pursuant to the PDP Regulations. This way, the Company also ensures the third parties to whom they have transferred the Personal Data to will also adhere to this Policy. In this respect; necessary regulations are added to contracts drawn with the third party. All kinds of clauses to be added to the contracts drawn with third parties to whom the Personal Data is sent to, are obtained from the Data Controller Representative. Every employee is obligated to go through the procedure stated in this Policy in the instance of transferring Personal Data. In the instance of the third party to whom the Personal Data is transferred, requests a modification in the clause transferred by the Data Controller Representative, the situation is immediately relayed to the Data Controller Representative by the employee.

10.1. Transfer of Personal Data to Third Parties in Turkey

- 10.1.1.** Personal Data may be transferred by the Company to third parties in Turkey in exceptional conditions indicated in the LPDP Article 5.2 and Article 6.3 by taking required precautions, without Explicit Consent or in other conditions provided that the Explicit Consent is obtained from the Data Subject (LPDP Article 5.1 and Article 6.2).
- 10.1.2.** Ensuring the transfer of Personal Data to third parties in Turkey is in accordance with the PDP Regulations is the responsibility of the Company employees and the Data Controller Representative, respectively.

10.2. Transfer to Third Parties Abroad

- 10.2.1.** Personal Data may be transferred by the Company to third parties overseas in exceptional conditions indicated in the LPDP Article 5.2 and Article 6.3, without Explicit Consent or in other conditions provided that the Explicit Consent is obtained from the Data Subject (LPDP Article 5.1 and Article 6.2).
- 10.2.2.** In the instances which Personal Data is transferred without obtaining Explicit Consent, in accordance with PDP Regulations, one of the conditions listed below is required in terms of the foreign country it will be transferred to:

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10.2.2.1.For the status of the foreign country which the Personal Data is transferred to, to be amongst the countries which have sufficient protection, determined by the Board (please refer to the Board’s updated list),

10.2.2.2.In the instance which the foreign country where the data will be transferred is not in the Board’s list of safe countries, for permission to be obtained by the Company and the Data Controller in the relevant country with a written warranty in relation to ensuring sufficient protection.

10.2.3. Ensuring the transfer of Personal Data to third parties is in accordance with the PDP Regulations is the responsibility of Company employees and the Data Controller Representative, respectively.

XI. THE COMPANY’S OBLIGATION TO INFORM


11.1.The Company informs the Data Subject prior to Processing Personal Data pursuant to the Article 10 of LPDP. In this respect; the Company carries out their Obligation to Inform during the process of obtaining Personal Data. The process of informing Data Subjects in the scope of the Obligation to Inform includes the following:

- 11.1.1.** The ID of the Data Controller, and if present, the representative’s ID,
- 11.1.2.** The purpose for processing of Personal Data,
- 11.1.3.** To whom and for what purposes the processed Personal Data will be transferred,
- 11.1.4.** Method of and legal grounds for collecting Personal Data,
- 11.1.5.** Rights of the Data Subject stated under Article 11 of LPDP.

11.2. The Company, pursuant to the 20th Article of the Constitution of the Republic of Turkey and the Article 11 of the LPDP, provides the Data Subject the necessary information upon their request.

11.3. If requested by the Data Subjects in accordance with PDP Regulations, the Company informs the Data Subject of the Personal Data of the Data Subject that they have processed.

11.4. Ensuring the Obligation to Inform is fulfilled prior to the Processing of Personal Data is the responsibility of the employee overseeing the related process and the Data Controller Representative, respectively. In this respect; the aim of reporting each new instance of

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processing to the Data Controller Representative and the necessary PDP Procedure is constructed by the Data Controller Representative and the Committee.

- 11.5.** If the Data Processor is a third party apart from the Company, the third party's adherence to the obligations indicated above must be warranted by the third party with a written contract prior to the commencement of Processing Personal Data. In the instances which third parties transfer Personal Data to the Company, the clauses to be added to the contracts are obtained from the Data Controller Representative. In the instance of a third party transferring Personal Data to the Company, each and every employee is obligated to go through the procedure indicated in this Policy. In the instance of the third party transferring the Personal Data requesting a modification in the clause provided by the Data Controller Representative, the employee immediately informs the Data Controller Representative.

XII. RIGHTS OF THE DATA SUBJECT

- 12.1.** The Company responds to the requests of Data Subjects whose Personal Data they have possession of in accordance with the PDP Regulations:

- 12.1.1.** Whether or not the Personal Data has been processed by the Company,
- 12.1.2.** Requesting information on the procedure, if personal data has been processed,
- 12.1.3.** Obtain information on the purpose of processing personal data and find out whether personal data were used as fit for the purpose,
- 12.1.4.** Obtain information about the third persons to whom personal data were transferred domestically or abroad,
- 12.1.5.** Requesting the correction of Personal Data that may be incompletely or inaccurately processed by the Company,
- 12.1.6.** In the instances which the grounds for processing Personal Data are no longer valid in terms of purpose, duration and legitimacy, requesting the Personal Data to be Deleted or destroyed by the Company,
- 12.1.7.** Objection to the occurrence of a result at the detriment of the Data Subject by analyzing the Processed Data exclusively through automated systems,
- 12.1.8.** In case of correction, Deletion or Destruction of Personal Data, requesting informing third parties to whom that such data is transferred,
- 12.1.9.** Requesting indemnification of damages in the case that damages are suffered by the Data Subject as a result of the illegal processing of Personal Data,

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Data Subjects, in the instances which they wish to exercise their rights and/or believe the Company is not acting in accordance with this Policy when processing Personal Data, may send their request by filling forms provided under the Company internet address or in a way determined by the Personal Data Protection Board to the secure e-mail address of the Data Controller (before each application, it should be checked whether the e-mail address is up to date), through e-mail address of the Data Subject recorded under the Company's data base (it should be checked whether such e-mail is recorded under the data base of the Company) or with a registered electronic mail (KEP), secure electronic signature or mobile signature; or to the mail address below, which may change on occasion, along with a written petition with a wet-ink signature either submitted in person or via a notary, or in other manners that might be determined by the Personal Data Protection Board in the future. Current application procedures must be checked from the legislation before application.

Data Controller: Üniteks Tekstil Gıda Motorlu Araçlar Sanayi ve Ticaret A.Ş.

Registered Electronic Mail (REM): uniteks@hs03.kep.tr


E-Mail: kvk.basvuru@uniteks.com.tr

Postal Address: 10039 Sokak, No.26, Çiğli/İzmir


- 12.2.** In the instance which Data Subjects submit their requests in relation to their rights listed above in written form to the Company, the Company will conclude the request in 30 days at most, depending on the nature of the request, free of charge. In the instance which a cost arises in relation to the finalization of the request by the Data Controller, fees indicated in the tariff determined by the Protection of Personal Data Board may be requested by the Data Controller.

XIII. DATA MANAGEMENT AND SECURITY

- 13.1.** The Company assigns a Data Controller Representative and forms a Committee in order to carry out the obligations in the scope of the PDP Regulations, to ensure and monitor the application of required PDP Procedures required for the implementation of this Policy, and to generate suggestions in relation to these operations.
- 13.2.** All employees involved in the process regarding the protection of the Personal Data in accordance with this Policy and PDP Procedures are responsible for the operation, respectively.


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- 13.3.** Personal Data Processing operations carried out by the Company are monitored with technical systems within technical means available and the cost of application.
- 13.4.** For Personal Data Processing operations, personnel with technical knowledge are recruited.
- 13.5.** Company employees are informed and trained regarding the protection and legal processing of Personal Data.
- 13.6.** To ensure Company employee's access to the Personal Data they are required to access, necessary PDP Procedure is created and the Data Controller Representative and Committee are responsible, respectively, for the construction and implementation of this.
- 13.7.** Company employees may access Personal Data within the authority that they are assigned and in accordance with related PDP Procedures. All kinds of access and processing carried out in a manner which exceeds the authority of the employee is considered to be illegal and a cause for termination of their employment on justifiable grounds.
- 13.8.** In the instance which a Company employee is in doubt of the sufficient protection of Personal Data or the instance which they have identified such a security gap, they are to immediately inform the Data Controller Representative.
- 13.9.** In regards to the security of Personal Data, a detailed PDP Procedure is drawn up by the Data Controller Representative and the Committee.
- 13.10.** Each person who has been assigned a Company device is responsible for the security of the device they have been assigned for their use.
- 13.11.** Every Company employee or employee working within the Company is responsible for the security of the physical files that are found within their area of responsibility.
- 13.12.** In the instances which security measures requested for the security of Personal Data within the scope of PDP Regulations or those requested in addition, all employees are obligated to abide by the additional security measures and ensure the sustainability of these security measures.

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- 13.13.** Virus protection systems and firewall software and hardware are set up in line with technological developments for the safe storage of Personal Data in the Company.
- 13.14.** Back-up programs and sufficient security measures are used to prevent the loss of or damage to Personal Data in the Company.
- 13.15.** Documents which carry Personal Data in the Company are protected with cryptographic systems. In this respect; Personal Data cannot be stored in communal areas or on desktops. Files and folders and such documents which hold Personal Data cannot be carried onto desktops or communal folders; information in Company computers cannot be transferred to a USB or other device without the prior written approval of the Data Controller Representative, or be taken out of the Company.
- 13.16.** The Committee, together with the Board of Directors, has the obligation to take all necessary technical and administrative measures to ensure the protection of Personal Data found in the Company, to keep constant track of developments and administrative operations and prepare necessary PDP Procedures, to announce them upon approval and ensure and monitor adherence to them. In this framework; the Committee and Data Controller Representatives organize necessary training in order to increase awareness of employees.
- 13.17.** If a department within the Company is Processing Special Categories of Personal Data, this department is informed by the Committee of the importance, security and confidentiality of the Personal Data they are processing and act in accordance with the directives transferred by the Committee. Authority to access Special Categories of Personal Data is only granted to a limited number of employees and this list, along with its monitoring, is carried out by the Committee.
- 13.18.** All the Personal Data processed within the Company is considered by the Company to be “Confidential Information.”
- 13.19.** Company employees have been informed that their obligations in relation to the security and confidentiality of Personal Data continues after employment has ended and warrants from employees in regard to these rules have been obtained by the Company.

XIV. TRAINING

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14.1. The Company provides its employees with necessary training concerning the protection of Personal Data with regards to the Policy and the PDP Procedures and LPDP Regulations included in its attachment.

14.2. In the training sessions, Special Categories of Personal Data definitions and applications of protection are especially touched upon.

14.3. If a Company employee is accessing Personal Data either physically or via computer, the Company provides the employee training specific to this access.

XV. INSPECTIONS

The Company has the right to monitor ex officio at all times without giving prior notice whether all Company employees, departments and contractors are acting in accordance with this Policy and PDP Regulations, and conducts necessary routine inspections in this effect. The Committee and Data Controller Representative create a PDP Procedure for these inspections, presents it to the Executive Board for approval and ensures the procedure is applied.


XVI. VIOLATIONS

16.1 The operation, transaction or action which a Company employee believes to be in violation of the rules and procedures indicated in the PDP Regulations and this Policy, they notify it to the related department director. The department director, will forward such issue via e-mail to the Committee member of the related department with required documents, by cc'ing the Committee's group e-mail. The Committee constructs an action plan in accordance with this Policy and PDP Procedures in regards to the violation.

16.2 As a result of the briefing, the Committee prepares notifications for the Data Subject or the Authority, taking into account the PDP Regulations and the obligations of current regulations. The Data Controller Representative manages the communication and correspondence with the Authority.

XVII. RESPONSIBILITIES

The responsibilities within the company, are, respectively, employee, department, Data Controller Representative. In this context; The Committee and Data Controller Representative

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in charge of the implementation of the Policy are assigned with the decision of the Company Board of Directors and changes in this context are carried out, again, in the same manner.

XVIII.AMENDMENT OF THE POLICY

18.1 This Policy may be amended by the Company on occasion with the approval of the Executive Board.

18.2 The Company shares the Policy text with its employees, updated in a manner which enables amendments to be examined, via e-mail or presents it to employees and Data Subjects via the web address below.

Related Web Address: <http://www.uniteks.com.tr/>

XIX. EFFECTIVE DATE OF POLICY

This version of this Policy on Protection and Privacy of Personal Data has entered into effect with the approval of the Company Executive Board on **21/01/2019**.