

**TOFAŞ TÜRİK OTOMOBİL FABRİKASI
A.Ş.
PROTECTION AND PROCESSING OF
PERSONAL DATA POLICY**

**INFORMATION FORM ON THE TOFAŞ TÜRK OTOMOBİL FABRİKASI ANONİM ŞİRKETİ
PROTECTION AND PROCESSING OF PERSONAL DATA POLICY**

Document Name:

Tofaş Türk Otomobil Fabrikası Anonim Şirketi Protection and Processing of Personal Data Policy

Targeted Audience:

All natural persons whose personal data are processed by Tofaş Türk Otomobil Fabrikası A.Ş. excluding employees of Tofaş Türk Otomobil Fabrikası A.Ş.

Prepared By:

Tofaş Türk Otomobil Fabrikası Anonim Şirketi Personal Data Protection Committee

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In cases where there is a conflict between the Turkish version which is the original language of the text and any translation of the policy, the Turkish text shall prevail.

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PART 1 INTRODUCTION

1.1. INTRODUCTION

As Tofaş Türk Otomobil Fabrikası Anonim Şirketi ("**Tofaş**" or "**Company**"), protection of personal data is among the most important priorities within the scope of the business activities we carry out. Within the framework of this Tofaş Türk Otomobil Fabrikası Anonim Şirketi Protection and Processing Of Personal Data Policy ("**Policy**"), the principles adopted in the execution of personal data processing activities carried out by our Company and the basic principles adopted in terms of compliance of our Company's data processing activities with the provisions contained in the Personal Data Protection Law No. 6698 ("**Law**") are explained and detailed information regarding all personal data processing activities carried out by our Company is set out and thus, the necessary transparency is provided by informing the personal data owners. With full awareness of our responsibility within this scope, your personal data is processed and protected within the scope of this Policy.

The activities carried out by our Company regarding the protection of personal data of our employees are managed under the Tofaş Türk Otomobil Fabrikası Anonim Şirketi Employees Personal Data Protection and Processing Policy, which has been written in parallel with the principles in this Policy.

1.2. SCOPE

This Policy relates to all personal data of persons other than our Company's employees, processed by wholly or partially automated or non-automated means provided that they are part of any data recording system. The detailed information regarding these data subjects may be found in the Annex 2 ("*Annex 2 – Data Subjects*") document of this Policy.

1.3. IMPLEMENTATION OF THE POLICY AND THE RELEVANT LEGISLATION

Relevant applicable regulations on the processing and protection of personal data shall be primarily applied. In case of non-compliance between the current legislation and the Policy, our Company accepts that it is subject to all applicable legislation. The Policy regulates the rules set forth in the relevant legislation by concretizing them within the scope of Company's practices.

1.4. EXECUTION OF THE POLICY

The effectivity date of this Policy is 10.09.2024.

In the event that all or certain articles of the Policy are renewed, the effective date of the Policy will be updated. The Policy is published on our Company's website (www.tofas.com.tr) and made accessible to the data subjects upon the request of the personal data subjects.

PART 2 MATTERS CONCERNING THE PROTECTION OF PERSONAL DATA

2.1. ENSURING PERSONAL DATA SECURITY

Our company takes the necessary measures according to the nature of the data to be protected in order to prevent the unlawful processing, access, transfer or security deficiencies that may occur in other ways in accordance with the Article 12 of the Law. In this context, our Company takes administrative measures to ensure the required level of security in accordance with the guidelines issued by the Personal Data Protection Board ("**Board**") and conducts audits by itself or third parties.

2.2. PROTECTION OF SPECIAL CATEGORIES OF PERSONAL DATA

Special categories of personal data is given special importance under the Law due to the risk of causing victimization or discrimination when processed unlawfully. In accordance with Article 6 of the Law, "special categories" of personal data are defined as race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership to associations, foundations

or union membership, criminal conviction and security measures, health, sexual life, and biometric and genetic data.

The technical and administrative measures taken by our Company for the protection of personal data and the adequate measures stipulated in the Board's Decision No. 2018/10 dated 31/01/2018 in terms of special categories of personal data are taken within the scope described in the Data Security Policy for the Processing of Special Categories of Personal Data and the works carried out in this direction are monitored and audited within the framework of the audits carried out within our Company.

Detailed information on the processing of special categories of personal data is provided in section 3.3 of this Policy.

2.3. INCREASING AWARENESS AND AUDITING BUSINESS UNITS ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

Our Company ensures that the necessary trainings are organized for the business units in order to raise awareness in order to prevent unlawful processing of personal data, unlawful access to data and to ensure the protection of data. The training and awareness activities organized by the Company are based on the "Personal Data Security Guide" published by the Board on its official website.

With the trainings and awareness activities carried out, it is aimed to ensure that the personal data processing activities of our Company's employees during the fulfillment of their job duties are carried out in accordance with the Law and secondary legislation.

Our Company establishes the necessary systems to ensure that its current employees and new employees are aware of the protection of personal data and works with consultants if necessary. In this direction, our Company evaluates the participation in relevant trainings, seminars and information sessions and organizes new trainings in parallel with the updating of the relevant legislation.

PART 3 MATTERS CONCERNING THE PROCESSING OF PERSONAL DATA

3.1. PROCESSING PERSONAL DATA IN ACCORDANCE WITH THE PRINCIPLES ENVISAGED IN THE LEGISLATION

3.1.1. Processing in Accordance with Lawfulness and Fairness

Personal data are processed in accordance with the general rule of trust and honesty so as not to harm the fundamental rights and freedoms of individuals. Within this framework, personal data are processed to the extent and limited to the extent required by the business activities of our Company.

3.1.2. Ensuring Personal Data to Be Accurate and Kept Up to Date Where Necessary

Our Company takes the necessary measures to ensure that personal data is accurate and up-to-date throughout the period of processing, and establishes the necessary mechanisms to ensure the accuracy and up-to-dateness of personal data for certain periods.

3.1.3. Processing for Specified, Explicit and Legitimate Purposes

Our Company expressly sets forth the purposes of processing personal data and processes them within the scope of purposes related to these activities in line with its business activities.

3.1.4. Processing to be Relevant, Limited and Proportionate to the Purposes for which They are Processed

Our Company collects personal data only in the quality and to the extent required by its business activities and they are processed limited to the specified purposes.

3.1.5. Retention for the Duration Envisaged in the Relevant Legislation or Required for the Purpose for which they are Processed

Our Company retains personal data for the period required for the purpose for which they are processed and for the minimum period envisaged in the relevant legislation. In this context, our Company first determines whether a period of time is envisaged for the retention of personal data in the relevant legislation, and if a duration is determined, it acts in accordance with this duration. If there is no legal period, personal data are retained for the duration required for the purpose for which they are processed. Personal data are disposed of at the end of the specified retention periods in accordance with the periodic disposal periods or in accordance with the application of the data subject and with the specified disposal methods (deletion and/or destruction and/or anonymization).

3.2. PERSONAL DATA PROCESSING CONDITIONS

Except for the explicit consent of the data subject, the basis of the personal data processing activity may be one of the conditions stated below and more than one condition may be the basis of the same personal data processing activity. In case the processed data is one of the special categories of personal data, the conditions in the part 3.3 (*"Processing of Special Categories of Personal Data"*) of this Policy shall be applied.

(i) Based on the Explicit Consent of Data Subject

One of the conditions for the processing of personal data is the explicit consent of the data subject. The explicit consent of the data subject should be disclosed on a specific subject, based on information and free will.

In the presence of the following personal data processing conditions, personal data may be processed without the explicit consent of the data subject.

(ii) It is Expressly Provided for by the Laws

If the personal data of the data subject are expressly stipulated in the law, in other words, if there is a clear provision in the relevant law regarding the processing of personal data, it may be subject to this data processing condition.

(iii) Failure to Obtain the Explicit Consent of the Data Subject Due to Physical Disability

Personal data of data subject may be processed in case it is necessary for the protection of life or physical integrity of the person itself or of any other person, who is unable to explain its consent due to the physical disability or whose consent is not deemed legally valid.

(iv) It is Directly Related to The Establishment or Performance of The Contract

This condition may be deemed to be fulfilled if the processing of personal data is necessary provided that it is directly related to the establishment or performance of a contract to which the data subject is a party.

(v) Fulfillment of Legal Obligations of the Company

Personal data of the data subject may be processed if the processing is necessary for our Company to fulfill its legal obligations.

(vi) Making Personal Data Public by the Data Subject

If the data subject has made its personal data public, the relevant personal data may be processed limitedly for the purpose of making it public.

(vii) Processing of Data is Necessary for Establishment or Protection of Any Right

Personal data of data subject may be processed in case processing of data is necessary for establishment or protection of any right.

(viii) Processing Of Data Is Necessary for The Legitimate Interest of Our Company

Personal data of data subject may be processed in case processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

3.3. PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA

Processing of special categories of personal data is prohibited as a rule. However, Tofaş processes special categories of personal data in accordance with the principles set forth in this Policy and in the existence of the following grounds specified in Article 6 of the Law:

(i) Explicit Consent of the data subject

One of the conditions for processing special categories of personal data is the explicit consent of the data subject. The explicit consent of the data subject must be related to a specific subject, based on information and freely given.

In the presence of the following special categories of personal data processing conditions, personal data may be processed without the explicit consent of the data subject:

(ii) Explicitly Stipulated by Laws

If the special categories of personal data of the data subject are explicitly stipulated in the law, in other words, if there is a clear provision in the relevant law regarding the processing of special categories of personal data, this data processing condition may be mentioned.

(iii) Failure to Obtain Explicit Consent of the Data Subject Due to Physical Disability

The personal data of the data subject may be processed if it is mandatory to process the personal data of the data subject in order to protect the life or physical integrity of the data subject or another person who is unable to disclose his/her consent due to actual impossibility or whose consent cannot be recognized as valid.

(iv) Publicization of Special Categories of Personal Data of the Data Subject

In the event that the data subject has made his/her special categories of personal data public in accordance with his/her own will to make it public, the relevant special categories of personal data may be processed limited to the purpose of making it public.

(v) Data Processing is Mandatory for the Establishment or Protection of a Right

If data processing is mandatory for the establishment, exercise or protection of a right, the special categories of personal data of the data subject may be processed.

(vi) Processing is Necessary within the Scope of Relevant Purposes by Persons Under Secrecy Obligation or Authorized Institutions and Organizations

Special categories of personal data of the data subject may be processed by persons under the obligation of confidentiality or authorized institutions and organizations; if necessary for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, and the planning, management and financing of health services.

(vii) Processing for the Fulfillment of Legal Obligations Regarding Employment, Occupational Health and Safety, Social Security, Social Services and Social Assistance

In the event that it is mandatory to fulfill legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance, the special categories of personal data of the data subject may be processed.

(viii) Processing Regarding Foundations, Associations and Other Non-Profit Organizations or Entities Established for Political, Philosophical, Religious or Trade Union Purposes

Foundations, associations and other non-profit organizations or formations established for political, philosophical, religious or trade union purposes; provided that they comply with the legislation to which they are subject and their purposes, are limited to their fields of activity and are not disclosed to third parties; may process special categories of personal data of the data subject for their current or former members and members or persons who are in regular contact with these organizations and formations.

3.4. INFORMING THE DATA SUBJECTS

Our Company informs the data subjects in accordance with Article 10 of the Law and secondary legislation. In this regard, as the data controller, our Company informs the data subjects about who, for what purposes the personal data are processed, with whom they are shared, with which methods they are collected, the legal reasons and the rights within the scope of the processing of their personal data.

3.5. TRANSFER OF THE PERSONAL DATA

Our Company may transfer the personal data and special categories of personal data of the data subject to third parties (third party companies, public and private authorities, third real persons) by taking the necessary security measures in line with the legitimate personal data processing purposes. Our Company acts in accordance with the regulations set forth in Article 8 of the Law in this regard. Detailed information on this subject may be found in the Annex 3 (*Annex 3 – Third Persons Whom Personal Data are Transferred and the Purposes for the Transfers*) document of this Policy.

3.5.1. Transfer of the Personal Data to Domestic Third Parties

If one or more of the following data processing conditions ("**Data Processing Conditions**") are present, personal data may be transferred to third parties by our Company by taking all necessary measures and taking all necessary security measures, including the methods stipulated by the Board.

- Consent of the data subject to the transfer of his/her personal data to domestic third parties,
- Relevant activities regarding the transfer of personal data are expressly stipulated in the laws,
- Transfer of personal data by the Company is directly related to and necessary for the establishment or performance of a contract,
- Transfer of personal data is necessary for our Company to fulfill its legal obligations,
- Transfer of personal data by our Company limited to the purpose of making it public, provided that the personal data have been made public by the data subject,
- Transfer of personal data by the Company is necessary for the establishment, exercise or protection of the rights of the Company or the data subject or third parties,
- Transfer of personal data is necessary for the legitimate interests of the Company, provided that it does not violate the fundamental rights and freedoms of the data subject,
- It is necessary for the protection of the life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid.

3.5.2. Transfer of Personal Data to Third Parties Residing Abroad

The transfer of personal data abroad by our Company will be carried out in accordance with Article 9 of the Law and the principles set out in this Policy by taking technical and administrative measures in the scope described below:

(i) Transfer Based on the Adequacy Decision Made About the Relevant Country, International Organization or Sectors within the Country

Personal data may be transferred abroad by the Company if one of the conditions specified in Articles 5 and 6 of the Law exists and there is an adequacy decision issued by the Board regarding the country, international organization or sectors within the country to which the transfer will be made.

The adequacy decision is issued by the Board and published in the Official Gazette. The Board may also seek the opinion of relevant institutions and organizations if necessary. The adequacy decision is evaluated every four years at the latest. The Board may modify, suspend or revoke the adequacy decision with prospective effect as a result of the assessment or as otherwise deemed necessary.

(ii) Transfer Based on Appropriate Safeguards

In the absence of an adequacy decision, personal data may be transferred abroad by the Company if one of the following appropriate safeguards is provided by the parties, provided that one of the personal data processing conditions specified in Articles 5 and 6 of the Law exists and the data subject has the opportunity to exercise his/her rights and apply for effective legal remedies in the country where the transfer will be made:

- **Special Transfer Reason for Public Institutions and Organizations or Professional Organizations of Public Nature:** Existence of an agreement that is not in the nature of an international agreement between public institutions and organizations or international organizations abroad and public institutions and organizations or professional organizations in the nature of a public institution in Türkiye and the Board's authorization of the transfer.
- **Binding Corporate Rules:** Existence of binding corporate rules approved by the Board and containing provisions on the protection of personal data, which companies within the group of undertakings engaged in joint economic activities are obliged to comply with.
- **Standard Contracts:** Existence of a standard contract announced by the Board, including data categories, purposes of data transfer, recipients and recipient groups, technical and administrative measures to be taken by the data importer, additional measures taken for special categories of personal data, and notifying the Board about this standard contract within the legal periods.
- **Undertaking:** Existence of a written undertaking containing provisions to ensure adequate protection and authorization of the transfer by the Board.

(iii) Transfer Based on Derogations

Personal data may be transferred abroad by the Company in the absence of an adequacy decision and if one of the appropriate safeguards cannot be provided, provided that it is incidental, in the presence of one of the following situations:

- **Informed Special Explicit Consent for Possible Risks:** The explicit consent of the data subject to the transfer, provided that the data subject is informed about the possible risks.
- **Execution of the Contract and Implementation of Pre-Contractual Measures:** The transfer is necessary for the performance of a contract between the data subject and the controller or for the implementation of pre-contractual measures taken upon the request of the data subject.
- **Third Party Contracts for the Benefit of the Data Subject:** The transfer is necessary for the conclusion or performance of a contract between the controller and another natural or legal person for the benefit of the data subject.
- **Necessity for Important Reasons of Public Interest:** The transfer is necessary for an important reason of public interest.
- **Establishment, Exercise or Protection of a Right:** The transfer of personal data is mandatory for the establishment, exercise or protection of a right.
- **Vital Interest:** The transfer of personal data is mandatory for the protection of the life or physical integrity of the person or another person who is unable to disclose his consent due to actual impossibility or whose consent is not legally valid.

- **Transfer from Public Registers:** Transfer from a registry open to the public or persons with legitimate interests, provided that the conditions required to access the registry in the relevant legislation are met and the person with a legitimate interest requests it.

3.5.3. Domestic Transfer of the Special Categories of Personal Data

Transfer of special categories of personal data is prohibited as a rule. However, Tofaş processes special categories of personal data in accordance with the principles set forth in this Policy and in the existence of the following grounds specified in Article 6 of the Law:

(i) Explicit Consent of the data subject

One of the conditions for processing special categories of personal data is the explicit consent of the data subject. The explicit consent of the data subject must be related to a specific subject, based on information and freely given.

In the presence of the following special categories of personal data processing conditions, personal data may be processed without the explicit consent of the data subject:

(ii) Explicitly Stipulated by Laws

If the special categories of personal data of the data subject are explicitly stipulated in the law, in other words, if there is a clear provision in the relevant law regarding the processing of special categories of personal data, this data processing condition may be mentioned.

(iii) Failure to Obtain Explicit Consent of the Data Subject Due to Physical Disability

The personal data of the data subject may be processed if it is mandatory to process the personal data of the data subject in order to protect the life or physical integrity of the data subject or another person who is unable to disclose his/her consent due to actual impossibility or whose consent cannot be recognized as valid.

(iv) Publicization of Special Categories of Personal Data of the Data Subject

In the event that the data subject has made his/her special categories of personal data public in accordance with his/her own will to make it public, the relevant special categories of personal data may be processed limited to the purpose of making it public.

(v) Data Processing is Mandatory for the Establishment or Protection of a Right

If data processing is mandatory for the establishment, exercise or protection of a right, the special categories of personal data of the data subject may be processed.

(vi) Processing is Necessary within the Scope of Relevant Purposes by Persons Under Secrecy Obligation or Authorized Institutions and Organizations

Special categories of personal data of the data subject may be processed by persons under the obligation of confidentiality or authorized institutions and organizations; if necessary for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, and the planning, management and financing of health services.

(vii) Processing for the Fulfillment of Legal Obligations Regarding Employment, Occupational Health and Safety, Social Security, Social Services and Social Assistance

In the event that it is mandatory to fulfill legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance, the special categories of personal data of the data subject may be processed.

(viii) Processing Regarding Foundations, Associations and Other Non-Profit Organizations or Entities Established for Political, Philosophical, Religious or Trade Union Purposes

Foundations, associations and other non-profit organizations or formations established for political, philosophical, religious or trade union purposes; provided that they comply with the legislation to which they are subject and their purposes, are limited to their fields of activity and are not disclosed to third parties; may process special categories of personal data of the data subject for their current or former members and members or persons who are in regular contact with these organizations and formations.

3.5.4. Transfer of Special Categories of Personal Data to Third Parties Residing Abroad

The transfer of special categories of personal data abroad by our Company will be carried out in accordance with Article 9 of the Law and the principles set out in this Policy by taking technical and administrative measures in the scope described below:

(i) Transfer Based on the Adequacy Decision Made About the Relevant Country, International Organization or Sectors within the Country

Personal data may be transferred abroad by the Company if one of the conditions specified in Articles 5 and 6 of the Law exists and there is an adequacy decision issued by the Board regarding the country, international organization or sectors within the country to which the transfer will be made.

The adequacy decision is issued by the Board and published in the Official Gazette. The Board may also seek the opinion of relevant institutions and organizations if necessary. The adequacy decision is evaluated every four years at the latest. The Board may modify, suspend or revoke the adequacy decision with prospective effect as a result of the assessment or as otherwise deemed necessary.

(ii) Transfer Based on Appropriate Safeguards

In the absence of an adequacy decision, personal data may be transferred abroad by the Company if one of the following appropriate safeguards is provided by the parties, provided that one of the personal data processing conditions specified in Articles 5 and 6 of the Law exists and the data subject has the opportunity to exercise his/her rights and apply for effective legal remedies in the country where the transfer will be made:

- **Special Transfer Reason for Public Institutions and Organizations or Professional Organizations of Public Nature:** Existence of an agreement that is not in the nature of an international agreement between public institutions and organizations or international organizations abroad and public institutions and organizations or professional organizations in the nature of a public institution in Türkiye and the Board's authorization of the transfer.
- **Binding Corporate Rules:** Existence of binding corporate rules approved by the Board and containing provisions on the protection of personal data, which companies within the group of undertakings engaged in joint economic activities are obliged to comply with.
- **Standard Contracts:** Existence of a standard contract announced by the Board, including data categories, purposes of data transfer, recipients and recipient groups, technical and administrative measures to be taken by the data importer, additional measures taken for special categories of personal data, and notifying the Board about this standard contract within the legal periods.
- **Undertaking:** Existence of a written undertaking containing provisions to ensure adequate protection and authorization of the transfer by the Board.

(iii) Transfer Based on Derogations

Personal data may be transferred abroad by the Company in the absence of an adequacy decision and if one of the appropriate safeguards cannot be provided, provided that it is incidental, in the presence of one of the following situations:

- **Informed Special Explicit Consent for Possible Risks:** The explicit consent of the data subject to the transfer, provided that the data subject is informed about the possible risks.
- **Execution of the Contract and Implementation of Pre-Contractual Measures:** The transfer is necessary for the performance of a contract between the data subject and the controller or for the implementation of pre-contractual measures taken upon the request of the data subject.
- **Third Party Contracts for the Benefit of the Data Subject:** The transfer is necessary for the conclusion or performance of a contract between the controller and another natural or legal person for the benefit of the data subject.
- **Necessity for Important Reasons of Public Interest:** The transfer is necessary for an important reason of public interest.
- **Establishment, Exercise or Protection of a Right:** The transfer of personal data is mandatory for the establishment, exercise or protection of a right.
- **Vital Interest:** The transfer of personal data is mandatory for the protection of the life or physical integrity of the person or another person who is unable to disclose his consent due to actual impossibility or whose consent is not legally valid.
- **Transfer from Public Registers:** Transfer from a registry open to the public or persons with legitimate interests, provided that the conditions required to access the registry in the relevant legislation are met and the person with a legitimate interest requests it.

PART 4 CATEGORIZATION OF THE PERSONAL DATA PROCESSED BY OUR COMPANY AND PURPOSES OF PROCESSING

Personal data are processed by our Company by informing the data subjects in accordance with Article 10 of the Law and secondary legislation, in line with the personal data processing purposes of our Company, based on and limited to at least one of the Data Processing Conditions stipulated in Articles 5 and 6 of the Law, in accordance with the general principles stipulated in the Law, especially the principles stipulated in Article 4 of the Law regarding the processing of personal data. Within the framework of the purposes and conditions specified in this Policy, the categories of personal data processed and detailed information about the categories can be found in Annex 3 ("*Annex 3- Personal Data Categories*") of the Policy.

Detailed information on the personal data processing purposes in question is included in Annex 1 of the Policy ("*Annex 1- Personal Data Processing Purposes*").

PART 5 RETENTION AND DISPOSAL OF PERSONAL DATA

Our Company retains personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the legal legislation. Our Company first determines whether a period of time is stipulated for the retention of personal data in the relevant legislation, and if a period is determined, it acts in accordance with this period. If there is no legal period, personal data are retained for the period required for the purpose for which they are processed.

The personal data processed by our Company are handled on a categorical basis and maximum data retention periods have been determined for each category of personal data. These periods are set out in the table in our Company's Personal Data Retention and Disposal Policy. Personal data are disposed of at the end of the specified maximum retention periods in accordance with the periodic disposal periods or in accordance with the application of the data subject and with the specified disposal methods (deletion and/or destruction and/or anonymization).

PART 6 RIGHTS OF DATA SUBAJECTS AND EXERCISE OF THEIR RIGHTS

6.1. RIGHTS OF THE DATA SUBJECTS

Data subjects are entitled to following rights below:

- (1) Learning whether personal data have been processed,
- (2) Requesting information if personal data have been processed,
- (3) Learning the purpose of the processing of personal data and whether they have been used accordingly,
- (4) Learning which third parties domestic or abroad the personal data has been transferred to,
- (5) Requesting rectification in case personal data has been processed incompletely or inaccurately and notification of the operations made within this scope to third parties to whom the personal data has been transferred,
- (6) Requesting the erasure or destruction of personal data in case the reasons requiring its processing have been fulfilled, although it has been processed in accordance with the Law and other relevant provisions and the notification to third parties whom the personal data has been transferred to
- (7) Objecting to negative consequences that are concluded, as a result of analysis of the processed personal data through solely automatic systems,
- (8) Demanding compensation for the damages that has been suffered as a result of unlawful processing of the personal data.

6.2. EXERCISE OF THE DATA SUBJECTS' RIGHTS

Data subjects may submit their requests regarding their rights mentioned in the Part 6.1 ("*Rights of Data Subjects*") to our Company through the means specified by the Board. Accordingly, they shall be able to benefit from the "Data Subject Application Form" available at the web address <https://www.tofas.com.tr/en/ProtectionofPersonalData>

6.3. OUR COMPANIES' RESPONSE TO THE REQUESTS

Our Company takes the necessary administrative and technical measures to finalize the applications to be made by the data subject in accordance with the Law and secondary legislation.

In case the data subject submits its request regarding the rights in part 6.1. ("*Rights of the Data Subject*") to our Company in accordance with the procedure, our Company will conclude the relevant request free of charge and as soon as possible and within 30 (thirty) days at the latest, depending on the nature of the request. However, if the process requires an additional cost, a fee may be charged in accordance with the tariff determined by the Board.

ANNEX-1 – Personal Data Processing Purposes

MAIN PURPOSES (PRIMARY)	AUXILLIARY PURPOSES (SECONDARY)
<p>Carrying Out the Necessary Operations by Our Relevant Business Units For The Conduction Of The Commercial Activities Carried Out By The Company And The Execution Of The Related Business Processes</p>	Activity management
	Planning and execution of business activities
	Planning and execution of corporate communication activities
	Planning and execution of supply chain management processes
	Planning and execution of production and operation processes
	Planning, auditing, and execution of information security processes
	Establishment and management of information technology infrastructure
	Planning and execution of authorizations of business partners and suppliers to access information
	Follow-up of finance and accounting activities
	Planning and execution of corporate sustainability activities
	Planning and execution of activities for conducting effectiveness/efficiency and relevance analysis of business activities
	Planning and execution of corporate governance activities
	Planning and execution of business continuity activities
	Planning and execution of logistics activities
Planning and execution of transportation activities	
Planning and execution of sponsorship activities	
<p>Planning and Execution of the Company's Commercial and/or Business Strategies</p>	Planning and execution of external training activities
	Management of relationships with business partners and suppliers
	Execution of strategic planning activities
	Planning and execution of reporting activities
<p>Carrying Out the Necessary Work by Our Business Units to Ensure That The Data Subjects Benefit From The Products And Services Offered By The Company And Executing The Relevant Business Processes</p>	Planning and execution of sales processes of products and services
	Planning and execution of after-sales support services activities
	Planning and execution of customer relationship management processes
	Follow-up of contract processes and legal requests
	Creation and follow-up of the customer's insurance process
	Follow-up of customer requests and complaints

<p>Planning and Execution of the Activities Necessary for Customization of the Products and Services Offered by the Company According to the Likes, Usage Habits and Needs of the Data Subjects and Recommendation to the Data Subjects and Promotion of the Company</p>	<p>Planning and execution of market research activities for sales and marketing of products and services</p>
	<p>Planning and execution of the processes of creating and increasing loyalty to the products and services offered by the Company</p>
	<p>Planning and execution of marketing processes of products and services</p>
	<p>Planning and execution of customer satisfaction activities</p>
	<p>Identification and evaluation of people to be subject to marketing activities in line with consumer behavior criteria</p>
	<p>Design and execution of customized marketing and promotional activities</p>
	<p>Design and execution of advertising, promotion and marketing activities in digital and other media</p>
	<p>Design and execution of activities to be developed on customer acquisition and value creation for existing customers in digital and other channels</p>
	<p>Planning and execution of data analytics efforts for marketing purposes</p>
	<p>Organizing contests/sweepstakes for marketing activities and ensuring customer satisfaction</p>
	<p>Planning and execution of activities to improve and develop the user experience for products and services</p>
<p>Ensuring Legal, Technical and Commercial-Business Security of the Company and Related Persons in Business Relations with the Company</p>	<p>Follow-up of legal affairs</p>
	<p>Planning and execution of the necessary operational activities to ensure that the Company's activities are carried out in accordance with company procedures and relevant legislation</p>
	<p>Providing information to authorized institutions due to legislation</p>
	<p>Creation and tracking of visitor records</p>
	<p>Planning and execution of emergency management processes</p>
	<p>Conduction of company and partnership law transactions</p>
	<p>Planning and execution of Company audit activities</p>
	<p>Planning and execution of internal audit and investigation processes</p>
	<p>Ensuring that data is accurate and up-to-date</p>
	<p>Management and supervision of relations with affiliates</p>
	<p>Planning and execution of occupational health and safety processes</p>
<p>Ensuring the security of company premises and facilities</p>	

	Ensuring the security of company operations
	Planning and execution of the Company's financial risk processes
	Planning and execution of claims management processes
	Planning and execution of the Company's production and operational risk processes
	Ensuring the security of company fixtures and resources
	Planning and execution of compliance processes as required by foreign legislation
Realization of Operational Processes for the Design and Execution of Social Responsibility and Non-Governmental Activities Carried Out by the Company by the Relevant Business Units	Planning and execution of social responsibility and non-government activities
Planning and Execution of the Company's Human Resources Policies and Processes	Planning and execution of internal orientation activities
	Planning human resources processes
	Execution of personnel recruitment processes
	Planning and execution of internal training activities
	Planning and execution of intern and student recruitment, placement and operation processes
	Planning and execution of human resources needs for production

ANNEX 2 – Data Subjects

DATA SUBJECT CATEGORY	EXPLANATION
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
Potential Customer	Natural persons who have made a request or interest in using our products and services or who have been evaluated in accordance with the rules of commercial practice and honesty that they may have this interest
Visitor	Natural persons who have entered the physical premises owned by our Company for various purposes or who visit our websites
Third Party	Third party natural persons (e.g. guarantors, family members and relatives) who are related to these persons in order to ensure the security of our company's commercial transactions with the aforementioned parties or to protect the rights of the aforementioned persons and to obtain benefits, or other natural persons who are not covered by this Policy and Tofaş Türk Otomobil Fabrikası Anonim Şirketi Employees Personal Data Protection and Processing Policy
Employee Candidate	Real persons (including internship candidates) who have applied for a job to our company by any means or who have opened their CV and related information to our company's review
Company Shareholder	Natural persons who are shareholders of our Company
Company Representative	Members of the Board of Directors and other authorized natural persons
Supplier Employee/ Authorized Person	Natural persons who are officers or shareholders of the employees of the party providing services on a contractual basis in accordance with the orders and instructions of our Company while conducting our Company's commercial activities
Subcontractor Employee/Authorized Person	Natural persons, including employees, shareholders and officials of companies with which our Company has a subcontractor relationship
Partnership Employee/ Authorized Person	Natural persons working in organizations with which our Company has all kinds of business relations, including the shareholders and officials of these organizations

ANNEX 3- Personal Data Categories

PERSONAL DATA CATEGORIES	EXPLANATION
Identity Information	Data containing information about the identity of the person: documents such as driver's license, identity card and passport containing information such as name-surname, Turkish ID number, nationality, mother's name-father's name, place of birth, date of birth, gender, and information such as tax number, SSI number, vehicle license plate, etc.
Contact Information	Phone number, address, email, fax number
Location Data	Information that determines the location of the data subject during the use of our products and services or the location of the employees of the organizations we cooperate with our employees while using our Company's vehicles
Customer Information	Information obtained and produced about the data subject as a result of our commercial activities and the operations carried out by our business units within this framework
Family Member and Relative Information	Information about the family members and relatives of the data subject within the framework of our Company's operations and in relation to the products and services we offer or in order to protect the legal and other interests of the Company and the data subject
Customer Transaction Information	Information that clearly belongs to an identified or identifiable natural person and is included in the data recording system, such as records for the use of our products and services and the instructions and requests of the customer required for the use of products and services
Physical Space Security Information	Personal data related to the records and documents taken at the entrance to the physical space, during the stay in the physical space, which clearly belong to an identified or identifiable natural person and are included in the data recording system; camera records, fingerprint records and records taken at the security point, etc.
Transaction Security Information	Your personal data processed to ensure our technical, administrative, legal and commercial security while conducting our commercial activities (e.g., log records)
Risk Management Information	Personal data processed by means of methods used by generally accepted legal, commercial customs, and honesty rules in these areas for us to manage our commercial, technical, and administrative risks
Financial Information	Personal data that clearly belongs to an identified or identifiable natural person, processed partially

	or completely automatically or non-automatically as part of the data recording system; personal data processed regarding information, documents and records showing all kinds of financial results created according to the type of legal relationship established by our company with the data subject and data such as bank account number, IBAN, credit card information, financial profile, asset data, income information
Personnel Information	All kinds of personal data processed for obtaining information that will be the basis for the formation of the personal rights of natural persons who are in a working relationship with our company
Employee Candidate Information	Personal data processed regarding individuals who have applied to become an employee of our company or who have been evaluated as employee candidates in line with the human resources needs of our company in accordance with the commercial custom and honesty rules or who are in a working relationship with our Company
Special Categories of Personal Data	Data relating to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data
Marketing Information	Personal data processed for the marketing of our products and services by customizing them in line with the usage habits, tastes and needs of the data subject, and the reports and evaluations created as a result of these processing results
Request/Complaint Management Information	Personal data regarding the receipt and evaluation of any request or complaint addressed to our Company
Audio Visual Data	Data in the form of photographs and camera recordings (except for recordings within the scope of Physical Space Security Information), voice recordings and copies of documents containing personal data, which clearly belong to an identified or identifiable natural person
Audit and Supervision Information	It means personal data processed during internal or external audit activities within the scope of our company's legal obligations and compliance with company policies.
Legal Process and Compliance Information	Personal data processed within the scope of determination and follow-up of our legal receivables and rights and performance of our debts and compliance with our legal obligations and our Company's policies

ANNEX 4 – Third Persons Whom Personal Data are Transferred and the Purposes for the Transfers

In accordance with the articles 8 and 9 of the Law, our Company may transfer the personal data of the data subjects to the following categories of persons:

- (i) Business partners,
- (ii) Suppliers,
- (iii) Subsidiaries,
- (iv) Shareholders,
- (v) Legally authorized private legal persons,
- (vi) Legally authorized public institutions and organizations,
- (vii) Members of the Board of Directors of Koç Group Companies

The scope of the above-mentioned persons to whom the transfer is made, and the data transfer purposes are stated below.

Persons Whom Data Transfer Can Be Made	Definition	Purpose of Data Transfer
Business Solution Partner /	<ul style="list-style-type: none"> • Vendors that we cooperate with to sell our Company's products or services in a certain region and to perform other transactions (You can reach our Company's vendors from the list below) https://tofas.com.tr/Surdurulebilirlik/BayiVeTedarikci/Pages/default.aspx • For the performance of fiscal and financial transactions <ul style="list-style-type: none"> - Akbank T.A.S. - Albaraka Türk Katılım Bankası A.Ş. - Alternatifbank Anonim Şirketi - Bnp Paribas Finansal Kiralama A.Ş. - Bank Of America Yatırım Bank A.Ş. - Burgan Bank A.Ş. - Cıttbank A.Ş. - Denizbank A.Ş. - Türkiye Emlak Katılım Bankası A.Ş. - The European Investment Bank - European Bank for Reconstruction And. Development - Türkiye İhracat Kredi Bankası A.Ş. (Eximbank) - Qnb Finansbank A.Ş. - T. Garanti Bankası A.S. - Hsbc Bank Anonim Şirketi - Türkiye Halk Bankası A.Ş. - Gsd Yatırım Bankası Anonim Şirketi - Ing Bank A.Ş. - Türkiye İş Bankası A.Ş. - Jpmorgan Chase Bank N.A. - Societe Generale Corporate & Investment Banking - Türk Ekonomi Bankası A.Ş. - Türkiye Vakıflar Bankası Türk Anonim Ortaklığı - Vakıf Katılım Bankası A.Ş. - Türkiye Cumhuriyeti Ziraat Bankası Anonim Şirketi 	Limited to ensure the fulfillment of the purposes for which the business partnership was established

	<ul style="list-style-type: none"> - Ziraat Katılım Bankası A.Ş. • Setur Servis Turistik A.Ş. for travel planning services for business trips and organizations • HAY Group Danışmanlık Ltd. Şti, a consultancy firm based abroad, for personality inventory and English tests within the scope of evaluation of job applications • ELBA HR İnsan Kaynakları Eğitim ve Danışmanlık A.Ş. (Peoplise), the provider of the cloud-based software service used for recruitment activities • Aksigorta A.Ş., which provides insurance services within the scope of Connect Car application. • To the following business partners from whom services are provided in order to convey the needs, expectations and tastes of customers and users and to improve product experiences <ul style="list-style-type: none"> - Nanobiz Teknoloji A.Ş. - I-Am Tasarım Ve Danışmanlık A.Ş. - Sestek Ses Ve İletişim Bilgisayar Teknolojileri San. Tic. A.Ş. - Ipsos Araştırma Ve Danışmanlık Hizmetleri A.Ş. - Estima Araştırma Danışmanlık Ve Tic. A.Ş. - Habitus Araştırma Ve Danışmanlık Ltd. Şti. - Parlak Gelecek Araştırma Ve Stratejik Danış Hizm Ltd. Şti - Kırmızı Kalem İletişim Tasarımı San. Ve Tic. Ltd. Şti. - Keytorc Teknoloji Hizmetleri Ve Danışmanlık A.Ş - Sia Araştırma Danışmanlık Ve Eğitim Ltd. Şti. - Etkilab Ar-Ge, Kullanıcı Araştırmaları Dan. Ve Tas. A.Ş. - AC NIELSEN ARAŞTIRMA HİZMET. A.Ş. - Curriocity Araştırma Ve Danışman Hizmetleri A.Ş. - Fram Araştırma, Danışmanlık Ve Eğitim Hizmetleri Tic. Ltd. Şt - Kantar Insights Pazar Araştırmaları Dan. Ve Tic.A.Ş. - Tn Nöro Pazar Araştırmaları A.Ş. - Twentify Teknoloji Ve Kitle Kaynak Hizm. A.Ş. 	
Supplier	Parties providing services to our Company in line with the data processing purposes and instructions of our Company within the scope of the execution of our Company's commercial activities	Limited to the purpose of ensuring the obtaining of services outsourced by our Company and necessary to fulfill its commercial activities
Our Shareholders	Koç Holding Anonim Şirketi, FCA Italy S.p.A. and Stellantis N.V., which are authorized to design the strategies and audit activities regarding the commercial activities of our Company in accordance with the provisions of the relevant legislation.	In accordance with the provisions of the relevant legislation,

		limited to the design of strategies regarding the commercial activities of our Company and for audit purposes
Subsidiaries	The companies listed below, in which our Company has shareholding and controlling interest https://www.tofas.com.tr/en/AboutTofas/Subsidiaries	Limited to ensuring the execution of our Company's commercial activities that require the participation of subsidiaries
Legally Authorized Public Institutions and Organizations,	Public institutions and organizations authorized to receive information and documents from our Company in accordance with the provisions of the relevant legislation, such as; Ministries, Tax offices, Courts, Trade Registry	Limited to the purpose requested by the legal authority of the relevant public institutions and organizations
Legally Authorized Private Legal Persons	Institutions or organizations (e.g. independent auditors, notaries) that are established in accordance with certain conditions set by law in accordance with the provisions of the relevant legislation and continue their activities within the framework determined by law.	Personal data are shared in a limited manner in relation to the subjects that fall within the scope of the activities carried out by the relevant private institutions and organizations.
Koç Holding A.Ş.	Koç Holding A.Ş.	Limited to ensuring the execution of corporate communication, strategic planning, commercial and audit activities that require the participation of Koç Group Companies.

Koç Group Companies	(You can reach Koç Group Companies from the list at https://www.koc.com.tr/activity-fields/companies)	In case of explicit consent of the person concerned, limited to the purpose of evaluation in other Koç Group Companies during recruitment processes
Members of the Company's Board of Directors	Members of the Company's Board of Directors	Limited to the purpose of carrying out the activities of the Company's Board of Directors