



TOFAŞ TÜRK OTOMOBİL FABRİKASI A.Ş. POLICY ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

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1. INTRODUCTION

1.1. INTRODUCTION TO POLICY

Protection of personal data is of importance for our Company TOFAŞ Türk Otomobil Fabrikası A.Ş. (“TOFAŞ” or “Company”) and is among our Company’s most important priorities. The most important pillar of this subject however is the protection and processing of data belonging to our Customers, Potential Customers, Company Shareholders, Representatives, our Visitors; Employees, Shareholders and Representatives of institutions we are in cooperation with and Third Persons, such protection and processing of which is regulated by this Policy. Activities undertaken by our Company regarding the protection of our employees’ personal data are managed by the Policy on Protection and Processing of Personal Data of TOFAŞ Employees prepared in line with the principles of this Policy.

According to the Turkish Constitution, everyone has the right to request the protection of their personal data. Concerning the protection of personal data being a Constitutional right, TOFAŞ shows great effort for the protection of personal data belonging to customers, potential customers, candidate employees, company shareholders, company officials, visitors, employees, shareholders and officials of institutions we are in cooperation with, such protection and processing being managed by this Policy and implements such protection and processing of aforementioned data as a Company policy.

Within this scope, necessary administrative and technical measures are taken by TOFAŞ for the protection of personal data processed in accordance with the relevant legislation.

Within this Policy detailed explanations shall be provided concerning basic principles TOFAŞ has adopted for the processing of personal data and listed below:

- Processing of personal data in accordance with laws and in good faith,
- Personal data are accurate and up to date when necessary,
- Processing personal data for specified, clear and legitimate purposes,
- Processing personal data in connection with purposes for which they are processed with restrictions and purposes,
- Retaining personal data for terms foreseen by relevant legislation or for purposes they are processed for,
- Notifying and informing data subjects,
- Establishing the required system for the exercising of data subjects’ rights,
- Taking necessary measures for the protection of personal data,



- Acting in compliance with relevant legislation and regulations of the Board when transferring personal data to third parties in line with requirements of processing such personal data,
- Showing required sensitivity for the processing and protection of special categories of personal data.

1.2. THE PURPOSE OF POLICY

The main purpose of this Policy is to provide explanations regarding systems adopted for the protection of personal data and personal data processing activities undertaken by TOFAŞ in accordance with the law; to ensure transparency by informing people the personal data of whom are processed, such people foremost being our customers, our potential customers, our candidate employees, our company shareholders, our company officials, the employees, shareholder and officials of institutions we are in cooperation with and third parties.

1.3. SCOPE

This Policy concerns all personal data belonging to our Customers, Potential Customers, Company Shareholders, Representatives, our Visitors; Employees, Shareholders and Representatives of institutions we are in cooperation with and Third Persons such data being processed by automatic means or by non-automatic means provided that they are a part of the data recording system.

This Policy may be applied to personal data subjects under the above mentioned categories entirely or in part (for example Third Parties being our Visitors at the same time) but also partial provisions thereof (for example such as our Visitors Only).

1.4. THE IMPLEMENTATION OF POLICY AND RELEVANT LEGISLATION

Relevant legal regulations in force concerning the processing and protection of personal data shall primarily be applied. In case there is a conflict between the legislation in force and this Policy, our Company accepts that the legislation in force shall be applied.

The Policy is comprised of rules set forth under the relevant legislation by embodying such rules within scope of TOFAŞ applications. Our Company continues the preparations for the required system and for acting in compliance with implementation periods foreseen by Law no. 6698 no. (See. Annex-3)



1.5. EXECUTION OF POLICY

This Policy has been executed on 07/10/2016 In the event the entire Policy or specific provisions thereof are renewed the execution date of the Policy shall be updated. The Policy is published on our Company's web site (www.tofas.com.tr) and are also forwarded to data subjects upon their request.

2. MATTERS CONCERNING THE PROTECTION OF PERSONAL DATA

Our Company, in compliance with Article 12 of the Law no. 6698, takes necessary technical and administrative measures for preventing unlawful access to data that are being processed and ensuring the appropriate level of security for the retainment of data and in this regard, conducts necessary controls or have them conducted.

2.1. ENSURING SECURITY OF PERSONAL DATA

2.1.1. Technical and Administrative Measures Taken to Ensure the Lawful Processing of Personal Data

Technical and administrative measures are taken for ensuring the lawful processing of personal data according to technological conditions and and implementation costs.

(i) Technical Measures Taken for Ensuring Lawful Processing of Personal Data

Main technical measures taken by our Company for ensuring that personal data are processed lawfully are listed below:

- Personal data processing activities realized within our Company are controlled by established technical systems.
- Technical measures taken are periodically reported to the concerned as per requirements of internal control mechanism.
- Personnel trained on technical matters are employed.

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

Main administrative measures taken by our Company for ensuring that personal data are processed lawfully are listed below:

- Employees are informed and trained regarding the of protecting personal data and lawful processing of personal data.
- All activities pursued by our Company are detailly analyzed in specific to all departments, personal data processing activites are set forth specific to the commercial activites realized by the relevant business units.
- Personal data processing activities carried out by our business units are set forth specific to the detailed activity carried out by such business unit with respect to the



requirements to be met in order to ensure that such activities are in compliance with the Law no. 6698.

- In order to comply with the legal requirements determined based on our business units, awareness is raised specific to relevant business units and implementation rules are determined; necessary administrative measures are implemented by way of in house policies and trainings in order to ensure the supervision of these matters and the sustainability of implementation.
- Contracts and documents regulating the legal relation between our Company and employees, apart from exceptions introduced by Company instructions and law, are subject to obligations not to process, disclose and use personal data and employees' awareness are raised in this respect and controls are conducted.

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

In order to prevent the unauthorized or neglected disclosure of, access to and transfer of or any and all other unauthorized access to personal data, our Company takes technical and administrative measures according to the nature of the data to be protected, technological conditions and application costs.

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

Main technical measures taken by our Company to prevent unlawful access to personal data are listed below:

- Technical measures in accordance with technological developments, are taken and such measures are periodically updated and renewed.
- Access and authorization technical solutions are taken into action in accordance with legal compliance determined as based on business units,
- Technical precautions taken are periodically reported to concerned as per requirements of internal control mechanism and matters which pose a risk are reevaluated and necessary technological solutions are produced.
- Virus protection systems and security wall software and hardware are installed.
- Personnel trained on technical matters are employed.

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

Main administrative measures taken by our Company to prevent unlawful access to personal data are listed below:

- Employees are trained regarding the technical measures for preventing unlawful access to personal data.
- Access to personal data and authorization processes are designed and applied within Company structure in accordance with legal compliance requirements based on business units



- Employees are informed that they cannot disclose personal data they learn against the provisions of the Law no. 6698 and use such data for purposes other than such purposes they were processed for and that his aforementioned obligations shall remain after they leave office; moreover necessary undertakings are obtained from them in line therewith.
- Provisions ensuring that necessary security measures for the protection of personal data are taken by the persons to whom personal data is transferred and that they shall ensure compliance with such measures within their institutions are included into the contracts concluded with persons to whom personal data are lawfully transferred.

2.1.3. The Retainment of Personal Data in Secured Environments

Our Company takes necessary technical and administrative measures in accordance with technological conditions and application costs in order to ensure the secure retainment of personal data, prevent the loss, alteration or unlawful destruction.

(i) Technical Measures Taken for Retaining Personal Data in Secured Environments

Technical measures taken by our Company for the protection of personal data in secured environments are listed below:

- Systems appropriate for technological developments are used for retaining personal data in secured environments,
- Expert personnel are employed on technical matters.
- Technical security systems for retainment areas are established, technical precautions that are taken are periodically reported to the concerned as per internal control mechanism, matters posing a risk are reevaluated and necessary technological solutions are produced.
- Appropriate backup programs are used in order to ensure that personal data are retained securely.

(ii) Administrative Measures Taken for Retaining Personal Data in Secured Environments

Main administrative measures taken by our Company for retaining personal data in secured environments are listed below:

- Employees are trained on the secure retainment of personal data.
- In the event that our Company outsources services due to technical requirements on the retainment of personal data, provisions ensuring that necessary security measures for the protection of personal data are taken by the persons to whom personal data is transferred and that they shall ensure compliance with such measures within their institutions are included into the contracts concluded with firms to which personal data are lawfully transferred.



2.1.4. Auditing the Measures Taken for the Protection of Personal Data

Our Company, in accordance with Article 12 of Law no. 6698, undertakes audits or have them undertaken. Results of such audit are reported to the relevant department within the scope of Company's internal functioning, while necessary activities for the improvement of measures are taken.

2.1.5. Measures Taken in the Event of Unauthorized Disclosure of Personal Data

Our Company operates a system which ensures that the data subject and the Board is notified as soon as possible in the event that personal data which are processed in accordance with Article 12 of the Law no. 6698 were obtained unlawfully by third parties.

In case it is deemed necessary by the Board, this may be announced on the web site of the Board or by other means.

2.2. RESPECTING THE RIGHTS OF DATA SUBJECTS; CREATING MEANS FOR THE REFERRAL OF SUCH RIGHTS TO OUR COMPANY AND THE EVALUATION OF DATA SUBJECTS' REQUESTS

In order to evaluate the rights of data subjects and providing necessary information to data subjects our Company conducts, in compliance with Article 13 of the Law no. 6698, necessary means, internal operation, administrative and technical regulations.

In case data subjects forward their requests concerning the rights listed below to our Company in writing, our Company shall conclude the relevant request according to the nature of the request as soon as possible and within thirty days at the latest, free of charge. If data subjects' request requires an additional cost, our Company shall charge a fee based on the tariff specified by the Board. Data subjects are entitled to the following rights:

- Learn whether or not data relating to him/her are being processed;
- Request further information if personal data relating to him have been processed;
- Learn the purpose of the processing of personal data and whether or not data are being processed in compliance with such purpose;
- Learn the third party recipients to whom the data are disclosed within the country or abroad,
- Request rectification of the processed personal data which is incomplete or inaccurate and request such process to be notified to third persons to whom personal data is transferred.
- Request erasure or destruction of data in the event that the data is no longer necessary in relation to the purpose for which the personal data was collected, despite being processed in line with the Law no. 6698 and other applicable laws and request such process to be notified to third persons to whom personal data is transferred.
- Object to negative consequences about him/her that are concluded as a result of analysis of the processed personal data by solely automatic means,



- Demand compensation for the damages he/she has suffered as a result of an unlawful processing operation.

Detailed information on the rights of data subjects is provided under Section 10 of this Policy.

2.3. PROTECTION OF SPECIAL CATEGORIES OF PERSONAL DATA

The Law no. 6698 emphasizes significance on special categories of personal data since unlawful processing of such data may cause the data subject to suffer or be discriminated. Such data are; race, ethnicity, political views, philosophical beliefs, religion, sect or other beliefs, clothes and attire, association, foundation or trade union membership, data relating to health and sexual life, criminal convictions and security measures, biometric and genetic data.

Our Company acts with prudence on the protection of personal data deemed as “special category” as per the Law no. 6698 and such data being processed in accordance with law. Within this scope, technical and administrative measures taken by our Company for the protection of personal data are applied elaborately with respect to special categories of personal data and necessary audits are conducted within TOFAŞ. Detailed information regarding the processing of special categories of personal data is provided under Section 3 of this Policy.

2.4. RAISING AWARENESS OF BUSINESS UNITS ON THE PROTECTION AND PROCESSING OF PERSONAL DATA AND THEIR SUPERVISION

Our Company provides necessary training to business units for preventing unlawful processing of personal data and unlawful access to personal data and raising awareness for ensuring the retention of such data.

Necessary training systems on protection of personal data for raising awareness among TOFAŞ’s current employees and employees who are newly introduced to the business unit, if it is needed for the topic, professionals are consulted.

Training results for increasing awareness of business units on the protection and processing of personal data are reported to our Company. . In this regard our Company evaluates the attendance to relevant trainings, seminars and information sessions, conducts necessary audits or haves such audits be conducted. In line with the amendments of the relevant legislation, our Company updates and renews its training programs.



2.5. RAISING AWARENESS OF BUSINESS PARTNERS AND SUPPLIERS ON THE PROTECTION AND PROCESSING OF PERSONAL DATA AND THEIR SUPERVISION

Our Company regularly organizes training and seminars for its business partners and suppliers for raising awareness in order to prevent the unlawful processing of personal data, preventing the unauthorized access to data and ensuring the retention of data.

Trainings for business partners and suppliers are repeated periodically, necessary training systems on protection of personal data for raising awareness among the current employees and employees who are newly introduced to the business unit of business partners and suppliers, if it is needed for the topic, professionals are consulted.

Training results for increasing awareness of our Company's business partners and suppliers on the protection and processing of personal data are reported to our Company. In this regard our Company evaluates the attendance to relevant trainings, seminars and information sessions, conducts necessary audits or have such audits be conducted. In line with the amendments of the relevant legislation, our Company updates and renews its training programs

3. MATTERS CONCERNING THE PROCESSING OF PERSONAL DATA

In accordance with Article 20 of the Constitution and Article 4 of the Law no. 6698, our Company carries out personal data processing activities lawfully and in good faith; and ensures that processed personal data are accurate and up-to-date, by pursuing specific, explicit and legitimate purposes, relevant, limited and proportional to the purposes of processing. Our Company retains personal data for as long as foreseen by relevant laws or necessary for the purposes of processing of personal data.

As per requirements of Article 20 of the Constitution and Article 5 of the Law no. 6698, our Company processes personal data based on one or more of the conditions set forth under Article 5 of the Law no. 6698 concerning the processing of personal data.

In accordance with Article 10 of the Law no. 6698 and Article 20 of the Constitution our Company informs data subjects and provides the necessary information in case requested by data subjects.

Our Company complies with the regulations set forth under Article 6 of the Law no. 6698 with respect to the processing of special categories of personal data.

Pursuant to Articles 8 and 9 of the Law no. 6698, our Company complies with the regulations set forth by the Law no. 6698 or by the Board relating to the transfer of personal data.



3.1 THE PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH THE PRINCIPLES FORESEEN BY THE LEGISLATION

3.1.1. Processing in Good Faith and in Accordance with the Law

Personal data are processed by our Company in accordance with the principles set forth under legal regulations and general confidence rules and in good faith. In this regard, personal data are processed limited with and in proportion to the purpose of processing.

3.1.2. Ensuring that Personal Data Are Accurate and Up-to-Date When Necessary

By taking employees' fundamental rights and our Company's legitimate interests into consideration, regular controlling updates are made in order to ensure that processed personal data are accurate and up-to-date and necessary measures are taken in this regard. For example; TOFAŞ has established a system for data subjects to correct their personal data and verify their accuracy. Detailed information regarding this subject is provided under Section 10 of this Policy.

3.1.3. Processing for Specific, Explicit and Legitimate Purposes

Our Company determines lawful and legitimate purpose of personal data processing expressly and definitely. Our Company processes personal data in connection with the goods and services it provides and to the extent that is necessary for them. Purposes of processing of personal data are set forth prior to processing activity.

3.1.4. Relevant, Limited and Proportional to the Purposes for Which They Are Processed

Personal data are processed for the realization of the specified purposes and processing of personal data that is irrelevant to the realization of the purpose or that are not required for the purpose of processing is prevented. For example, personal data processing activity for meeting the needs that may arise in the future is not carried out.

3.1.5. Retaining for a Duration Necessary for the Purposes for Which the Data Are Processed or a Duration Foreseen Under the Relevant Legislation

Company keeps personal data only for a duration stated under the applicable legislation or necessary for the purposes for which the data are processed. In this regard, first it is determined that whether a duration is foreseen under the relevant legislation and if so such duration is complied with, if not, personal data are kept for the duration necessary for the purposes for which data are processed. In the event that the duration is expired or the data is no longer necessary in relation to the purpose for which the personal data was collected, personal data are erased, destroyed or anonymized. Personal data is not stored by our Company based on the possibility of future use. Detailed information regarding this subject is provided under Section 9 of this Policy.



3.2 THE PROCESSING OF PERSONAL DATA BASED ON AND LIMITED TO ONE OR MORE OF THE CONDITIONS REGARDING THE PROCESSING OF PERSONAL DATA STATED UNDER ARTICLE 5 OF THE LAW NO. 6698

Protection of personal data is a constitutional right. Fundamental rights and freedoms may only be limited by law and for reasons stated in the related provisions of the Constitution, save that their essence is protected. Pursuant to Article 20(3) of the Constitution, personal data shall only be processed under the circumstances foreseen by law or based on data subject's explicit consent. Our Company, in line with the Constitution, processes personal data only under circumstances foreseen by

Law no. 6698 or where explicit consent of the data subject is provided. Detailed information regarding this subject is provided under Section 7 of this Policy.

3.3 INFORMING AND NOTIFYING THE DATA SUBJECT

In accordance with Article 10 of the Law no. 6698, our Company informs data subjects during the collection of personal data. Within this scope, TOFAŞ provides the information on the company and on its representative, if any, the purpose of the personal data processing for which the data are intended, the recipients to whom the personal data will be transferred, and purposes of such transfer, the method and legal grounds of the personal data collection and rights of the data subjects.

Detailed information regarding this subject is provided under Section 10 of this Policy.

Article 20 of the Constitution states that everyone has a right to obtain information on his personal data. Accordingly, Article 11 of the Law no. 6698 considers 'request of information' as one of the rights entitled to the data subject. In case data subjects request information regarding their personal data in accordance with Article 20 of the Constitution and Article 11 of the Law no. 6698, the Company will provide the necessary information.

Detailed information regarding this matter is provided under Section 10 of this Policy.

3.4 THE PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA

When processing personal data which is deemed as "special category" as per the Law no. 6698 our Company carefully complies with the regulations provided under the Law no. 6698.

According to article 6 of the Law no. 6698 certain personal data are qualified as "special categories of personal data" due to the reason that their unlawful processing may cause the data subject to suffer or be discriminated. Such data are; race, ethnicity, political views, philosophical beliefs, religion, sect



or other beliefs, clothes and attire, association, foundation or trade union membership, data relating to health and sexual life, criminal convictions and security measures, biometric and genetic data.

Special categories of personal data may be processed by our Company under the below mentioned circumstances in accordance with the Law no. 6698 and provided that necessary measures specified by the Board are taken:

- If the data subject has explicitly consented or
- If the data subject has not explicitly consented;
 - Special categories of personal data other than data relating to health and sex life of the data subject are processed where it is specifically envisaged under the laws,
 - Special categories of personal data relating to the health and sex life of the data subject may be processed by persons under the obligation of confidentiality or authorized institutions and organizations only for the purposes of protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

3.5 THE TRANSFER OF PERSONAL DATA

By taking necessary security measures in line with the lawful purposes of processing (See Section II/ Title 2.1) our Company may transfer data subjects' personal data and special categories of personal data to third persons (See Section 6). In this regard, our Company complies with the regulations provided under Article 8 of the Law no. 6698. Detailed information regarding this subject is provided under Section 6 of this Policy.

3.5.1 Transfer of Personal Data

In line with legitimate and lawful personal data processing purposes, our Company may transfer personal data to third parties based on and limited to one or more of the personal data processing conditions stated under Article 5 of the Law no. 6698 which are listed below:

- if data subject has explicitly consented,
- if it is expressly permitted by any law,
- if it is necessary in order to protect the life or physical integrity of the data subject or a third party where the data subject is physically or legally incapable of giving consent,
- if it is necessary to process the personal data of parties of a contract, provided that the processing is directly related to the execution or performance of the contract,
- if it is necessary for compliance with a legal obligation which TOFAŞ is subject to,
- if the relevant information is revealed to the public by the data subject himself,
- if it is necessary for the institution, usage, or protection of a right,



- It is necessary for the legitimate interests of our Company, provided that the fundamental rights and freedoms of the data subject are protected.

3.5.2 Transfer of Special Categories of Personal Data

By acting carefully, and taking the necessary security measures (see Section 2/ Title 2.1.) and taking adequate measures foreseen by the Board, our Company, in line with legitimate and lawful purposes, may transfer data subjects' special categories of personal data to third parties only under circumstances listed below:

- If the data subject has explicitly consented or
- If the data subject has not explicitly consented;
 - Special categories of personal data other than data relating to health and sex life of the data subject (*Data relating to an individual's racial or ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs; dress and appearance; memberships to any association, foundation or trade union; criminal conviction and security measures and biometric data and genetic data*) may be transferred where it is specifically envisaged under the laws,
 - Special categories of personal data relating to the health and sex life of the data subject may only be processed by persons under the obligation of confidentiality or authorized institutions and organizations only for the purposes of protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

3.6 TRANSFER OF PERSONAL DATA TO ABROAD

By taking necessary security measures (See Section 2/ Title 2.1) and in line with legitimate and lawful purposes our Company may transfer data subjects' personal data and special categories of personal data to third persons located abroad. Personal data are transferred by our Company to foreign countries where it is deemed by the Board that adequate protection is provided in this country ("Foreign Country with Adequate Protection") or to foreign countries where adequate protection is not provided, on the condition that the Board gives permission and the data controllers both in Turkey and in the country to which data is transferred undertake to provide adequate protection in writing ("Foreign Country Where the Data Controller Undertakes to Provide Adequate Protection") In this regard, our Company complies with the regulations provided under Article 9 of Law no. 6698. Detailed information regarding this subject is provided under Section 6 of this Policy.

3.6.1 Transfer of Personal Data to Abroad

In line with legitimate and lawful purposes, TOFAŞ may transfer personal data to a Foreign Country with Adequate Protection or to a Foreign Country Where the Data Controller Undertakes to Provide



Adequate Protection if data subject's explicit consent is obtained or under the circumstances listed below:

- if it is expressly permitted by any law,
- if it is necessary in order to protect the life or physical integrity of the data subject or a third party where the data subject is physically or legally incapable of giving consent,
- if it is necessary to process the personal data of parties of a contract, provided that the processing is directly related to the execution or performance of the contract,
- if it is necessary for compliance with a legal obligation which TOFAŞ is subject to,
- if the relevant information is revealed to the public by the data subject himself,
- if it is necessary for the institution, usage, or protection of a right,
- It is necessary for the legitimate interests of our Company, provided that the fundamental rights and freedoms of the data subject are protected.

3.6.2 Transfer of Special Categories of Personal Data to Abroad

By acting carefully, and taking the necessary security measures (see Section 2/ Title 2.1.) and taking adequate measures foreseen by the Board, our Company, in line with legitimate and lawful purposes, may transfer special categories of personal data to a Foreign Country with Adequate Protection or to a Foreign Country where the Data Controller Undertakes to Provide Adequate Protection under the circumstances listed below:

- if the data subject has explicitly consented,
- if the data subject has not explicitly consented but;
 - Special categories of personal data other than data relating to health and sex life of the data subject (Data relating to an individual's racial or ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs; dress and appearance; memberships to any association, foundation or trade union; criminal conviction and security measures and biometric data and genetic data) may be transferred where it is specifically envisaged under the laws,
 - Special categories of personal data relating to the health and sex life of the data subject may only be processed by persons under the obligation of confidentiality or authorized institutions and organizations only for the purposes of protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

4. CATEGORIZATION, PROCESSING PURPOSES AND RETENTION PERIODS OF PERSONAL DATA PROCESSED BY OUR COMPANY

Within the scope of obligation of providing information under Article 10 of the Law no.6698, our Company notifies the data subject regarding which personal data of which data subjects categories are processed, purposes of processing the personal data of the data subject and retention periods.



4.1 CATEGORIZATION OF PERSONAL DATA

By informing the relevant parties in accordance with Article 10 of the Law, in line with the lawful and legitimate processing purposes of our Company based on and limited to one or more than one of the conditions for data processing set forth under Article 5 of the Law no. 6698, below mentioned categories of personal data are processed in accordance with the principles based on Article 4 of the Law no. 6698 and other general principles and obligations provided under the Law and limited to the subjects (Customer, Potential Customer, Visitor, Third Person, Company Shareholder, Company

Official, Employees, Shareholders and Officials of Institutions that Our Company cooperates with) specified under this Policy. Detailed information regarding the data subjects with whom the categories of personal data are related under the scope of this Policy can be found under Section 5 of this Policy.

CATEGORIZATION OF PERSONAL DATA	EXPLANATION OF PERSONAL DATA CATEGORIZATION
Identity Information	All identity information provided on the documents such as Driver's Licence, Identity Document, Residency, Passport; for example name and surname, identity number, nationality, name of parents, place and date of birth, tax number, social security number, signature, license plate which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.
Contact Information	Information such as phone number, address, e-mail, fax number, IP address which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.
Location Data	Information locating the vehicles of the Company that are used by data subjects as part of operations conducted by TOFAŞ business units, used by data subjects while using the goods and services of our affiliate companies or by the employees of institutions that we are in cooperation with; such as GPS location, travel information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.
Customer Information	Information obtained and generated as a result of the operations conducted by our business units for our business operations which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.

Information on Family Members and Relatives	Information relating to the family member and relatives (for example spouse, parents or children) of the data subject that are processed for the purposes of protecting the legal interests of the Company and the data subject as part of operations conducted by TOFAŞ business units which explicitly belongs to an identified or identifiable real person and are a part of the data recording system.
Customer Process Information	Information such as records of the use of goods and services and instructions and requests necessary for customer's use of goods and services which explicitly belongs to an identified or identifiable real person and are a part of the data recording system.
Physical Premises Security Information	Personal data relating to the records and documents obtained when entering to physical premises and during the stay in such premises which explicitly belongs to an identified or identifiable real person and are a part of the data recording system, such as camera records, fingerprints and records received at security desk.
Process Security Information	Personal data processed for the purposes of ensuring technical, administrative, legal and commercial security of both our employees and our Company during the conduct of commercial activities of our Company which explicitly belongs to an identified or identifiable real person and are a part of the data recording system.
Risk Management Information	Personal data processed by means in accordance with legal principles, customs of trade and principles of good faith for us to manage our commercial, technical and administrative risks which explicitly belongs to an identified or identifiable real person and are a part of the data recording system.
Financial Information	Personal data processed with respect to indicating all financial information, document and records generated based on the nature of the legal relation established between our company and the data subject; such as customer number, IBAN number, credit card information, financial profile, property ownership information, income information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.
Audio/Visual Information	Information which explicitly belongs to an identified or identifiable real person, such as photograph or camera records (except data belonging to Physical Premises Security Information category), voice recording and copies of documents containing personal data.



Personnel Information	Any personal data processed for obtaining the information that is required for the establishing the basis of personnel rights of our employees or real persons having a working relation with our Company; which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.
Employee Process Information	Data processed with respect to all operations, carried out by our employees or real persons having a working relation with our Company; such as e-mail, entrance and exit information for Company premises, business trips or travel allowance data which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.
Employee Information	All kinds of personal data belonging to employees or or real persons having a working relation with our Company that are not listed in other categories which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.
Employee Performance and Career Development Information	Personal data processed for evaluating performances of our employees or real persons having a working relation with our Company, planning and executing their career developments within the scope of the human resources policies of our Company which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.
Legal Procedure and Compliance Information	Your personal data processed for the purposes of determining and following our legal receivables and rights and performance of our obligations and within the scope of compliance with the legal obligations of our Company and Company policies, such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.
Audit and Inspection Information	Your personal data processed within the scope of compliance with the legal obligations of our Company and Company policies, such information which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.
Special Categories of Personal Data	Data stated under Article 6 of Law no. 6698 (such as health data like blood type, biometric data, religion or association membership information) which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.



Marketing Information	Personal data processed for the purposes of personalization of our goods and services based on the usage habits, preferences and requirements of the data subject, as well as reports and evaluations produced as a result of processing such information which explicitly belongs to an identified or identifiable real person and are a part of the data recording system.
Request/ Complaint Management Information	Personal data relating to the receipt and evaluation of all requests or complaints addressed to our Company which explicitly belongs to an identified or identifiable real person and processed wholly or partly by automatic means or by non-automatic means as a part of the data recording system.

4.2 PURPOSES OF PERSONAL DATA PROCESSING

Our Company processes personal data limited to the purposes and terms set forth within the personal data processing conditions provided under article 5/2 and 6/3 of the Law no 6698. These purposes and terms are as follows;

- Processing of your personal data for the performance of a relevant activity by our Company when it is specifically envisaged under the laws,
- Processing by our Company is directly related and necessary for the execution or performance of a contract,
- Processing is necessary for compliance with a legal obligation to which our Company is subject,
- Provided that personal data has been made publicly available by you, processing of your personal data by our company when it is limited to the purpose of making such data available,
- Processing is necessary for the establishment, exercise or protection of a right,
- Processing is necessary for the purpose of the legitimate interests pursued by our Company provided that such interest does not harm your fundamental rights and freedoms
- Processing is necessary to protect the vital interests or bodily integrity of the data subject or a third person if the data subject is not in a condition to express his/her consent due to actual impossibility,
- Processing of special categories of personal data other than data relating to health and sex life of the data subject where it is specifically envisaged under the laws,
- Processing of special categories of personal data relating to the health and sex life of the data subject only by persons under the obligation of confidentiality or authorized institutions and organizations only for the purposes of protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

In this context our Company processes your personal data for the following purposes:



- After-sales support services
- Event management
- Keeping and tracking of visitor records
- Management of recruitment processes
- Management of relationships with business partners and suppliers
- Management of requests and complaints
- Monitoring and supervising employees' business activities
- Monitoring financial transactions
- Monitoring legal affairs
- Planning and executing external training activities
- Planning and executing internal training activities
- Planning and executing talent/career development activities
- Planning and executing corporate communications activities
- Planning and executing business partners' and suppliers' access to information
- Planning and executing vested benefits and interests for employees
- Planning and executing supply chain management procedures
- Planning and executing import and export operations
- Planning and executing sales processes of products and services
- Planning and executing marketing processes of products and services
- Planning and executing customer relations management
- Planning and performance of sales and marketing activities for second-hand products
- Providing information to authorized institutions in accordance with relevant legislations

In the event that above stated activities do not meet the conditions of personal data processing under the Law no. 6698, the Company obtains explicit consent of data subject in order to carry out data processing activities.

4.3 RETENTION PERIOD OF PERSONAL DATA

Our Company retains personal data for the period foreseen under the relevant laws.

In case a period for which the data shall be retained is not provided under the legislation, personal data shall be retained for a period as per the implementations of the Company with respect to the services provided while processing such data and the ordinary course of business and such data are then erased, destroyed or anonymized. Detailed information regarding this subject is provided under Section 9 of this Policy.

In case the processing purpose has fulfilled and the duration for retention specified by the relevant legislation and the Company has expired, personal data may only be kept for the purposes of citing as evidence in possible legal conflicts or asserting the relevant rights with respect to personal data or forming a defense. Retention periods are determined based on statute of limitation relating to the



asserting of the said right or examples in complaints brought against the Company for the same scope that have already been brought even though the statute of limitation has already expired. In such cases retained personal data cannot be accessed for other purposes and further access is allowed only when the access is necessary for a legal dispute. Personal data are erased, destroyed or anonymized following the expiration of the aforesaid period.

5. CATEGORIZATION RELATING TO THE DATA SUBJECTS OF WHOSE PERSONAL DATA ARE PROCESSED BY OUR COMPANY

Although personal data relating to the categories of personal data subjects that are listed below are processed by our Company, the scope of this Policy is limited to our customers, potential customers, visitors, third parties, company shareholders, company officials, employees, shareholders and officials of institutions we are in cooperation with.

Processing of our employees’ personal data and protection of their personal data shall be assessed according to Policy on the Protection and Processing of Personal Data of TOFAŞ. Employees.

Although categories of persons of whose personal data are processed by our Company are within the scope stated above, persons who are outside of such categories may also forward their requests to our Company within the scope of the Law no. 6698; such requests of these persons shall be evaluated within the scope of this Policy.

Explanations are provided below regarding the concepts of Customers, Potential Customers, Visitors, Third Parties, Company Shareholders, Company Representatives and Employees, Shareholders and Representatives of Institutions that Our Company Cooperates ,within the scope of this Policy.

Data Subject Category	Explanation
Customer	Real persons who are using or have used the goods and services provided by our Company regardless of whether he has a contractual relation with our Company
Potential Customer	Real persons who have requested to use or have shown interest on using our goods and services or it is believed that he has shown such interest as per the customs of trade and principles of good faith.
Visitor	Real persons who visit our web site or who has accessed to the physical premises of our Company
Third Person	Third party real persons who do not fall under the scope of this Policy or Policy on the Protection and Processing of Personal Data of TOFAŞ Employees (For example Guarantor, Companion, Family Members and Relatives, Former Employees)



Press	Real persons whose personal data is processed as part of corporate communication activities regardless of whether he has a contractual relation with our Company
Company Shareholder	Real person shareholders of our Company official
Company Official	Board Members of our Company or other third persons authorized by our Company
Employees, Shareholders and Officials of Institutions we are in Cooperation with	Real persons who are an employee, shareholder or official of the institutions that our Company has any kind of business relations with (including but not limited to business partner, supplier)

In the below table, above mentioned categories of data subject and which type of personal data is processed of these persons within such categories are detailed.

PERSONAL DATA CATEGORIZATION	CATEGORY OF DATA SUBJECT WITH WHOM THE RELEVANT PERSONAL DATA IS RELATED
Identity Information	Customer, Potential Customer, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person
Contact Information	Customer, Potential Customer, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person
Location Data	Customers, Employees or Officials of Institutions we're in Cooperation with
Customer Information	Customer
Information About Family Members and Relatives	Customer, Visitor, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person
Customer Process Information	Customer
Physical Premises Security Information	Visitor, Company Shareholders, Company Officials, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person
Process Security Information	Customer, Visitor, Company Officials, Employees, Shareholders and Officials of Institutions we are in Cooperation with
Risk Management Information	Customer, Potential Customer, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person



Financial Information	Customer, Company Shareholder, Company Official, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person
Audio/Visual Information	Customer, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person
Personnel Information	Employees, Shareholders and Officials of Institutions we are in Cooperation with
Employee Process Information	Employees of Institutions we are in Cooperation with
Employee Information	Employees of Institutions we are in Cooperation with
Employee Performance and Career Development Information	Employees of Institutions we are in Cooperation with
VestedBenefits and Interests	Employees of Institutions we are in Cooperation with
Legal Process and Compliance Information	Customer, Potential Customer,, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person
Inspection and Audit Information	Customer, Potential Customer,, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person
Special Categories of Personal Data	Customer, Potential Customer, Company Shareholder, Company Official, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person
Marketing Information	Customer, Potential Customer
Request/ Complaint Management Information	Customer, Potential Customer, Company Shareholder, Company Official, Visitor, Employees, Shareholders and Officials of Institutions we are in Cooperation with, Third Person



6. THIRD PARTIES TO WHOM PERSONAL DATA ARE TRANSFERRED BY OUR COMPANY AND PURPOSES OF TRANSFER

In accordance with Article 10 of Law no. 6698 our Company notifies data subjects regarding the group of persons to whom personal data have been transferred.

According to Articles 8 and 9 of Law no. 6698 (See Section 3/ Title 3.5) our Company may transfer personal data of the data subjects, governed by the Policy, to the below listed categories of persons:

- (i) Koç Holding and Koç Group Companies
- (ii) business partners of TOFAŞ,
- (iii) suppliers of TOFAŞ,
- (iv) affiliates of TOFAŞ,
- (v) shareholders of TOFAŞ
- (vi) Legally authorized public entities and institutions
- (vii) Legally authorized entities of private law

The scope of persons stated above to whom data is transferred and the purposes of data transfer is stated below.

Persons to Whom Data May be Transferred	Definition	Purpose of Data Transfer
Koç Group Companies	Affiliates of Koç Holding A.Ş.	For the purposes of executing business operations, to be carried out with the group companies
Koç Holding	Koç Holding A.Ş.	Limited to the business transactions to be carried out with the group companies and auditing purposes.
Business Partners	Parties which the Company has entered into a business partnership with, in the course of the Company's business activities, for the purposes of selling, promoting and marketing the goods and services of the Company, after sales support, conducting mutual customer loyalty programs.	Limited with ensuring the performance of the purposes of establishing the business partnership



Supplier	Parties providing services on contractual grounds, in the course of the Company's business activities, in accordance with the Company's orders and instructions to the Company under the order and instruction of the Company on a contractual basis	Limited with the purposes of providing services that the Company outsources from the suppliers and that are necessary for the performance of Company's business operations.
Affiliates	Companies of which our Company is a shareholder	Limited with ensuring the performance of business operations that requires the participation of subsidiaries t
Shareholders	Shareholders of TOFAŞ	Limited with the purpose of planning the strategies regarding business operations of the Company in accordance with the relevant legislation and auditing.
Legally Authorized Public Organizations and Institutions	In accordance with the relevant legislation, public organizations and institutions authorized to receive information and documentation from the Company	Limited with the purposes of the request made by the organization and institution within the scope of their legal authorization.
Legal entities of private law	In accordance with the relevant legislation, legal entities of private law authorized to receive information and documentation from the Company	Limited with the purposes of the request made by the relevant legal entities private law within the scope of their legal authorization.

Sections 2 and 3 of this Policy are complied with in transfers realized by our Company.



7. PROCESSING OF PERSONAL DATA BASED ON AND LIMITED TO THE CONDITIONS SET FORTH BY THE LAW

Our Company informs data subjects regarding the processing of their personal data in accordance with Article 10 of the Law no. 6698.

7.1. PROCESSING OF PERSONAL DATA AND SPECIAL CATEGORIES OF PERSONAL DATA

7.1.1. Processing of Personal Data

Data subject's explicit consent is one of the legal grounds for a lawful processing of personal data. Other than explicit consent, personal data may also be processed under the following conditions. Either one of the below mentioned conditions may be the legal grounds for processing personal data or more than one of such conditions may be the legal grounds for the same processing of personal data. In case the processed personal data are qualified under the special categories of personal data, conditions provided under section 7.1.2 are applied.

Although legal grounds for the processing of personal data by our Company may differentiate, general principles relating to the processing of personal data stated under Article 4 of Law no. 6698 (See Section 3.1.) are complied with.

(iii) Explicit Consent of the Data subject

One of the conditions for processing personal data is the explicit consent of the data subject. Explicit consent of the data subject shall be specific and freely given upon being informed.

Within the context of secondary processing activities (processing activities apart from the initial processing activities, intended for the purposes of collecting personal data), at least one of the derogations set forth under (ii), (iii), (iv) (v), (vi), (vii) and (viii) of this section is sought; otherwise the explicit consent of the data subject is obtained for the processing of personal data.

Data subject's explicit consent is obtained through specified methods in order to process personal data of which the processing is subject to the explicit consent of the data subject.

(iv) Specifically Envisaged Under Laws

Personal data of data subject may be lawfully processed in in case it is specifically envisaged under the laws.

Example: In accordance with Article 230 of the Tax Procedure Law, the name of the related person shall be included in the receipt.



(v) Not Being Able to Obtain the Data Subject's Explicit Consent due to Actual Impossibility

In cases where processing of personal data is necessary to protect the vital interests or bodily integrity of the data subject or a third person and if the data subject is not in a condition to express his/her consent due to actual impossibility, personal data of the data subject shall be processed without obtaining his/her explicit consent.

Example: Providing information to doctors, on the blood type of an employee who has fainted, by the company's human resources department.

(vi) Directly Related with the Execution or Performance of a Contract

Personal data of the parties to a contract may be processed, provided that it is directly related to and is necessary for the execution or performance of a contract.

Example: Obtaining the necessary personal data of the potential customer, for the performance of a sales agreement with our Company.

(vii) Fulfilment of a Legal Obligation by the Company

Data subject's personal data may be processed in case processing is necessary for the fulfillment of a legal obligation of the company as the data controller.

Example: Presenting the information requested by a subpoena to the Court.

(viii) Personal Data Made Publicly Available by the Data Subject

In the event that the data subject has made his personal data available to the public such personal data may be processed.

Example: When the customers of our Company present their complaints, requests or recommendations on a public platform on the Internet, personal data may be made publicly available. In this case, personal data may be processed by the officials of our Company, limited to the purpose of replying to such complaints, requests or recommendations.

(ix) Necessary for the Establishment, Exercise or Protection of a Right

Personal data of the data subject may be processed provided that the processing activity is necessary for the establishment, exercise or protection of a right,



Example: Retention and usage of personal data having the value of evidence (e.g. sales contract, invoice).

(x) Processing Personal Data Based on Legitimate Interest

Personal data of the data subject may be processed for the legitimate interests of the Company, provided that fundamental rights and freedoms of the data subject are not violated.

Example: Personal data processed for the purposes of maintaining security within company premises.

7.1.2. Processing of Special Categories of Personal Data

In case the data subject does not provide his explicit consent, special categories of personal data may be processed by our Company in the below mentioned conditions provided that sufficient measures specified by the Board are taken.

- (i) Special categories of personal data other than data relating to health and sex life of the data subject are processed where it is specifically envisaged under the laws,
- (ii) Special categories of personal data relating to the health and sex life of the data subject may only be processed by persons under the obligation of confidentiality or authorized institutions and organizations only for the purposes of protection of public health, preventive medicine, medical diagnosis, provision of care or treatment, planning and management of health services and their financing.

8. PERSONAL DATA PROCESSING ACTIVITIES UNDERTAKEN IN BUILDINGS, FACILITY ENTRANCES AND INSIDE THE PREMISES AND WEBSITE VISITORS

Personal data processing activities undertaken by our Company in building entrances and inside the facilities are performed in accordance with the Constitution, Law no. 6698 and other relevant legislation.

In order to ensure security by our Company, our Company performs surveillance in the buildings and facilities via security cameras and carries out data processing activities for monitoring visitor entrance and exits.

By way of using security cameras and recording visitor entrance and exits our Company carries out personal data processing activities.



8.1 CAMERA MONITORING ACTIVITIES UNDERTAKEN AT TOFAŞ BUILDINGS, FACILITY ENTRANCES AND INSIDE THE PREMISES

In this section, explanations concerning surveillance and monitoring system are provided and information shall be given on the protection of privacy and fundamental rights of the individuals. Purposes of surveillance by security cameras is ensure the safety of life and property of the company, data subjects and other persons and to protect the legitimate interests of such persons.

8.1.1. Legal Grounds for Camera Monitoring Activities

Camera monitoring activity is undertaken by our Company in accordance with Law on Private Security Services and relevant legislation.

8.1.2. Conducting Security Camera Monitoring Activities as per Law no. 6698

When undertaking surveillance camera monitoring activities by our Company for security purposes, regulations of the Law no. 6698 are complied with.

In order to ensure security in buildings and facilities, our Company undertakes security camera monitoring activities in accordance with and limited to the personal data processing conditions provided under Law no. 6698 and for purposes foreseen under the laws.

8.1.3. Announcement of Camera Monitoring Activity

Data subject is informed by the Company in accordance with article 10 of the Law no. 6698.

In addition to the information provided on the general matters, (See Section 3/ Heading 3.3) our Company, provides information regarding the camera monitoring activity by more than one method.

Thus, violation of the fundamental rights and freedoms of the data subject is prevented and transparency and informing the data subject is ensured.

In relation to the camera monitoring activity carried out by our Company; this Policy is published on our Company's web site (*online Policy regulation*) and notices are hung at entrances of areas where monitoring is made (*local informing*).

8.1.4. Purpose of Camera Monitoring Activity and Limitation of Purpose

Our Company, processes personal data relevant, limited and proportionate to the purposes for which personal data are processed in accordance with Article 4 of Law no. 6698.

The purpose of pursuing camera monitoring activity by our Company is limited to the purposes stated under this Policy. In this regard, security cameras' monitoring areas, number and when the monitoring shall take place are implemented necessary for and limited to achieving the security purpose.



Monitoring exceeding the security purposes and that may interfere with the privacy of persons (such as monitoring in bathrooms) are not subject to surveillance.

8.1.5. Ensuring the Security of Data Obtained

Our Company takes the necessary technical and administrative measures for ensuring the security of personal data obtained from camera monitoring activities, in accordance with Article 12 of the Law no. 6698 (See Section 2 / Title 2.1)

8.1.6. Retention Period of Personal Data Obtained From Camera Monitoring Activities

Detailed information regarding our Company's retention period of personal data obtained from camera monitoring activities are provided under Article 4.3. with the title Retention Period of Personal Data of this Policy.

8.1.7. Access To Information Obtained From Monitoring Activities and The Parties to Whom This Information is Disclosed

Only limited number of TOFAŞ employees have access to the retained digital records. Live footage may be monitored by outsourced security officers. Limited number of people having access to records are under the obligation of confidentiality concerning the personal data in line with the non-disclosure undertaking.

8.2 MONITORING VISITOR ENTRANCES AND EXITS UNDERTAKEN IN TOFAŞ BUILDINGS, AND FACILITY ENTRANCES AND INSIDE PREMISES

For ensuring the security and for other purposes specified under this Policy, our Company carries out personal data processing activities relating to the monitoring of visitor entrances and exits in TOFAŞ buildings and facilities.

When personal data of persons visiting TOFAŞ Buildings are collected data subjects are informed by texts hung at the Company or by other means that are made available to our visitors. Data obtained for the purpose of monitoring the visitor entrance and exits are processed only for this purpose and relevant personal data are physically or electronically stored on the data recording system.

8.3 KEEPING THE RECORDS OF INTERNET ACCESS PROVIDED TO OUR VISITORS AT THE BUILDINGS AND FACILITIES OF TOFAŞ

For purposes of ensuring security by our Company and for the purposes stated under this Policy; internet access may be provided to our visitors upon their request as long as their stay in our buildings and facilities. In such case, log records on your internet access are recorded pursuant to the mandatory rules of Law no. 5651 and secondary regulation legislated according to such Law. Such records are



processed only for the purposes of meeting the requests made by the authorized public institutions and organizations or fulfilling our legal obligations in the internal auditing procedures.

Within this framework, a limited number of TOFAŞ employees may access to these log records. Employees having access to such log records only access to such information for meeting the requests of authorized public institutions and organizations or for using such information in internal auditing procedures and share these solely with legally authorized persons. Limited number of persons having access to the records are under the obligation of confidentiality in the line with the non-disclosure undertaking.

8.4 WEBSITE VISITORS

Our Company records internet activities obtained by technical means (such as cookies) on the websites belonging to the Company for the purposes of ensuring that the visits of the visitors meet the purpose of visiting, to provide customized content and conduct online promoting activities.

Detailed explanations on the protection and processing of personal data relating to the activities conducted by our Company are provided on the relevant website under the TOFAŞ Türk Otomobil Fabrikası A.Ş. Privacy Policy”

9. CONDITIONS ON ERASURE, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

In accordance with the Article 138 of the Turkish Criminal Code and the Article 7 of Law no. 6698, despite being processed in line with the provisions set forth by the relevant Laws, in the event that the purposes of processing are no longer present, personal data is erased, destroyed or anonymized with regard to TOFAŞ’s decision or upon the request of the data subject.

9.1 TOFAŞ’S OBLIGATION TO ERASE, DESTROY AND ANONYMIZE PERSONAL DATA

As regulated by Article 128 of the Turkish Penal Code and Article 7 of the Law no. 6698 despite being processed in accordance with the relevant legislation, in case the processing is no longer necessary for the purpose of which the data was processed, personal data are erased, destroyed or anonymized upon request of the data subject or based on the decision of our Company. Within this context, our Company fulfills its obligation by methods explained under this section.

9.2 TECHNIQUES FOR THE ERASURE, DESTRUCTION AND ANONYMIZING PERSONAL DATA

9.2.1. Techniques for Erasure and Destruction of Personal Data

Despite being processed in accordance with the relevant legislation, in case the processing is no longer necessary for the purpose of which the data was processed, personal data are erased or destroyed upon



request of the data subject or based on the decision of our Company. Erasure and destruction techniques mostly used by our Company are as follows:

(i) Physical Destruction

Personal data may be processed by non-automated means provided that they are a part of a data recording system. A physical destruction technique is applied in order to erase/destroy such data in a way that they cannot be reused .

(ii) Secure Deletion Software

Techniques of erasing the data from the software is used when erasing/destroying personal data that are processed wholly or partly by automatic means and kept in digital environments so that they cannot be retrieved.

(iii) Sending to a Specialist for Secure Deletion

Under certain circumstances, TOFAŞ may cooperate with an expert for the erasure of personal data on behalf of itself. In such case, personal data are securely erased/destroyed by the expert in a way that they cannot be retrieved.

9.2.2. Techniques for Anonymizing Personal Data

Anonymizing personal data means rendering personal data in a way that data is no longer identified or identifiable with a natural person, even by linking with other data.. Our company may also anonymize personal data that are processed in accordance with the law in the event that these purposes are no longer present for which the data have been processed.

In accordance with Article 28 of the Law no. 6698 anonymized personal data may be processed for research, planning and statistical purposes. Such activities are outside the scope of the Law no. 6698 and therefore do not require the explicit consent of the data subject. Since processing anonymized personal data is outside the scope of the Law, rights stated under Section 10 of this Policy shall not be applicable.

10. RIGHTS OF THE DATA SUBJECTS; METHODOLOGY FOR THE USE AND EVALUATION OF THESE RIGHTS

Our Company informs data subjects regarding their rights in accordance with Article 10 of the Law no. 6698, provides guidance for the data subjects on how these rights shall be exercised. Our Company carries out required channels, internal operations and takes administrative and technical measures in accordance with Article 13 of the Law no. 6698 for the evaluation of data subjects' rights and providing necessary information for the data subjects.



10.1 THE RIGHTS OF THE DATA SUBJECT AND THE EXERCISE OF THESE RIGHTS

10.1.1. Rights of the Data Subject

Data subjects are entitled to the following rights:

- (1) Learn whether or not data relating to him/her are being processed;
- (2) Request further information if personal data relating to him have been processed;
- (3) Learn the purpose of the processing of personal data and whether or not data are being processed in compliance with such purpose;
- (4) Learn the third party recipients to whom the data are disclosed within the country or abroad,
- (5) Request rectification of the processed personal data which is incomplete or inaccurate and request such process to be notified to third persons to whom personal data is transferred.
- (6) Request erasure or destruction of personal data in the event that the data is no longer necessary in relation to the purpose for which the personal data was collected, despite being processed in line with the Law no. 6698 and other applicable laws and request such process to be notified to third persons to whom personal data is transferred.
- (7) Object to negative consequences about him/her that are concluded as a result of analysis of the processed personal data by solely automatic means,
- (8) Demand compensation for the damages he/she has suffered as a result of an unlawful processing operation.

10.1.2. Circumstances Where Rights of the Data Subject May Not Be Asserted

As per Article 28 of the Law no. 6698, data subjects may not assert their rights stated under article 10.1.1 since the below mentioned circumstances are not included within the scope of the Law:

- (1) Processing personal data with official statistics by way of anonymization for research, planning and statistical reasons,
- (2) Processing personal data within the scope of national defense, national security, public security, economic security, right to privacy or for artistic, historical, literary, scientific purposes or within the scope of freedom of expression on condition that personal rights are not violated or any crimes have not been committed,
- (3) Processing of personal data by public bodies and organizations assigned and authorized by law, regarding preventive, protective and informative activities directed at securing national defense, national security, public security, public order or economic security,
- (1) Processing personal data regarding transactions related to investigation, prosecution, judicial and enforcement by judiciary and enforcement authorities.



Pursuant to the Article 28/2 of the Law no. 6698 data subjects may not assert their rights stated under Section 10.1.1, other than the right to demand compensation for damages, under the below mentioned circumstances:

- (1) Processing personal data is required for the prevention of crime or prosecution of criminal offences,
- (2) Processing personal data which are made public by data subject,
- (3) Processing personal data is required for conducting disciplinary investigations prosecution and auditing and regulating duties by public institutions and organizations and professional organizations having the quality of public institutions based on their authorities stated by laws,
- (4) Processing of personal data is necessary for the protection of state's economic and financial interests with regard to budgetary, taxation and financial matters.

10.1.3. The Exercise of the Data Subject's Rights

Data subjects may forward their requests concerning their rights stated under Title 10.1.1. to our Company, including information verifying their identities, free of charge through the below stated methods or other methods determined by the Board:

- (1) By way of filling the form provided on the website www.tofas.com.tr, handing a copy of the form with an original signature or forwarding through notary process to the Büyükdere Cad. No:145 Tofaşhan Zincirlikuyu İstanbul
- (2) By way of filling the form on the website www.tofas.com.tr and by signing the form with your electronic signature registered pursuant to the Law on Electronic Signature numbered 5070 and forwarding the form via registered electronic mail system to the address tof@tof.as.hs02.kep.tr

For third parties to make requests on behalf of data subjects, a special power of attorney issued by a notary must be presented

10.2 RESPONSE OF TOFAŞ TO THE APPLICATIONS

10.2.1 Company's Procedure and Term for Responding to Applications

In the event that data subject forwards his request to our Company in line with the procedure set forth under Title 10.1.3. of this Section, our Company shall conclude the relevant request according to the nature of the request as soon as possible and within no longer than thirty days and free of charge. In case a certain charge is envisaged by the Board, the data subject shall be charged according to the tariffs determined by the Board..



10.2.2 Information the Company May Request from the Applicant

The Company may request information from relevant person in order to determine whether the applicant is the data subject. In order to clarify the matters in the data subject's application the Company may address questions to the data subject concerning his application.

10.2.3 Company's Right to Refuse the Application of the Data Subject

Under below mentioned circumstances, our Company may refuse the application of data subject by declaring the reasons for such refusal:

- (1) Processing of personal data by anonymizing through official statistics with such purposes of research, planning and statistics.
- (2) Processing personal data with the purposes of art, history, literature or science or within the scope of freedom of expression only if it does not constitute a crime and violation of national defence, national security, public security, public order, economic security and right of privacy.
- (3) Processing of personal data within the scope of the activities exercised by legally authorized public entities and organizations in order to ensure national defense, national security, public security, public order or economic security.
- (4) Processing of personal data by judicial or executive authorities regarding investigation, prosecution, judgment or execution procedures.
- (5) In case processing of personal data is required for the prevention of crime and prosecution of criminal offences.
- (6) Processing of personal data which has been made publicly available by the data subject.
- (7) In case processing of personal data is required for conducting disciplinary proceedings and prosecution or to fulfil the obligations of regulation or supervision of state institutions and organizations and professional organizations with public institution status.
- (8) In case processing of personal data is required for the protection of state's monetary interests relating to budget, taxes and financial matters.
- (9) Data subject's request is potentially violating the rights and freedoms of others.
- (10) Requests that require disproportionate effort.
- (11) In case the requested information is publicly known.

11. GOVERNANCE STRUCTURE OF THE COMPANY POLICY ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

A Governance structure is established by the Company to ensure that the operations are in compliance with the regulations of the Law No. 6698 and the enforcement of the Policy on the Protection and Processing of Personal Data.



The “Committee for the Protection of Personal Data” (“Committee”) has been established upon the decision of the Company executives, in order to govern procedures and instructions related to and associated with this Policy within the company.

ANNEX - 1 DEFINITIONS

Explicit consent	: Freely given, specific and informed consent;
Anonymization	: To change the personal data so that it loses its personal data quality irrevocably. For instance: Rendering personal data by no means identifiable with a natural person by masking, aggregation or data contamination techniques.
Application form	: Application form containing data subject’s request; Application Form Concerning Data Subject’s Application to Data Controller As Per Law No.6698
Employees, Shareholders and Officials of Institutions that Our Company Cooperates	: Real persons who are an employee, shareholder or official of the institutions that our Company has any kind of business relations with (including but not limited to business partner, supplier)
Business Partner	: Parties which the Company has entered into a business partnership with for the purposes like conducting mutual customer loyalty programs during the course of Company’s business activities
Processing of Personal Data	: Any operation which is performed upon personal data such as collection, recording, storage, preservation, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization or blocking its use by wholly or partly automatic means or otherwise than by automatic means which form part of a filing system
Data Subject	: Natural person whose personal data are processed. For example, candidate employees.
Personal Data	: Any information relating to an identified or identifiable natural person. The processing of legal persons’ data is not covered by law. Examples: name, surname, identity number, e-mail, address, date of birth, credit card number.
Special Categories of Personal Data:	Data relating to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of association, foundation or trade-union, health, sexual life, criminal conviction and security measures, and biometric and genetic data.



Company Shareholder	: Real persons who are a shareholder of our Company.
Company Official	: Board Members of our Company or other third persons authorized by our Company
Supplier:	Parties providing services during Company's business activities, to the Company under the orders and instructions of the Company on a contractual basis
Customer:	Real persons who are using or have used the goods and services provided by our Company regardless of whether he has a contractual relation with our Company
Potential Customer:	Real persons who have requested to use or have shown interest on using our goods and services or it is believed that he has shown such interest as per the customs of trade and principles of good faith.
Third Person:	
Data Processor:	Natural or legal person who processes personal data based on the authority granted by and on behalf of the data controller. For example; the cloud computing company which stores personal data TOFAŞ or the call center company which calls customers within the scope of scripts.
Data Controller:	Natural or legal person who determines the purposes and means of the processing of personal data, and who is responsible for establishment and management of the filing system.
Visitor:	Real persons who visit our web site or who has accessed to the physical premises of our Company.



ANNEX 2- ABBREVIATIONS

Law no. 6698	: Law on Protection of Personal Data numbered 6698 and dated March 24, 2016 published in the Official Gazette dated April 7, 2016 and numbered 29677.
Constitution	: Constitution of the Republic of Turkey dated November 7, 1982 and numbered 2709 published in the Official Gazette dated November 9, 1982 numbered 17863.
Board	: Personal Data Protection Board
Authority	: Personal Data Protection Authority
Policy	: TOFAŞ Türk Otomobil Fabrikası A.Ş. Policy on the Protection and Processing of Personal Data
Company/ TOFAŞ	: TOFAŞ Türk Otomobil Fabrikası A.Ş.
Turkish Penal Code	: Turkish Penal Code dated September 26, 2004 and numbered 5237 as published in the Official Gazette dated October 12, 2004 and numbered 25611.