

PIMSA OTOMOTIV A.S.
POLICY ON PERSONAL DATA PROCESSING

A. SCOPE

1. This POLICY ON PERSONAL DATA PROCESSING ("Policy") applies to all directorates, units and employees of the Pimsa Otomotiv A.S. and the third parties involved in the personal data processing.
2. This Policy covers all the storage and destruction activities to be implemented by Pimsa Otomotiv A.S. on the personal data.
3. This Policy shall only be applied for the destruction and storage of personal data.
4. In the event that the Law, Regulation or other legislation is partially or wholly amended, updated or repealed, the Company shall change the Policy by updating it in accordance with the new Law, Regulation or legislation.

B. DEFINITIONS

The terms used in this Policy have the following meanings.

Receiver Group	Natural or legal persons to which the data controller transfers personal data.
Relevant User	Except those who are responsible for the technical storage, preservation and backup of the data, those who process personal data within the organization of the data controller or with the authority given by the data controller.
Destruction	The deletion, destruction or anonymization of personal data.
Law	Law No. 6698 on the Protection of Personal Data
Recording Medium	Any medium in which personal data is recorded to be processed fully or partially by automatic ways as a part of any data recording system.
Personal Data Processing Inventory	An inventory where data controllers detail their data processing activities in accordance with business processes of Pimsa Otomotiv A.S. The inventory shall have the following information; the details of the personal data being processed, the data categories, the recipient group and the data owner group, and the maximum period for the purposes for which the personal data are processed, the personal data foreseen to be transferred to foreign countries, and the measures taken regarding data security.
Board	Personal Data Protection Board.
Periodic Destruction	In the event that all of the personal data processing conditions in the Law are eliminated, Deletion, destruction or anonymization to be carried out ex officio by the Pimsa Otomotiv A.S. at certain time intervals specified in this Policy.
Registry	Registry of Data Controllers kept by the Presidency
Data Recording System	The recording system in which personal data are structured based on certain criteria.
Data Controller	Natural or legal person responsible for the determination of the processing purposes and means of the personal data, and the establishment and management of the data recording system.
Regulations	Regulations on Deletion, Destruction or Anonymization of Personal Data.

C. PURPOSE AND SCOPE

This Policy applies to natural or legal persons who are responsible for the destruction of personal data included in the Regulations established in accordance with Article 7 of the Law, and determines the principles to be followed by the third parties held contractually liable by the Pimsa Otomotiv A.S.

Pursuant to the Regulations, the Pimsa Otomotiv A.S, as a Data Controller, is obliged to register in the Registry, prepare this Policy, store the personal data in its possession in accordance with the personal data inventory and destroy it when necessary.

The following principles shall apply to the storage and destruction of personal data:

- a) The general principles set forth in Article 4 of the Law shall be complied with.
- b) Pimsa Otomotiv A.S. accepts that having prepared this Policy does not mean that personal data is destroyed in accordance with the Regulations, Law and relevant legislation.
- c) Pimsa Otomotiv A.S. declares and undertakes that while storing or deleting personal data, destroying it or making it anonymous, it shall act in accordance with the security measures specified in the Article 12 of the Law, regulations and policy.
- d) Pimsa Otomotiv A.S., undertakes that it will comply with this Policy and tools, programs and processes to be applied in line with the Policy during the deletion, destruction or anonymization of the personal data processed in ways whose objective is fully or partially automatic or non automatic on the condition that it is of part of any recording system.
- e) Pimsa Otomotiv A.S. takes all necessary technical and administrative measures required by Law regarding the storage of personal data and the prevention of unlawful processing and access. The technical and administrative measures are described in the technical guides on the methods to be used for the storage and destruction of personal data.
- f) Pimsa Otomotiv A.S. determines the titles, units and job descriptions of those who will take part in the storage and destruction of personal data.

D. Recording Media

Pimsa Otomotiv A.S. undertakes to include in this Policy the media which has Personal Data and listed below as well as Personal Data in other media that arise additionally:

- a) Computers/servers,
- b) Network devices,
- c) Shared/non-shared disk drives used for storing data on a network,
- d) Mobile phones and all storage areas inside them,
- e) Paper,
- f) Microfiche,
- g) Peripherals such as printer, fingerprint reader,
- h) Magnetic bands,
- i) Optical discs,
- j) Flash memories.

E. CONDITIONS REQUIRING THE STORAGE AND DESTRUCTION OF PERSONAL DATA

In the event of a breach in the scope stated below, it will be considered a potential security breach. Pimsa Otomotiv A.S shall take the relevant actions on the security breaches, and the Senior Management of Pimsa Otomotiv A.S. shall submit the required reports and notifications to the Board and the relevant personal data owners. For this purpose, the violation management procedures of Pimsa Otomotiv A.S. shall be applied to submit the reports and notifications.

1. Violation of the Law

Pimsa Otomotiv A.S. undertakes that it will not process personal data contrary to the way set out in the law.

Unless there are exceptions to the terms of processing personal data in the Articles 5 and 6 of the Law, Pimsa Otomotiv A.S.;

- a) shall not store the personal data of those whose explicit consent has not been obtained, except for the exceptions specified in the Law.

- b) In the event that the purpose of processing the data under the exception or within the scope of explicit consent is repealed and/or the legal retention periods expire, Pimsa Otomotiv A.S. shall not store or destroy this personal data.

2. Repeal of Data Processing Requirements

Pimsa Otomotiv A.S. is responsible for the up-to-date nature of the data processing requirements and shares this responsibility with all its employees.

The employees may not continue to process data in cases where all of the conditions of processing data have been eliminated. These requirements shall be determined the PDPL Committee with the proposal of the relevant business unit. The destruction procedures shall be performed in accordance with this Policy.

Pimsa Otomotiv A.S. acknowledges that the requirements for processing data have been repealed in the relevant cases listed below and specified in the Regulation:

- a) Amendment or repeal of the regulations which are the basis for processing personal data,
- b) The contract between the parties has never been established, the contract is invalid, the contract is expired, the contract is terminated or the contract is repealed,
- c) Repeal of the purpose requiring processing,
- d) Processing personal data against the law or principle of honesty,
- e) In cases where the processing of personal data takes place only on the condition of explicit consent, the person concerned withdraws their explicit consent,
- f) Acceptance of the data owner's duly application regarding the processing of personal data under the rights specified in the Law, Article 11, paragraph (e) and (f),
- g) In the event that the Pimsa Otomotiv A.S. refuses the application made by the request of the data owner to delete or destroy his personal data, that the response is insufficient or that he/she does not respond within the period stipulated in the law, a complaint is made to the board and that the request is found to be appropriate by the Board,
- h) Although the maximum period of time required to store personal data has passed, there are no conditions that justify storing personal data for longer.

F. DESTRUCTION OF PERSONAL DATA

The Destruction of Personal Data can be made in three different ways: Deletion, Destruction or Anonymization.

In line with the information to be given by the relevant business units within Pimsa Otomotiv A.S., the information systems containing the personal data and the owners of the application, the PDPL Committee makes a decision on the method to be applied for the destruction of personal data, depending on the reason for this destruction. Based on this decision, one of the destruction methods in Article G) of this Policy shall be applied in accordance with the Guidelines on Deletion, Destruction and Anonymization of Personal Data published by the Board.

Regarding the methods to be used for the storage and destruction of personal data, Pimsa Otomotiv A.S. creates technical guidelines and ensures their implementation.

The relevant data owner business unit within the Pimsa Otomotiv A.S. is responsible for monitoring the destruction of personal data. The data owner business unit receives support from different units of Pimsa Otomotiv A.S. for the destruction of data, provided that it is audited by itself.

1. Deletion of Personal Data

The deletion of Personal Data processed in whole or in part by automatic means is the process of making such personal data inaccessible and unusable in any way by the relevant users.

In the process of deletion of personal data as a part of any data recording system, which is processed by non-automatic means, the personal data to be deleted is determined by taking into account the legal retention periods. Pimsa Otomotiv A.S. shall update the roles and authorization matrices on information systems and applications in terms of accessing and authorizing personal data,

and shall identify the relevant users. The authorizations and methods such as access, retrieval and reuse by the Relevant Users shall be determined within this scope.

In cases where Pimsa Otomotiv A.S. deletes personal data, it shall make the data inaccessible or reusable in any way. Pimsa Otomotiv A.S., guarantees that the data is not accessible or reusable by any user while doing this.

2. Destruction of Personal Data

Destruction of personal data refers to the process of making personal data inaccessible, unrecoverable and unusable by anyone in any way.

The destruction shall be made in cases where Pimsa Otomotiv A.S. processes the data in physical recording media. Pimsa Otomotiv A.S. is obliged to make this data impossible to recover.

The paper and microfiche media shall be destroyed by dividing it into small pieces so that they may not be reassembled with paper shredders or clipping machines. In addition, Pimsa Otomotiv A.Ş. may receive disposal or destruction services from the Third Parties.

3. Anonymization of Personal Data

Anonymization is the process of making personal data impossible to be associated with an identified or identifiable natural person, even if it is matched with other data, in cases where the personal data processed in whole or in part using automatic means by Pimsa Otomotiv A.S.

Pimsa Otomotiv A.S. shall remove or change all direct and/or indirect identifiers in the relevant data set, and therefore prevent the identity of the data owner from being identified or loses its distinction in a group or crowd in a way that cannot be associated with a real person.

During the anonymization of data, Pimsa Otomotiv A.S. may use methods such as unilateral functions and encryption.

G. METHODS OF DESTRUCTION OF PERSONAL DATA

For the Deletion of Personal Data, Pimsa Otomotiv A.S. defines in this policy all methods that may be used for the destruction of personal data. The data owner business unit is obliged to implement the appropriate method in this policy according to the appropriate circumstances.

During the destruction of personal data, Pimsa Otomotiv A.S. perform the process by choosing the appropriate one among the following methods:

1. Overwriting

It is the process of making old data unreadable by overwriting random data consisting of 0 and 1s at least 7 times using software on magnetic environment and rewritable optical media.

2. Magnetizing

It is the process of making the data on the magnetic environment unreadable by applying physical changes in a high-value magnetic field.

3. Physical Destruction

It is the process of physical destruction of optical media or magnetic environment by melting, pulverizing, grinding, and similar processes. It can be applied in cases where magnetizing or overwriting methods fail.

4. Cloud Systems

It is the process of destroying all copies of the encryption keys of Personal Data after notification of the destruction of Personal Data held on cloud systems is made to the contracted service provider.

5. Destruction Of Personal Data In Peripheral Systems

It is the process of destruction through overwriting, magnetizing or physically destroying if available, internal unit, if not, all devices which are inside the systems such as a printer, fingerprint unit, the internal unit, door entry and that holds Personal Data. This type of destruction must be made before the devices are subject to backup, maintenance and similar operations.

H. STORAGE AND DESTRUCTION PERIODS

1. Periodic Destruction and Legal Retention Periods

Physical and digital data that complete the legal storage and Destruction periods are periodically destroyed. Pimsa Otomotiv A.S. shall delete, destroy or anonymize personal data in the first periodic destruction process following the date of obligation to delete, destroy or anonymize personal data.

Periodic Destruction is carried out in 6-month time intervals for all Personal Data. The legal storage and Destruction periods to be based on Periodic Destruction are determined in the Personal Data Inventory. The destruction is carried out during the first Periodic destruction following the date of obligation to delete, destroy or anonymize personal data. the first obligation of destruction.

Transactions relating to deleted, destroyed and anonymized data are kept free from other legal obligations for a period of at least 3 years.

2. The Process of Deletion and Destruction Following the Request by The Data Owners

In cases where the data holders apply to Pimsa Otomotiv A.S. and request that their personal data be deleted or destroyed, Pimsa Otomotiv A.S. shall control the current status of the conditions for processing the personal data and takes related actions accordingly. As a result of the above-mentioned control,

- If all the conditions for processing personal data have been removed, Pimsa Otomotiv A.S. shall destroy the personal data owner to the request within thirty days at the latest and shall inform the data owner in accordance with the decisions and methods specified in this Policy.
- If all personal data processing requirements have been removed and the requested personal data has been transferred to third parties, the Pimsa Otomotiv A.S. shall notify the third party of this situation and ensure that the necessary procedures are carried out within the scope of the Directive before the third party.
- If the conditions for processing Personal Data have not been completely removed, the Pimsa Otomotiv A.S. may reject the request by explaining the justification to the data owner and notify the data owner in writing or electronically within thirty days at the latest.

In order to meet and respond to requests from the data owners, Pimsa shall establish the process of management of requests and complaints from personal data owners.

I. AUTHORIZATION IN STORAGE AND DESTRUCTION

The persons involved in the personal data storage and destruction processes and their job descriptions are as follows:

- PDPL Committee: The Committee meets once a month under the chairmanship of the Legal Counsel. The Committee decides on the policy and methods by working with the relevant business units on the storage and destruction of personal data, and ensures that the policy and its annexes are kept up to date, works closely with the Pimsa Otomotiv A.S.'s Process Management and other units to ensure that the Policy is handled correctly and in accordance with the Law and Regulations.
- Information technologies: It ensures that the relevant destruction and storage processes are performed based on the decisions and methods specified in the Policy in accordance with the Law and Regulation.
- Business units: It expresses its opinions and justifications for the determination of policies and methods on the storage and destruction of personal data and follows up the actions to be performed based on this Policy.

J. AMENDMENTS TO THE POLICY

1. In the event that the Law, Regulation or other legislation is partially or wholly amended, updated or repealed, the Pimsa Otomotiv A.S. shall change the Policy by updating it in accordance with the new Law, Regulation or legislation.
2. Pimsa Otomotiv A.S. shall share the changes made to the policy and the updated policy that can be reviewed with its employees via email and make it available to its employees via the corporate intranet.

K. EFFECTIVE DATE OF POLICY

This Policy entered into force on December 02, 2019.