

**TURCAS PETROL ANONİM ŐİRKETİ**  
**POLICY ON PROTECTION AND PROCESSING OF PERSONAL**  
**DATA**

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## 1. INTRODUCTION

### 1.1. Objective and Scope of the Policy

I. Law on the Protection of Personal Data No. 6698 (“**Law**”) entered into force on April 7th, 2016, and this Turcas Petrol Anonim Sirketi Policy on Processing and Protection of Personal Data (“**Policy**”) is aimed at ensuring Turcas Petrol Anonim Sirketi’s (“**Turcas**” or “**Company**”) compliance with the Law and specifying the principles that apply to the performance of obligations regarding the protection and processing of personal data by the Company.

The Policy specifies conditions for the processing of personal data and sets forth main principles adopted by the Company in connection with the processing of the personal data. In this framework, the Policy covers all personal data processing activities performed by the Company in accordance with the Law, all data subjects of whom personal data are processed by the Company and any personal data processed.

Matters related with processing of the personal data of Company’s employees are not within the scope of this Policy, and they are specified separately in Turcas Petrol Anonim Şirketi Policy on Processing and Protection of Employees’ Data.

Definitions of terms used in this Policy are provided in ANNEX-1.

### 1.2. Effective Date and Revision

The Policy has been published on the Company’s internet site and made available for access of the public. Provisions of the legislation shall prevail in case of any consistency between this Policy and applicable legislation particularly including the Law.

The Company reserves right to revise this Policy in parallel with the legislative regulations. Current version of the Policy is available at the [Company’s Website](#).

## 2. DATA SUBJECTS WITHIN THE SCOPE OF PERSONAL DATA PROCESSING ACTIVITIES PERFORMED BY OUR COMPANY, OBJECTIVES OF DATA PROCESSING AND CATEGORIES OF DATA

### 2.1. Data Subjects

Data subjects within the scope of this Policy are all real persons other than Company’s employees of whom personal data are processed by the Company. In this context, general categories of data subjects are as provided below:

CATEGORIES OF DATA SUBJECTS		DESCRIPTION
1	<b>Customer</b>	refers to real persons using products and services offered by the Company.
2	<b>Potential Customer</b>	refers to real persons who are interested in using products and services offered by the Company and have the potential of becoming customer.
3	<b>Visitor</b>	refers to real persons who visit the Company, store, premises and internet site.
4	<b>Prospective Employee</b>	refers to real persons who make an application to the Company by sending a CV or through other methods.
5	<b>Third Persons</b>	refers to real persons other than the aforementioned categories of data subject and Company’s employees.

Categories of data subject are specified for the purpose of providing general information. In case data subject is not within the scope of one of the aforementioned categories, this shall not eliminate the status of data subject as described in the Law.

**2.2. Objectives of Data Processing**

The Company may process your personal data and special categories of personal data for the following purposes in accordance with the conditions of personal data processing that are described in the Law and applicable legislation:

PRIMARY OBJECTIVES	SECONDARY OBJECTIVES
<p><b>Performance of necessary operations and implementation of the relevant processes by business functions in order to make the Company’s products and services available to the relevant persons</b></p>	<ol style="list-style-type: none"> <li>1. Planning and implementing management processes about customer relations;</li> <li>2. Pursuing contract processes and legal inquiries</li> </ol>
<p><b>Performance of necessary operations and implementation of the relevant business processes by the business functions in order to perform business activities of the Company</b></p>	<ol style="list-style-type: none"> <li>1. Event management;</li> <li>2. Planning and implementing corporate sustainability activities;</li> <li>3. Planning and implementing corporate governance activities;</li> <li>4. Planning and implementing corporate communication activities;</li> <li>5. Planning and implementing activities aimed at business continuity;</li> <li>6. Planning and implementing logistics activities;</li> <li>7. Planning and implementing transport activities;</li> <li>8. Planning and implementing business activities;</li> <li>9. Planning and implementing supply chain management processes;</li> <li>10. Planning and implementing production and operation processes;</li> <li>11. Planning, auditing and implementing information security processes;</li> <li>12. Formation and management of infrastructure for information technologies;</li> <li>13. Management of investor relations;</li> <li>14. Financial processes and accounting</li> </ol>
<p><b>Planning and Implementing the Company’s Human Resources Policies and Processes</b></p>	<ol style="list-style-type: none"> <li>1. Planning human resources processes;</li> <li>2. Execution of the employment agreement and performance of obligations under the applicable legislation;</li> <li>3. Salary management;</li> <li>4. Planning and implementing employee dismissal procedures;</li> <li>5. Implementing recruitment processes;</li> <li>6. Monitoring and audit of work-related activities of employees;</li> <li>7. Planning and implementing internal training activities;</li> <li>8. Planning and implementing benefits and interests of employees;</li> </ol>

	<ul style="list-style-type: none"> <li>9. Planning and implementing internal promotion- assignment and dismissal processes;</li> <li>10. Planning and implementing corporate communication activities aimed at employees and corporate social responsibility and civil society activities attended by employees.</li> <li>11. Planning and implementing internal orientation activities;</li> <li>12. Planning and implementing performance assessment of employees;</li> <li>13. Planning and implementing customer satisfaction and commitment processes;</li> <li>14. Planning and implementing employee’s authorizations for access to information;</li> <li>15. Procedures for working and residence permit of foreign national employees;</li> <li>16. Planning and implementing the processes aimed at receiving and evaluating proposals of employees on improvement of business and production processes;</li> <li>17. Recruitment, placement of trainees and planning and implementing operational processes;</li> <li>18. Planning and implementing external training activities;</li> </ul>
<p style="text-align: center;"><b>Planning and Implementing the Company’s Commercial and Business Strategies</b></p>	<ul style="list-style-type: none"> <li>1. Management of affairs with business partners and suppliers;</li> <li>2. Performing strategic planning activities</li> </ul>

<p><b>Ensuring legal, technical and commercial-business security of the Company and related persons doing business with the Company</b></p>	<ol style="list-style-type: none"> <li>1. Pursuing legal formalities;</li> <li>2. Planning and implementing operational activities required to ensure compliance of the Company's operations with the company procedures and applicable legislation;</li> <li>3. Providing information to competent authorities as a requirement of the applicable legislation;</li> <li>4. Creating and monitoring visitor records;</li> <li>5. Planning and implementing emergency management processes;</li> <li>6. Performance of legal procedures about the Company and shareholders;</li> <li>7. Planning and implementing the Company's audit activities;</li> <li>8. Planning and implementing internal audit and investigation processes;</li> <li>9. Planning and implementing occupational health and safety processes;</li> <li>10. Ensuring security of the Company's premises and facilities;</li> <li>11. Planning and implementing the Company's production and operational risk processes;</li> <li>12. Ensuring security of the Company's office stock and resources;</li> </ol>
<p><b>Performance of operational processes by the relevant business functions in connection with the design and implementation of social responsibility and civil society activities that are performed by the Company</b></p>	<ol style="list-style-type: none"> <li>1. Planning and implementing social responsibility and civil society activities;</li> </ol>
<p><b>Planning and implementing activities required for offering products and services of the Company upon customization of them based on the relevant persons' preferences, patterns of use and needs</b></p>	<ol style="list-style-type: none"> <li>1. Planning and implementing customer satisfaction activities</li> </ol>

### 2.3. Categories of Personal Data

The Company processes your personal data categorized below in accordance with the conditions of personal data processing that are specified in the Law and applicable legislation:

CATEGORIZATION OF PERSONAL DATA	DESCRIPTION
<b>Identification Information</b>	Any information about identity of a person which is provided in driving licence, identification card, certificate of residence, passport, attorney ID, marriage certificate, etc.
<b>Contact Information</b>	Information such as telephone number, address, e-mail, etc. that is used to contact the data subject.
<b>Customer Information</b>	Information generated and obtained about the relevant persons as a result of business activities and operations performed by our business functions.
<b>Information on Family Members and Relatives</b>	Information on family members and relatives of the data subject that is processed in connection with the products and services we offer or for the purpose of protecting legal interests of the data subject
<b>Customer Transaction Information</b>	Information such as records on the use of our products and services and demands and instructions of the customers that are required for the use of products and services.
<b>Security Information About Physical Spaces</b>	Records such as camera records, finger print records and documents taken during entry to physical spaces or while staying inside the physical space.
<b>Transaction Security Information</b>	Your personal data processed to ensure technical, administrative, legal and commercial security during the performance of commercial activities
<b>Financial Information</b>	Personal data processed in connection with any information, document and record that shows financial results created based on the legal relationship established between the Company and data subject
<b>Prospective Employee Information</b>	Personal data processed in connection with individuals who submit an application to work for our Company or are considered as prospective employee based on human resources requirements of the company in accordance with business practices and principles of good faith or are in employment relationship with our Company.
<b>Legal Action and Compliance Information</b>	Personal data processed to determine, pursue our legitimate receivables and rights, perform our obligations and comply with our legal liabilities and policies of the company
<b>Audit and Inspection Information</b>	Personal data processed for the purpose of compliance with the Company's legal liabilities and company policies
<b>Special Categories of Data</b>	Personal data related with race, ethnic origin, political view, philosophical view, religious sect and other beliefs, clothing style, association, foundation or union membership, health, sexual preferences, criminal convictions and security measures as well as biometric and genetic data are special categories of personal data.

<b>Inquiry/ Complaint Management Information</b>	Personal data related with the receipt and processing of any inquiry or complaint submitted to the Company
<b>Risk Management Information</b>	IP information and information processed for the management of commercial, technical and administrative risks.

### 3. PRINCIPLES AND CONDITIONS ON PROCESSING OF PERSONAL DATA

#### 3.1. Principles on Processing of Personal Data

The Company processes your personal data in accordance with the principles of processing personal data that are specified in Article 4 of the Law. It is compulsory to comply with these principles in any personal data processing activity:

- **Processing of personal data in accordance with the law and principle of good faith:** The Company acts in accordance with the laws, subordinate legislation and general principles of law while processing your personal data, and attaches importance to processing the personal data in a manner limited with the objective of processing and in consideration of data subjects' reasonable expectations.
- **Personal data should be accurate and up-to-date:** Attention is paid to perform necessary checks in order to ensure that your personal data processed by the Company is up-to-date. Data subjects are granted right to request correction or deletion of inaccurate and obsolete data.
- **Processing of personal data for a specific, clear and legitimate purpose:** The Company determines objectives of data processing before each data processing activity and ensures that these objectives are in compliance with the law.
- **Personal data should be related, limited and proportionate with the purpose of processing:** The Company limits data processing activity with the personal data necessary to achieve the objective of collecting, and takes necessary steps to preventing processing of personal data that is not related with that purpose.
- **Personal data should be stored for a period required under the applicable legislation or for the purposes of processing:** The Company deletes, destroys or anonymizes the personal data upon expiry of the duration specified in the applicable legislation or once the purpose of processing personal data becomes invalid.

#### 3.2. Conditions on Processing of Personal Data

The Company processes your personal data in the presence of one of the conditions of processing personal data that are specified in Article 5 of the Law. Explanations are provided below in connection with these conditions:

- **Explicit consent of data subject:** In case other conditions of personal data processing are not in place, the Company may process personal data of data subject when the data subject provides consent based on free will, upon obtaining adequate information on personal data processing activity, without leaving room to any suspicion and limited to solely the processing activity in question.
- The Company may process personal data without explicit consent of the data subject **in case personal data processing activity is clearly required under the laws.** In this case, the Company will process personal data in accordance with the applicable legal regulation.
- In case **it is not possible to obtain explicit consent of data subject due to actual impracticability and it is compulsory to process personal data**, the Company will process the personal data of the data subject who is not able to give explicit consent or whose consent cannot be honoured as a



valid consent when processing of personal data is compulsory in order to protect life or physical integrity of data subject or any third person.

- In case ***personal data processing activity is directly related with execution or performance of an agreement***, personal data processing activity will be performed if it is required to process personal data of parties to the agreement that is drawn up or already signed between data subject and the Company.
- The Company processes personal data for the purpose of performing legal obligations specified in the applicable legislation in case ***personal data processing activity is compulsory for the data controller to comply with its legal obligation***.
- The Company may process personal data without explicit consent of data subjects, limited with the purpose of making public in case ***personal data of data subject is made public***, disclosed to the public by the data subject and opened to information of all members of the public.
- The Company may process personal data of data subject without explicit consent of data subject in case ***it is compulsory to process personal data for establishing, exercising or protecting a right***.
- In case, ***data processing is compulsory for legitimate interests of the data controller***, the Company may process personal data subject to the condition of overseeing the balance of interests between the Company and data subject ***provided that fundamental rights and freedoms of data subject is not overridden***. For this purpose, firstly, the Company determines the legitimate interest obtained as a result of processing activity in case of processing based on legitimate interest. The Company assesses potential impact of the personal data processing on rights and freedoms of data subject and performs the processing activity in case it is concluded that the balance is not disturbed.

### **3.3. Conditions on Processing Special Categories of Personal Data**

Article 6 of the Law specifies special categories of personal data in a limited manner. These are personal data related with race, ethnic origin, political view, philosophical view, religious sect and other beliefs, clothing style, association, foundation or union membership, health, sexual preferences, criminal convictions and security measures as well as biometric and genetic data.

The Company may process the special categories of personal data in the following cases provided that additional measures are taken as described by the Personal Data Protection Board:

- ***Processing of special categories of personal data other than data on health and sexual preferences***: processing is performed in case data subject gives explicit consent or processing is clearly required under the laws.
- ***Personal data on health and sexual preferences*** may be processed by persons subject to confidentiality obligation or competent organizations and institutions without obtaining explicit consent of the data subject, for the purpose of protecting public health, providing preventive medicine, diagnosis, treatment and care services, and planning and managing healthcare services and financing.

## **4. TRANSFER OF PERSONAL DATA**

The Company may transfer personal data in the country or abroad in the presence of conditions for transferring personal data, in accordance with the additional requirements specified in Articles 8 and 9 of the Law and determined by the Personal Data Protection Board.

- ***Transfer of personal data to third persons in the country***: The Company may transfer your personal data in the presence of at least one of the data processing conditions described in Articles 5 and 6 of the Law and Article 3 of this Policy, provided that fundamental principles on processing of data are complied with.

- Transfer of personal data to third persons abroad:** The Company may transfer your personal data to foreign countries (countries where Microsoft Teams servers are hosted) in the presence of at least one of the data processing conditions described in Articles 5 and 6 of the Law and Article 3 of this Policy, provided that fundamental principles on processing of data are complied with. In case country of transfer is not one of the secure countries announced by the Personal Data Protection Board, the Company may transfer personal data to third persons abroad in case the Company and data controller in the relevant country provide written guarantee on adequate level of protection, Personal Data Protection Board permits the transfer and at least one of the data processing conditions (see Article 3 in this Policy) is in place as specified in Articles 5 and 6 of the Law.

The Company may transfer data to parties categorized in the table below in accordance with general principles of the Law and data processing conditions in Articles 8 and 9 of the Law.

CATEGORIZATION OF DISCLOSED PARTY	SCOPE	PURPOSE OF TRANSFER
<b>Business Partner</b>	Parties acting as business partners in the course of the Company's business activities	Limited disclosure of personal data in order to ensure achievement of the business partnership's objectives
<b>Supplier</b>	Parties that provide services aimed at maintaining business activities of the Company based on an agreement made with the Company and instructions received from the Company.	Transfer limited with receipt of services outsourced from suppliers
<b>Subsidiaries</b>	Subsidiaries of the Company	Transfer of personal data limited with the purpose of performing business activities that require participation of subsidiaries
<b>Public Entity Authorized under the Law</b>	Public organizations and institutions that are legally authorized to require information and documents from the Company	Transfer of personal data limited with the purpose of information required by the competent public organizations and institutions
<b>Private Entity Authorized under the Law</b>	Entities subject to private law that are authorized to require information and documents from the Company	Transfer of personal data limited with the purpose of request made by the concerned entities subject to private law
<b>Subcontractor</b>	Parties that undertake the portion within the field of expertise depending on the type of activities conducted by the Company	Limited transfer for legal proceedings

## 5. INFORMING DATA SUBJECTS AND RIGHTS OF DATA SUBJECTS

It is required to provide information to data subjects in connection with the processing of personal data before processing of personal data or latest at the moment of processing personal data in accordance with Section 10 of the Law. Internal structure has been formed to ensure that information is provided to data subjects in each personal data processing activity performed by the Company as data controller in accordance with the relevant article. For this purpose:

- Please see article 2.2 of the Policy for information on the purpose of processing your personal data.
- Please see article 4 of the Policy for information on parties who are transferred your personal data and purpose of transfer.
- Please see articles 3.2 and 3.3 of the Policy for information on conditions for processing of your personal data collected through various channels in physical or electronic environments.
  - As personal data subjects, we hereby declare that you are entitled to the following rights, set forth under Article 11 of the Law: **learn whether your personal data are being processed,**
  - ; To request information if your personal data have been processed,
  - ; To learn the purpose of the processing of your personal data and whether they have been used accordingly,
  - ; To learn which third parties domestic or abroad your personal data has been transferred to,
  - To request rectification in case your personal data has been processed incompletely or inaccurately and to demand the operations in this regard be reported to third parties your personal data has been transferred to,
  - To demand the erasure or destruction of your personal data in the event that the reasons for the processing no longer exist even though it was processed in accordance with the Law and other relevant provisions and to demand the operations in this regard be reported to third parties your personal data has been transferred to,
  - To object to negative consequences to you that are concluded, as a result of analysis of the processed personal data through solely automatic systems,
  - To demand compensation for the damages that you have suffered as a result of an unlawful processing of your personal data.

You may submit your applications concerning your above-listed rights by using [Turcas Petrol Anonim Şirketi Data Subject Application Form](#) that is accessible at the Company's Website. Depending on the nature of your request, your application will be concluded as soon as possible, and within 30 days at the latest, and in principle, free of charge. However, if the process requires additional costs, a fee may be demanded according to the tariff determined by the Personal Data Protection Board. During processing of applications, firstly, the Company determines whether the applicant is the legitimate holder of the right in question. In addition, the Company may require detailed and additional information as deemed necessary for better understanding of the application.

The Company will respond applications of data subjects in writing or electronically. Data subject will be explained reasons of rejection in case application is rejected.

In case personal data are not obtained directly from the data subject, the Company carries out activities on informing the data subjects (1) within a reasonable period of time upon obtaining the personal data; (2) during initial communication in case personal data are intended to be used for

communication with data subjects; (3) latest at the moment of initial transfer of personal data if the personal data are transferred.

## **6. DELETION, DESTRUCTION, ANONYMIZATION OF PERSONAL DATA**

The Company deletes, destroys or anonymizes the personal data at its own discretion or upon request of the data subject in accordance with Article 7 of the Law and the guidelines published by the Authority in case reasons of processing are no longer valid even though personal data are processed in accordance with the legislation.

## **7. EXCLUSIONS ON THE SCOPE AND IMPLEMENTATION OF THE LAW**

The following events are excluded from the scope of the Law:

- Processing of personal data by real persons solely for the purpose of activities related with the data subjects and family members in the same household provided that data are not disclosed to third persons and obligations on data security are complied with.
- Processing of personal data for official statistics, and researches, planning and statistical purposes upon anonymization.
- Processing of personal data for art, history, literature and science or within the scope of the freedom of speech provided that such processing does not lead to an offence or national defence, national security, public security, public order, economic security, privacy or any personal right is not breached.
- Processing of personal data within the scope of preventive, protective actions and intelligence activities taken and performed by public organizations and institutions authorized and assigned under the law, for the purpose of establishing national defence, national security, public security, public order or economic security.
- Processing of personal data by judicial authorities or execution authorities in connection with investigation, prosecution, litigation or execution proceedings.

The Company is not obliged to inform data subjects and data subjects shall not be entitled to exercise rights specified in the Law, other than the right to claim compensation of losses in case:

- It is required to process personal data for prevention of crime or investigation of a crime.
- Processing is related with personal data that is made public by the data subject.
- It is required to process personal data for the purpose of a disciplinary investigation or action, and performance of audit or regulatory duties by competent and assigned public organizations and institutions and professional organizations classified as public organization.
- Processing of personal data is required for protection of national economic and financial interests in case of matters related with budget, taxation and finance.

## ANNEX-1 DEFINITIONS

DEFINITION	
<b>Explicit Consent</b>	Consent given with free will upon being informed about a certain matter.
<b>Anonymization</b>	Process of removing personally identifiable information related with an identified or identifiable real person even when data are matched with the other data.
<b>Employee</b>	Real persons working for the Company.
<b>Prospective Employee</b>	A real person who is not employee of the Company but has the status of prospective employee of the Company.
<b>Personal Health Data</b>	Any health information related with an identified or identifiable real person.
<b>Personal Data</b>	Any information related with an identified or identifiable real person.
<b>Data Subject</b>	A real person of whom personal data are processed.
<b>Processing of Personal Data</b>	Any processing activity performed on the data such as obtaining personal data by fully or partially automatic means or non-automatic means that are part of a data registration system; recording, storage, revision, modification, disclosure, transfer, taking the transfer of data, rendering the date obtainable, classification or prevention of use.
<b>Law</b>	Personal Data Protection Law No. 6698 that has been promulgated in the Official Gazette No. 29677 of April 7th, 2016.
<b>Special Categories of Personal Data</b>	Data related with race, ethnic origin, political view, philosophical belief, religion, religious sect or other beliefs, clothing style, association, foundation or union membership, health, sexual preferences, criminal convictions and security measures as well as biometric and genetic data.
<b>Policy</b>	Turcas Petrol Anonim Sirketi Personal Data Processing and Protection Policy
<b>Company/ Turcas</b>	Turcas Petrol Anonim Şirketi
<b>Business Partners</b>	Persons with whom a partnership is established in accordance with contractual relations in the course of the Company's business activities.
<b>Data Subject</b>	A real person of whom personal data are processed
<b>Data Processor</b>	A real or legal person that processes personal data for and on behalf of the data controller based on the authorization made by the data controller.
<b>Data Controller</b>	Person who determines objectives and means of personal data processing and manages the media where data are stored in a systematic manner.