

POLICY FOR DATA PROTECTION AND PROCESSING

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POLICY FOR DATA PROTECTION AND PROCESSING

1. PURPOSE AND SCOPE OF THE POLICY

DOĞANLAR YATIRIM HOLDİNG A.Ş. PERSONAL DATA PROTECTION AND DATA PROCESSING POLICY ("Policy") is designed to specify terms and conditions regarding ongoing data processing operations of DOĞANLAR YATIRIM HOLDİNG A.Ş. ("**Doğanlar Yatırım Holding A.Ş.**") and protection of processed personal data.

Personal data protection was guaranteed in the constitution with an amendment in 2010 including a clause annexed to the 20th article, and it was decreed that the terms and conditions of personal data protection were to be legally arranged. In this respect, Law no. 6698 on Personal Data Protection became effective on 07.04.2016. Doğanlar Holding conducted necessary internal studies to raise awareness on personal data protection, first and foremost a Constitutional right, and accorded its internal organization with the personal data protection regulation, to turn it into a company policy.

This Policy has the objective to be guiding regarding Doğanlar Holding implementations as envisaged in the personal data protection law and in related regulations.

2. DEFINITION OF TERMS

EXPLICIT CONSENT	Expressed informed consent on a certain matter based on free will.
ANONYMIZE	Rendering personal data not associable with a real person whose identity is or can by no means be disclosed even when coupled with other data.
PERSONAL DATA OWNER	Real person whose personal data is processed. For instance; clients, employees.
PERSONAL DATA	All information regarding a real person whose identity is or can be specified.
PRIVATE PERSONAL DATA	Data on race, ethnic origin, political opinion, philosophical belief, religion, religious order or other beliefs, clothes; association, foundation or trade union membership, health, sexual life, conviction, and safety measures, or biometric or genetic data are deemed private.
PERSONAL DATA PROTECTION	All data processing operations including personal data collection, partially or in their entirety, through automatic or non-automatic means, via access to a data registry system; personal data recording, storing, keeping, amending, rearranging, explaining,

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	transferring, receiving, rendering transferable, classifying or preventing the use thereof.
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DATA PROCESSOR	Real or legal bodies processing personal data based on the authority granted by data supervisor.
DATA SUPERVISOR	Real or legal bodies specifying purposes and means of personal data processing, responsible for establishing and managing data registry systems.
Personal Data Protection Law	The Law no. 6698 on Personal Data Protection

3. WHERE TO RECORD PERSONAL DATA

Personal data is processed by Doğanlar Holding via below recording environments.

- Browsers
- Extractable memories (USB, Memory card etc.)
- Information security devices (firewall, daily log files, antivirus etc.)
- Personal computers
- Optical disks (CD, DVD etc.)
- Printer, scanner, photocopy machines
- Software programs (office software, software of state institutions)
- Mobile devices (phone, tablet etc.)
- Non-electronic written, printed, visual environments

4. GROUPS OF EMPLOYEES AND CANDIDATES

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4.1. Personal Data Collection for the Group of Candidates

Doğanlar Holding can process below information of candidates making job applications;

- CV, job experience, education,
- Name surname, Identity No., Place and date of birth, Civil state, Photo, Gender,
- Phone, Address, E-mail (contact information),
- Entrance and exit registries and camera recordings,
- Recording of information collected in case of face-to-face or online interviews via teleconference, video call, mobile phone.
- References or information collected through surveys conducted by Doğanlar Holding •Expected salary.

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4.2. Personal Data Collection for the Group of Employees

Doğanlar Holding processes below information of its employees working for the company on business contract or relation;

- CV, photo, job experience, education, diploma, certificate, Professional Competence Certificate, Psycho Teknik, SRC4, SRC2 Certificates, E and G Driving License,
- Name Surname, Identity No, Identity Serial No, Mother's name, Father's name, Place and date of birth, civil status, religion, blood type, signature, photo, registered city, town, district, village, volume no. family serial no. gender, Criminal Record,
- Phone number, address, e-mail address, phone number of a preferred relative (contact information),
- References or information collected through surveys conducted by Doğanlar Holding,
- Expected salary, payment method etc.,
- Criminal record, health report (Chest radiography, Eye check-up report, Ear Audiometry, Hepatitis Test, Pulmonary Function Test), Enforcement Proceedings

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- Military service registry, SGK [Social Security Office] service scheme,
- Financial data, camera recording, information on business trips, location data
- Vehicle allocation info., personal accident insurance, work uniform size, private health insurance data.

4.3. Purpose of Data Collection and Processing for the Group of Candidates

Doğanlar Holding processes personal data of job candidates for below purposes based on the content of the application;

- To assess candidate's qualifications, job experience, interest and suitability for the open position,
- If necessary, to check the accuracy of the information disclosed by the candidate, or contact third parties to assess his/her references,
- To contact the candidate regarding application or recruitment process, or, if available, to contact him/her for a future position,
- To cover the requirements of a regulation or requests of authorized institution or corporation,
- To improve and ameliorate Doğanlar Holding's recruitment principles,
- To executive operations regarding occupational health and safety.

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4.4. Purpose of Data Collection and Processing for the Group of Candidates

Doğanlar Holding processes personal data of its employees for below purposes:

- To improve and ameliorate Doğanlar Holding's job contract principles,
- To manage emergency situations,
- To conduct ethical audits,
- To manage human resources processes,
- To cover the needs of authorized public institutions in case of potential disaccord or possible incidents,
- To conduct legal obligations regarding employee recruitment,

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- To open salary accounts for the staff, allocate leased automobiles, mobile phones, mobile phone lines, food cards, when necessary, and conduct automatic individual pension transactions,
- To monitor health condition of employees required for the envisaged job,
- To monitor salary confiscation of employees,
- For healthy supply and audit of Doğanlar Holding's quality, information security and confidentiality policies and standards,
- To organize business trips,
- To contact relatives of employees whose contact information was provided by the employee in case of emergency,
- To monitor and detect entrance and exit times,
- To prepare reports and analysis for higher management,
- To conduct operations regarding software, corporate resource planning, reporting, marketing etc.,
- To conduct performance assessment and specify salary policies,
- To record camera footage for security and safety implementations at work,
- To cover the requirements specified in laws and regulations (tax regulation, social security regulation, code of obligations, commercial laws and regulations, occupational health and safety laws and regulations, regulation on electronic communication etc.,
- To execute operations regarding occupational health and safety.

4.5. Personal Data Collection and Processing Methods for Employees and Candidates

Personal data of candidates are collected via other methods and means specified in this Policy or alongside below methods and means during the recruitment phase:

- Written or online application form,
- CV of candidates forwarded to Doğanlar Holding via e-mail, references or similar methods,

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- Through recruitment or consultancy companies, İşkur, HR sites or LinkedIn,
- Controls conducted to check the accuracy of information forwarded by candidates, and surveys conducted by Doğanlar Holding.

Doğanlar Holding processes collected personal data automatically or non-automatically via computational systems or human resources staff.

4.6. Study on the References of Candidates

Doğanlar Holding may conduct a study on the references of candidates with the information forwarded by them via filling out related boxes in the application form. The study on the references of the candidates aims to confirm the accuracy of information submitted by them. Another purpose of the study can be to detect information obscured by candidates which might cause risks for Doğanlar Holding.

Doğanlar Holding authority has the liability to inform references to be contacted as part of the study. Vital information such as identity, job and education experience of candidates might be disclosed to third parties as part of this study. Personal data on candidates can also be disclosed by third parties. Candidates can at any time contact Doğanlar Holding regarding this study.

4.7. Personal Data Rights of Employees and Candidates

Candidates who would like to make use of their rights resulting from the 11th article of Law no. 6698 on Personal Data Protection ("KVKK") can make an application to Doğanlar Holding within the scope of the terms and conditions specified in this Policy.

4.8. Personal Data collected during the Term of Candidacy which will continue to be processed in case of Recruitment

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All personal data on candidates collected and processed during the recruitment process are transferred to the employee file of the candidate in case s/he is recruited.

4.9. Personal Data Security of Employees and Candidates

Doğanlar Holding makes no discrimination among groups of individuals (candidate, employee, intern) when it comes to personal data security. Detailed information on personal data security is included in the chapter of this document on personal data security.

5. CLIENT

5.1. Collected Personal Data of Clients

Although services provided by Doğanlar Holding for clients might vary according to product or commercial activity, below personal data collected by Doğanlar Holding through online or offline written or oral means are processed by Doğanlar Holding during the term of product or service procurement:

- Name and surname, phone number, e-mail address, postal address (contact information), voice recording, video recording, job information,
- Customer requests, suggestions and customer audit reports.

5.2. Purpose of Client Personal Data Collection and Processing

Doğanlar Holding processes personal data of clients for below purposes with respect to the business relation it has with the client and services the client makes use of:

- To conduct accounting and financial processes, collect and confirm payment,
- To assess suggestion and request forms voluntarily filled out by clients, and improve its business transactions,
- To duly execute services for the client, and take physical safety measures

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5.3. Methods of Client Personal Data Collection and Processing

Personal data of clients can be collected in line with the methods and means specified in this Policy, alongside below methods and means during the interview and/or assessment phase:

- Online or offline written and oral means; via e-mail, written petition/suggestion-request forms.

5.4. Clients' Personal Data Rights

Clients who aspire to make use of their rights resulting from the Law no. 6698 on Personal Data Protection can make an application to Doğanlar Holding within the scope of the terms and conditions specified in this Policy.

6. PRINCIPLES ON PERSONAL DATA PROCESSING

Doğanlar Holding is sensitive towards the protection of personal data, and deems it a corporate policy, acting in line with below basic principles upon the matter.

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6.1. Processing in accordance with the Law and the Rule of Honesty

It acts in accordance with legal principles on personal data processing and the common-sense principle of honesty.

6.2. Guaranteeing the accuracy and, if necessary, currency of personal data

Periodical audits and upgrades are conducted to keep processed personal data of related groups of individuals accurate and up-to-date, and necessary measures are taken upon this matter. In this respect, Doğanlar Holding builds systems capable of confirming the accuracy of personal data, and make necessary arrangements.

6.3. Data processing for clear, concise and legitimate purposes

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Personal data are processed based on clear, concise and legitimate purposes. Below includes detailed information on the purpose of data processing.

6.4. Restrictive and measured data processing in line with the designated purpose

Personal data are processed in a restrictive and measured manner in line with the designated purposes/objectives, and it must be avoided to process personal data not related to the implementation of the purposes.

6.5. Storing data for the period designated by related regulations or required by the designated purpose

Doğanlar Holding can keep personal data only as long as it is specified in related regulations or required for the fulfillment of the designated purpose. In this respect, it must at first be specified whether related regulations envisage a time limit to keep personal data; if so, personal data shall be kept during this period; if not, personal data shall be kept for a period of time sufficient to fulfill the purpose of data collection. In case the time expires or conditions requiring data processing become invalid, and if there is no further legal ground to continue their processing, personal data are purged or anonymized in line with Doğanlar Holding Policy to Keep and Purge Personal Data.

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7. CONDITIONS RULING PERSONAL DATA PROCESSING OF THE TWO GROUPS OF INDIVIDUALS

Explicit consent of related groups of individuals is but one reason for the legal compliance of personal data processing. Personal data can still be processed in case of any one of the below legal compliance reasons other than explicit consent.

The ground for personal data processing might be but one of the below legal compliance reasons, while the existence of more than one of these conditions can be the grounds for the same personal data processing activity. In case processed personal data are private, below conditions entitled "Conditions to Process Private Personal Data" are applied.

POLICY FOR DATA PROTECTION AND PROCESSING

The groups of individuals are informed about the type of personal data processed within the scope of this Policy, for what purposes and reasons, which resources are used to collect personal data, with whom these personal data are shared, and how they are used.

7.1. When clearly envisaged in Laws

In case personal data processing is clearly envisaged in Laws, Doğanlar Holding processes can process personal data without explicit consent of the related groups. For instance, personal data processing for the purposes of commercial e-approval, order, payment, delivery, annulment or return of product in line with Law Regulating Electronic Commerce.

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7.2. When it is physically impossible to take explicit consent of the related party

In case it is mandatory to process personal data of an individual to protect his/her or someone else's life or bodily integrity, but it is physically impossible for him/her to give explicit consent or whose consent cannot be validated, personal data can be processed without explicit consent.

7.3. When directly related to contracting or executing an agreement

On condition that it is directly related to making or executing an agreement, personal data of parties can be processed, when necessary.

7.4. When abiding by the Legal Obligations of Doğanlar Holding

Personal data can be processed in case it is mandatory for Doğanlar Holding, as Data Supervisor, to fulfill its legal obligations.

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7.5. When making public personal data of the two groups

In case personal data of a group of individuals are personally made public by them, the data can be processed without explicit consent. For instance, personal data of a Member publicly shared online on social media accounts can be processed in proportion to the content of the post.

7.6. When data processing is necessary to preserve or protect a right

In case personal data processing is mandatory to preserve, exercise or protect a right, personal data can be processed without explicit consent. For instance, a Member's personal data put in the complaint file as part of a court case.

7.7. Personal data processing based on legitimate interest

In case it is mandatory for Doğanlar Holding to process data for its legitimate interest without damaging basic rights and freedoms of the group of individuals, personal data can be processed without explicit consent. For instance, customer satisfaction surveys conducted by Doğanlar Holding to improve customer satisfaction.

7.8. Personal data processing of the group of individuals based on explicit consent

In case personal data of the group of individuals cannot be processed on one of above grounds specified in article 5(2), explicit consent is required.

8. CONDITIONS FOR WHEN PRIVATE PERSONAL DATA CAN BE PROCESSED

Some of personal data are separately arranged as "private personal data", and are subject to special protection measures.

8.1. Private personal data processing based on explicit consent

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Private personal data can be processed with the explicit consent of the group of individuals upon taking administrative and technical measures specified in this Policy.

8.2. Conditions for when private personal data can be processed without explicit consent

Private personal data can be processed without explicit consent in below situations upon taking sufficient measures to be specified by the Personal Data Protection Board ("Board"):

- Private personal data other than data on health and sexual life of the group of individuals, can be processed in cases envisaged by law,
- Private personal data on health and sexual life of the group of individuals can only be processed by persons or authorized institutions responsible for the protection of public health, preventive medicine, medical diagnosis, treatment and medical care services, financial planning and management with health services that are under the obligation to keep the data as secret

9. INFORMING THE GROUP OF INDIVIDUALS

The related party is informed by Doğanlar Holding during personal data collection. In this respect, Doğanlar Holding informs the party about the purpose of data processing, with whom and for what purpose processed personal data can be shared, method of and legal grounds for personal data collection, and rights of data owners.

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In case the group of individuals request information regarding their personal data, they can contact Doğanlar Holding by sending an e-mail to kurumsal.iletisim@doganlarholding.com.tr e-mail address, or to the registered electronic mail address of the company doganlarholding@hs01.kep.tr' via a safe electronic signature or a mobile signature, or by making a written request to Kavacık Mah. Ertürk Sk. No: 3/1 İç Kapı No: 1 Beykoz / Istanbul address.

Doğanlar Holding Contact Person : Corporate Communication Department

10. CATEGORIZING PERSONAL DATA

Personal data of the groups of individuals are processed by Doğanlar Holding under below categories within the scope of this Policy:

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- Identity
- Contact
- Physical Space Safety
- Financial
- Personal information
- Information on candidates and employees
- Complaint management
- Web site visit

11. PURPOSES OF PERSONAL DATA PROCESSING

11.1. Conditions of data processing

Personal data are restrictively processed under below conditions.

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- When related activity regarding personal data processing is explicitly envisaged in Law,
- When personal data processing by Doğanlar Holding is directly related to or necessary for making or executing an agreement,
- When it is mandatory to process personal data for Doğanlar Holding to fulfill its legal obligations,
- When personal data are made public by the group of individuals, they can be restrictively processed by Doğanlar Holding,
- When it is mandatory to process personal data by Doğanlar Holding to preserve, exercise or protect rights of Doğanlar Holding or groups of individuals or a third party,
- When it is mandatory to process personal data by Doğanlar Holding to preserve its legitimate interests without damaging basic rights and freedoms of the group of individuals,
- When it is mandatory to process personal data by Doğanlar Holding to protect data owner's or someone else's life or bodily integrity, and it is physically impossible for the person to give explicit consent or when the explicit consent is legally invalid.

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In the absence of above conditions, Doğanlar Holding shall take explicit consent of data owners to process their personal data.

11.2. Conditions of data processing

Doğanlar Holding processes personal data for below purposes:

Candidate- Employee Group:

- Execute recruitment processes,
- Assess candidates,
- Compile personal information files,
- Make performance assessment,
- Assess whether the person is capable of fulfilling job requirements,
- Execute insurance etc. processes of persons working under a business contract,

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- To execute fringe benefits' processes, periodical health controls, entrance and exit operations,
- To execute remuneration processes,
- To conduct internal organizations,
- To organize domestic/international visits,
- To conduct legal criminal prosecution.

Client Group:

- To assess suggestion and request forms voluntarily filled by clients to improve its services.
- To duly execute technical services etc..

Public officer, administrative institution officer conducting the investigation or prosecution:

- To procure information and documents required for management of legal and administrative processes.
- To fulfill legal obligations.

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Online visitors:

- To abide by legal regulations.
- To log online visitor or user activities in the system.

Stakeholder/Partner:

- To procure information and documents required by management of legal or administration processes.

12. TRANSFER OF PERSONAL DATA TO FOREIGN OR DOMESTIC THIRD PARTIES

Personal data of the group of individuals can be transferred to third parties (third party companies, third party real persons) for processing purposes upon taking necessary security measures.

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12.1. Transfer of personal data

Personal data can be transferred to third parties in case conditions envisaged in the 8th and 9th articles of the Personal Data Protection Law are fulfilled.

Anonymized data of online visitors, their user behaviors and cookies are collected in the web site, and can be shared.

12.2. Third parties receiving personal data and the purpose of transfer

Personal data can be transferred to below groups of individuals:

- Business partners (Independent auditors, contracted insurance companies),
- Followers of company's social media accounts (photos and videos taken with the explicit consent of people during company celebrations and events can be shared),
- Shopping mall management,
- Legally authorized public corporations and institutions,
- Legally authorized real legal persons (company lawyer/ legal consultant, company physician).

Personal data is transferred for below purposes:

- To improve and ameliorate principles of Doğanlar Holding business contract,
- For the employees to benefit from health promotions (blood donations, contracts with private hospitals etc.),
- To manage emergency situations,
- To cover the requirements of authorized public corporations or institutions in case of possible disaccord or juridical cases,
- To conduct performance assessment and specify salary policies.

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13. PERSONAL DATA SECURITY

Proportional measures can be taken for personal data security to prevent risks of unauthorized access, accidental data losses, deliberate purge or damage of data.

All necessary technical and physical measures are taken to prevent parties other than authorized persons to have access to personal data. In this respect, especially the authorization system is established in a way to prevent people from having access to more personal data than necessary. Private personal data, such as health data, are subject to even more strict personal data protection measures.

Authorized persons go through required security checks. Furthermore, they are also trained about their tasks and liabilities.

Personal data access logs are kept as long as it is technically possible, and they are periodically monitored. Any unauthorized access is subject to immediate investigation.

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Doğanlar Holding abides by the following obligations to guarantee personal data security:

- To act in line with the principle of honesty and legal regulations on matters related to personal data protection,
- To conduct necessary studies to update overdated personal data,
- To inform related managers in case a legal violation regarding personal data processing is detected,
- To give necessary instructions for people to use their legal rights regarding their personal data.

14. LEGAL RIGHTS OF THE GROUP OF INDIVIDUALS AND HOW TO EXERCISE THEM

14.1. Personal data rights within the scope of Personal Data Protection Law

Below listed rights of the groups of individuals regarding their personal data are included in the 11th article of the Personal Data Protection Law:

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- To be informed on whether their personal data is processed,
- If so, to ask for information on this process,
- To be informed about the purpose of personal data processing, and whether their data is processed in accordance with this purpose,
- To be informed about the third parties who receive their personal data within the country or abroad,
- To ask for corrections, if their personal data are misprocessed or there are not fully logged.
- To ask for their personal data to be purged in accordance with the terms and conditions of related regulations,
- To ask for third parties receiving their personal data to be informed about the transactions envisaged in (d) and (e) clauses,
- To object undesired consequences of personal data analysis on exclusive automatic systems,
- To request damage recovery in case of being harmed due to illegal personal data processing.

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14.2. Terms regarding the use of personal data protection rights

Anyone requesting information regarding their personal data can contact Doğanlar Holding by sending an e-mail to kurumsal.iletisim@doganlarholding.com.tr e-mail address, or to the registered electronic mail address of the company doganlarholding@hs01.kep.tr via a safe electronic signature or a mobile signature, by making a written request to Kavacık Mah. Ertürk Sk. No: 3/1 İç Kapı No: 1 Beykoz / Istanbul address, or by filling in the Personal Data Protection Application Form on <https://www.doganlarholding.com.tr>. Your applications will be responded within 30 days at the latest.

15. ENFORCEMENT AND UPDATABILITY

This Policy is deemed operational as of the date of publication. The Policy can be updated in accordance with changing conditions and regulations. You will be informed about possible updates on <https://www.doganlarholding.com.tr>