

PERSONAL DATA

PROTECTION, STORAGE AND DELETION POLICY

1. OBJECTIVE

The right of every individual to request the protection of personal data about himself is a right arising from the Constitution. As BTMCo, we consider fulfilling the requirements of this right as one of our most valuable duties. For this reason, we attach importance to the processing, protection, storage and destruction of your personal data in accordance with the law.

As a result of the importance we attach to personal data in this Policy, to determine the principles and procedures we apply while processing and protecting personal data, the personal data of our company employees, employee candidates, service providers, visitors and other third parties. The Constitution has been prepared in order to ensure that it is processed in accordance with international conventions, the Law on Protection of Personal Data No.6698 ("Law") and other relevant legislation, and that the relevant persons exercise their rights effectively.

2. SCOPE

Policy All personal data managed by BTMCo can be obtained, recorded, stored, preserved, changed, rearranged, disclosed, transferred, taken over, and made available through fully or partially automatic means or non-automatic means provided that it is a part of any data recording system. It covers all kinds of operations performed on data such as bringing, classifying or preventing their use.

The policy is related to all personal data of BTMCo partners, officials, customers, employees, supplier officials, employees and third parties.

BTMCo may change the Policy to comply with the legislation and the decisions of the Personal Data Protection Board and to better protect personal data.

3. DEFINITIONS

Abbreviation	Definition
Sending Group	The category of legal persons to whom personal data is transferred by the data controller.
Explicit Consent	Consent on a specific subject, based on information and declared with free will.
Anonymization	Making personal data unrelated to an identified or identifiable natural person under any circumstances, even by matching other data.

Related person	The natural person whose personal data is processed.
Related User	Except for the person or unit responsible for the technical storage, protection and backup of the data, they are the persons who process personal data within the organization of the data controller or in line with the authority and instruction received from the data controller.
Deletion	Deletion, destruction or anonymization of personal data.
Law / KVKK	Personal Data Protection Law No. 6698.
Data Saving System	Any medium containing personal data that is fully or partially automated or processed in non-automatic ways, provided that it is part of any data recording system.
Electronic Environment	Environments in which personal data can be created, read, modified and written using electronic devices.
Non-Electronic Environment	Other than electronic environment, all written, printed, visual, etc. other environments.
Personal Data	Any information relating to an identified or identifiable person.
Data Inventory	Personal data processing activities carried out by data controllers depending on the business processes; Explain the purposes and the reason for processing personal data, the maximum retention period required for the purposes for which the personal data is processed, the personal data foreseen to be transferred to foreign countries and the measures taken regarding data security, which are formed by associating with the data category, the recipient group transferred and the data subject group. They detail the inventory.
Personal Data Processing	Obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying personal data fully or partially automatically or by non-automatic means provided that they are part of any data recording system, or all kinds of operations performed on data, such as preventing their use.
Committee	The Personal Data Protection Committee established by BTMCo to manage the Policy and other related procedures and to ensure the enforcement of the Policy.
Board	Personal Data Protection Board.
Institution	Personal Data Protection Authority
Special Qualified Personal Data	Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data.

Periodic Deletion	The deletion, destruction or anonymization process specified in the personal data storage and disposal policy and to be carried out ex officio at repetitive intervals in the event that all the conditions for processing personal data included in the Law are eliminated.
Policy	Personal Data Protection, Storage and Deletion Policy
Data Processor	Person who processes personal data on behalf of the data controller based on the authority given by the data controller.
Data Officer	Real or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.

4. GENERAL PRINCIPLES

BTMCo checks the compliance of the data to be processed in the preparation phase of each new personal data processing workflow with the following principles. Work flows that are not found suitable are not implemented.

When BTMCo processes personal data;

- (a)** Complies with the law and good faith.
- (b)** Ensure that personal data are accurate and, when necessary, up to date.
- (c)** It takes care that the purpose of the processing is specific, clear and legitimate.
- (d)** Checks that the processed data is linked for the purpose of processing, that it is processed to the extent that it should be processed, and that it is measured.
- (e)** It preserves the data only as much as required by the relevant legislation or for the purpose of processing, and destroys it when the purpose of processing disappears.

5. DUTIES AND RESPONSIBILITIES

Personal Data Protection Committee has been established within BTMCo in order to manage this Policy and other related procedures regarding the processing of personal data and to ensure the enforcement of the Policy. The Committee is composed of the General Manager, Finance and Administrative Affairs Director, Sales Director, Marketing Manager, Accounting and Administrative Affairs Officer. The duties and responsibilities of the Commission are as follows.

- (a)** It normally meets every 6 months. It may be collected extraordinarily if circumstances require it (for example in the event of a possible data breach).
- (b)** Discusses the issues that need to be changed / improved in the policy.
- (c)** Determine the issues that can be fulfilled for the legal processing and protection of personal data.

- (d) The Commission determines the steps that can be taken to increase the awareness of KVKK within the company and before its business partners.
- (e) Identifies the risks that may be encountered regarding the processing and protection of personal data, and takes the necessary administrative and technical measures.
- (f) It maintains contact with the institution and manages the relations.
- (g) Evaluates the requests from the Related Person.
- (h) Follows periodic deletion processes.
- (i) It updates the Data Inventory.
- (j) Makes the assignments regarding the matters listed above.

6. DATA SAVING SYSTEM

Personal data are securely stored by our Company in the environments listed in the table below in accordance with the law..

Electronic Environment	Non-Electronic Environment
<ul style="list-style-type: none"> • Servers (Domain, backup, e-mail, database, web, file sharing, etc.) • Software (office software) • Information security devices (security wall, intrusion detection and prevention, log file.) • Personal computers (Desktop, laptop) • Mobile devices (phone, tablet, etc.) • Removable sticks (USB, Memory Card etc.) • Printer, scanner, copier • Security camera 	<ul style="list-style-type: none"> • Paper • Written, printed, visual media

7. EXPLANATIONS ON STORAGE AND DISPOSAL

By BTMCo; Personal data of the employees of third parties, institutions or organizations that are in contact as employees, employee candidates, visitors and customers are stored and destroyed in accordance with the Law. In this context, detailed explanations on storage and disposal are given below, respectively. 4.1 Explanations Regarding Storage The concept of

processing personal data has been defined in Article 3 of the Law, it is stated in Article 4 that the processed personal data should be related, limited and measured with the purpose for which they are processed, and should be kept for the required period foreseen in the relevant legislation or for the purpose for which they are processed, 5 and 6. In the articles, the processing conditions of personal data are listed. Accordingly, within the framework of our company's activities, personal data are stored for a period stipulated in the relevant legislation or in accordance with our processing purposes. According to this;

Personal Data Source	Time
Accounting And Financial Transactions	10 Year
Cookies and Logs	6 Months - Maximum 2 Years
Personal Data Regarding Customers	10 Years after the legal relationship ends.
Contracts	10 Years From Termination Of The Contract
Human Resources Processes	15 Years Since Termination Of Activity
Registration of Visitors and Meeting Users	2 Years From The End Of The Event
Data Stored within the Scope of Labor Law (For example, severance pay, notice indemnity, malpractice compensation, information that may be subject to compensation for violation of the principle of equal treatment, payroll records, annual leave days, etc.)	5 years from the termination of the business relationship
Data Regarding Personal File Stored Under Labor Law	10 years from the termination of the business relationship
Data That May Be Subject To Union Compensation From The Data Stored Under Labor Law (For example: Performance records, disciplinary penalties, termination documents etc.)	10 years from the termination of the business relationship
Data Collected within the Scope of Occupational Health and Safety Legislation (Ex: Employment health tests, health reports, OHS Trainings, Occupational Health and Safety activities records etc.)	10 years from the termination of the business relationship
Data kept within the scope of SGK Legislation (Ex: Employment declarations, premium / service documents etc.)	10 years from the termination of the business relationship
Pursuant to Labor Law: Responding to court / executive information requests regarding the employee	10 years from the termination of the business relationship
Information on Company Partners and Board Members (For example: Attendance and Dividend Payments etc.)	10 Year
Information on Company Partners and Board Members (Personal data in the share book)	Indefinite Due To The Obligation Of Keeping The Share Book
Scholarship payment / Employee Advance Payment	10 Year
Job Application / Internship Application / Data Regarding Candidate Applications If Application Is Not Accepted (For example: CV, Cover Letter, Application Form etc.)	6 Months
Data Processed in Accordance with Corporate Communication Activities for Employees (Ex: Participant List etc.)	10 years from the termination of the business relationship
Commercial Books to be kept in Accordance with Company Activities, Documents Created Based on	10 Year

Records in Commercial Books, Financial Statements etc. Personal Data Processed	
Data Processed According to General Assembly Transactions	10 Year
Personal Data Regarding the Establishment and Content of Contracts to which the Company is a Party	10 Year
Personal Data Processed in Contractual Relations (Ex: Company Official, Name Surname, Signature Circular etc.)	10 Years Following Termination of Contract
Personal Data Regarding Tax Registration	5 Year
Personal Data Processed with Documents such as Invoice / Expense Compass / Receipt to be Kept in Accordance with Tax Procedure Law	5 Year
Personal Data (Camera Records) Processed for Security Purposes by CCTV Cameras	90 Day
Records of Employees' Access to Media Containing Personal Data	10 Years Due To Be Subject To Business Cases With At Least 2 Years
Traffic Information Processed during the Usage of the Company Internet Network, Internet Login and Remote Connection (Ex: IP address, start and end time of the service provided, etc.)	2 Year
Personal Data Processed Due to Requirement of After Sales Service According to the Law No.6502 on the Protection of the Consumer (Ex: Product installation date, customer contact information)	15 Year
Personal data from Customer Information regarding the issuance of invoices that form the basis of commercial books and records in accordance with Article 82 of the TCC	10 Year
Customer Transaction Information (Records Regarding Customers' Demands / Complaints / Suggestions.)	10 Year

Personal Data is irreversibly deleted, destroyed and anonymized in accordance with the area where the data is stored, immediately and in any case, provided that it does not exceed 30 (thirty) days.

• 7.METHOD OF COLLECTING YOUR PERSONAL DATA, PURPOSE OF PROCESSING AND LEGAL REASON

Within the scope of the commercial and / or contractual relationship between you and BTMCo, within the framework of the following purposes and in accordance with Article 5 of Law No. 6698; your Personal Data within the scope of establishment and performance of the contract, fulfillment of legal obligations and legitimate interests; It can be collected and processed by BTMCo directly from you (such as contract, order form, offer form, e-mail correspondence, business card sharing, website messages and the shares of other business partners). During your visits to our workplaces, your image is recorded with a security camera for security reasons and is processed limited to this operation.

In addition, your identity and contact data on your business cards can be processed by archiving them on your business cards (the data on the business card is deemed to be publicized) shared by you at various events attended by BTMCo or group companies. The aim here is to establish a commercial relationship between the two companies and to operate the processes necessary for corporate communication.

Your Personal Data is processed for the following purposes: Generally for current Business Relationships;

- Execution of Goods / Service Purchase Processes
 - Execution of Activities in Compliance with Legislation
 - Finance and Accounting Transactions
 - Ensuring Physical Space Security
 - Follow-up and Execution of Legal Processes
 - Establishing a Commercial / Contractual Relationship and Conducting Transactions and Activities Within This Scope, To Fulfill Financial And Legal Obligations
 - Tracking of Requests / Complaints
 - Organization and Event Management,
 - Communication Activities
 - Fulfilling Legal Obligations
 - Providing Information to Authorized Institutions and Organizations
 - Preservation of your information that must be kept in accordance with the relevant legislation; copying and backing up in order to prevent loss of information; ensuring the consistency of your information; taking the necessary technical and administrative measures for the security of our databases and information
- **In General For Potential Business Relationships;**

Your identity and contact information directly obtained from you through your visits to our website, your requests and complaints conveyed to our call center, or the business cards you share at events (the data on the business card is deemed to be publicized.); It is processed within the scope of legitimate interest in accordance with Article 5/2 of the Law for establishing a commercial or contractual relationship, managing your requests and complaints and communication activities.

- **For Suppliers / Business Partners;**

Within the scope of the commercial relationship between you and our company, personal data belonging to your company officials and employees, specified in Article 5 of the Law; Establishment and execution of our contracts, fulfillment of legal obligations and legitimate interests of our company, in accordance with the basic principles stipulated in the Law and within the personal data processing conditions, within the scope of the following purposes.

- Execution of Activities in Compliance with Legislation
- Execution of Contract Processes
- Execution of Finance and Accounting Affairs
- Execution and Follow-up of Legal Processes
- Conducting Company Internal Operations
- Ensuring Physical Space Security
- Preservation of your information that must be kept in accordance with the relevant legislation; copying and backing up in order to prevent loss of information; ensuring the consistency of your information; taking necessary technical and administrative measures for the security of our databases and information.

- **For Visitors;**

Within the scope of your visits to our company, our website and other workplaces, in addition to ensuring the security of our company and you, as well as the fulfillment of our legal obligations and our legitimate interests, your visual data with security cameras in physical environments can be obtained within the scope of internet access provided to you during your visit to our workplace. Your identity and communication data may be processed for the following purposes.

- Conducting Audit and Security Activities
- Execution of Information Security Processes
- Ensuring Physical Space Security
- Providing Information to Authorized Persons, Institutions and Organizations
- Ensuring the Security of Data Supervisor Operations
- Providing Internet Access and Ensuring Access Security
- Fulfilling Legal Obligations

- **For Employee Candidates;**

Our company provides personnel recruitment by using your personal data received by you via our website www.btmco.com.tr, from our e-mail addresses, by mail or within the scope of job applications you have made to our company headquarters or by using the application forms you have filled in and stipulated in Article 5 of the Law for employment processes; It carries out data processing activities within the scope of the establishment and execution of our contracts and the legitimate interests of our Company for the following purposes.

- Execution of the Application Process of Employed Candidates
- Execution of Human Resources Operations and Especially Recruitment Processes,
- Carrying Out Business Continuity Activities And Providing Physical Space Security

- **For employees;**

BTMCo can create a personal file for the reasons arising from the relevant legislation, conclude a service agreement with you, establish and protect your rights within the scope of the relationship, and process data within the scope of BTMCo management right and legitimate interest for the following purposes. conducts the activity. In cases where explicit consent is required by law, process-based information and permission requests are also required.

- Execution of Information Security Processes
- Fulfilling Obligations Arising From Employment Contract And Legislation For Employees
- Execution of Benefits and Benefits Processes for Employees
- Conducting Audit / Ethical Activities
- Execution of Activities in Compliance with Legislation
- Execution of Finance and Accounting Affairs

- Ensuring Physical Space Security
- Following and Execution of Legal Affairs
- Planning of Human Resources Processes
- Execution / Supervision of Business Activities
- Conducting Occupational Health / Safety Activities
- Receiving and Evaluating Suggestions for the Improvement of Business Processes
- Conducting Business Continuity Activities
- Execution of Performance Evaluation Processes
- Providing Information to Authorized Persons, Institutions and Organizations
- Execution of Management Activities
- Realizing Required Legal Notifications to Official Institutions, Benefiting from Incentives Before Official Institutions, Notifying Relevant Authorities within the Scope of Official Institutions Audits
- Execution of Human Resources Operations and Personnel Activities,
- Ensuring Employee Control and Performing Necessary Data Processing Activities Within the Scope of Employer's Management Right

6. MEASURES TAKEN FOR DATA SECURITY

BTMCo takes all necessary technical and administrative measures to prevent unlawful processing of personal data, to prevent unlawful access to personal data, and to ensure the appropriate level of security in order to preserve personal data.

6.1. Technical Measures

- (a)** Network security and application security are provided.
- (b)** Security measures within the scope of procurement, development and maintenance of information technology systems are taken.
- (c)** Current firewall systems are used.
- (d)** Necessary security measures are taken regarding the entry and exit of physical media containing personal data.
- (e)** The security of environments containing personal data is ensured.
- (f)** Personal data are backed up and the security of backed up personal data is also ensured.
- (g)** User account management and authorization control system is implemented and their follow-up is also carried out.
- (h)** Log records are kept without user intervention.
- (i)** Intrusion detection and prevention systems are used.
- (j)** Encryption is done.

(k) The security of personal data stored in the cloud is ensured.

(l) Secure encryption / cryptographic keys are used for private personal data and managed by different units.

6.2. Administrative Measures

(a) There are disciplinary regulations that include data security provisions for employees.

(b) Training and awareness activities on data security are periodically conducted for employees.

(c) Institutional policies on access, information security, use, storage and disposal issues have been prepared and implemented.

(d) Confidentiality commitments are made.

(e) An authority matrix has been created for employees.

(f) Employees who have a job change or leave their job are removed from authority in this area.

(g) Signed contracts contain data security provisions.

(h) Personal data security policies and procedures have been determined.

(i) Personal data security is monitored.

(j) Personal data are reduced as much as possible.

(k) Periodic and / or random inspections are carried out and made in-house.

(l) Protocols and procedures for security of special quality personal data have been determined and implemented.

7. Rights of Related Person Regarding Personal Data

The person concerned can make a request by applying BTMCo on the following issues:

(a) Learning whether their personal data is being processed,

(b) To request information regarding personal data if they have been processed,

(c) Learning the purpose of processing personal data and whether they are used appropriately for their purpose,

(d) Learning about the third parties to whom personal data has been transferred domestically or abroad,

(e) To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data have been transferred,

(f) To request the deletion, destruction or anonymization of personal data in the event that the reasons requiring its processing disappear, even though it has been processed in accordance

with the provisions of the KVKK and other relevant laws, and to request notification of the transaction made within this scope to third parties to whom their personal data are transferred,

(g) To object to the emergence of an unfavorable result by analyzing the processed data exclusively through automated systems,

(h) To request the compensation of the damage in case of damage due to the processing of your personal data illegally.

8. VIOLATION NOTIFICATIONS

BTMCo employees report to the Committee the work, action or event they think violates the provisions of the KVKK and / or the Policy. The committee convenes after this violation notification, if it deems necessary, and creates an action plan regarding the violation.

If the violation has occurred through the unlawful acquisition of personal data by others, the Committee notifies the relevant person and the Board within 72 hours within the scope of the Board's decision dated 24.01.2019 and numbered 2019/10.

9. CHANGES

The changes on the policy are prepared by the Committee and submitted to the BTMCo General Manager for approval. The Updated Policy can be sent to employees via e-mail or posted on the website.

10. EFFECTIVE DATE

This version of the Policy has been approved by the General Manager on 09/09/2020 and entered into force.