

# PARK ELEKTRİK ÜRETİM MADENCİLİK SANAYİ VE TİCARET ANONİM ŞİRKETİ

# PERSONAL DATA PROTECTION AND PROCESSING POLICY

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Prepared by	PARK ELEKTRİK ÜRETİM MADENCİLİK SANAYİ VE TİCARET A LPPD Compliance and Implementation Committee	NONİM ŞİRKETİ
Version	3.0. (Date of Update: 01.07.2023)	
Approved by	PARK ELEKTRİK ÜRETİM MADENCİLİK SANAYİ VE TİCARET A LPPD Compliance and Implementation Committee	NONİM ŞİRKETİ
In case of any discrepand Turkish text shall prevail.	I cy between the original Turkish version of the Policy and a translated v	ersion thereof, the

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#### 1. PURPOSE OF PREPARATION OF THE POLICY

Our Company PARK ELEKTRİK ÜRETİM MADENCİLİK SANAYİ VE TİCARET A.Ş. acts as the data controller, with the awareness of the importance of the privacy and security of personal data obtained within the scope of the Law No. 6698 on the Protection of Personal Data (LPPD) and other relevant legislation. It aims to ensure that the requirements for compliance with the Law No. 6698 on the Protection of Personal Data and the relevant legislation are fulfilled properly and a data protection and processing policy at international standards is established.

Our Company's Policy on the Protection of Personal Data (**Policy**) is set forth in line with the principles of lawfulness, objective good faith and clarity adopted by the Company in the protection and processing of personal data.

Due to our Company's capacity as data controller, the basic principles we take as basis in the processing of personal data are included in this Policy. Our Company does not compromise on basic principles and acts with maximum compliance determination during personal data processing activities. It establishes the personal data processing processes through the Personal Data Inventory in accordance with particularly the Turkish Constitution, LPPD and the relevant legislation. These data are processed in compliance with particularly the provisions of LPPD and other relevant legislation and as specified in this Policy.

#### 2. SCOPE

This Policy covers all personal data of natural persons described as a "data subject" in LPPD and the relevant legislation, which are processed either by automatic means or by non-automatic means provided that they are part of a data recording system.. The channels through which the personal data of data subjects reach our Company, the method of collection of the personal data reaching through these channels, obtained on the basis of data subjects, the legal ground for the collection, the purposes of processing and the parties to which they are disclosed are included in the Information Texts and Express Consent Texts presented to the data subjects in detail.

#### 3. DEFINITIONS

Anonymization	:	The process of rendering it impossible for personal data to be
-		associated with any identified or identifiable natural person in any
		way, even by matching with other data.
Explicit Consent	:	The process where the person whose personal data will be
•		processed (data subject) gives his/her consent to the processing
		after having been informed before the relevant operation is
		performed.
Information Text	:	Explanations to the data subject about the purpose for which the
		personal data will be retained, how long the personal data will be
		retained, by which method the personal data are collected, how the
		personal data are preserved and whether the personal data will be
		disclosed to third parties.
Presidency	:	Presidency of Personal Data Protection Authority
Inventory	:	The inventory where data controllers give details of their personal
Inventory	:	The inventory where data controllers give details of their personal data processing activities which are carried out according to their
Inventory	:	·
Inventory	:	data processing activities which are carried out according to their
Inventory	:	data processing activities which are carried out according to their business processes, the purpose and legal ground for/on which they
Inventory	:	data processing activities which are carried out according to their business processes, the purpose and legal ground for/on which they process personal data, the maximum period of retention of personal data necessary for the purposes of processing them, which is determined based on the data category, data subject group and the
Inventory	=	data processing activities which are carried out according to their business processes, the purpose and legal ground for/on which they process personal data, the maximum period of retention of personal data necessary for the purposes of processing them, which is
Inventory	Ξ	data processing activities which are carried out according to their business processes, the purpose and legal ground for/on which they process personal data, the maximum period of retention of personal data necessary for the purposes of processing them, which is determined based on the data category, data subject group and the recipient group the personal data are transferred to, the personal data envisaged to be transferred to foreign countries, and the
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Inventory  Data Subject	:	data processing activities which are carried out according to their business processes, the purpose and legal ground for/on which they process personal data, the maximum period of retention of personal data necessary for the purposes of processing them, which is determined based on the data category, data subject group and the recipient group the personal data are transferred to, the personal data envisaged to be transferred to foreign countries, and the



Processing	:	The processes of saving, storing, preserving, modifying, editing,
3		describing, transferring, receiving, making available and classifying
		personal data as referred to in Article 3 of LPPD
Law/LPPD	:	The Law on the Protection of Personal Data
Personal Data	:	Any information relating to an identified or identifiable natural person.
- oroman Batta	-	For example; name and surname, Turkish ID No., e-mail, address,
		date of birth, bank account number, etc. Thus, processing of the
		information in relation to legal persons is outside the scope of LPPD.
Processing of Personal Data	:	All kinds of operations carried out on the data, such as obtaining,
3		saving, storing, preserving, modifying, editing, describing,
		transferring, receiving, making available, classifying or blocking the
		use of personal data automatically, completely or in part, or non-
		automatically provided that they constitute a part of any data
		recording system.
Board	:	Personal Data Protection Board
Authority	:	Personal Data Protection Authority
Special Categories of Personal		Data related to race, ethnicity, political opinions, philosophical
Data		opinions, religion, sect or other beliefs, appearance; association,
		foundation or trade union memberships; health, sexual life, criminal
		convictions and security measures, and biometric and genetic data
VERBIS	:	Information system, created and managed by the Presidency, which
		can be accessed via the Internet and will be used by data controllers
		for applying to register with the Registry and other transactions
		related to the Registry
Data Processor	:	Natural or legal person processing personal data on behalf of the
		data controller, based on the authority granted by the data controller
Data Controller	:	Natural or legal person who determines the purposes and means of
		the processing of personal data, and who is responsible for
		establishment and management of the data recording system
Data Controllers' Registry	:	The Data Controllers' Registry kept by the Presidency
Data Controller Contact Person	:	The natural person notified by the data controller, during registration
		with the Registry, for the communications to be established with the
		Authority regarding the obligations of the legal persons residing in
		Türkiye and the representative of a legal person data controller not
		residing in Türkiye, within the scope of the Law and secondary
		regulations to be enacted based on this Law.
Erasure	:	Erasure of personal data, the process of rendering personal data
		inaccessible to and non-reusable by relevant users in any way
		whatsoever.
Destruction	:	Destruction of personal data, the process of rendering personal data
		inaccessible to, non-restorable and non-reusable by anybody in any
		way whatsoever.

#### 4. DATA SUBJECTS WHOSE PERSONAL DATA ARE OBTAINED

The table of Data Subjects whose personal data are obtained and processed by our Company is given below, and the area of implementation and scope of this Policy is limited to the data subjects listed in this table. Requests of the data subjects out of the scope of these definitions will also be processed by our Company under LPPD and the relevant legislation.

Employee Candidate	:	Natural Persons who have made a Job or Internship Application to Our Company and/or made available their resumes and/or Relevant Information for review by our Company
Reference	:	The Person whose Opinion is sought about the Employee Candidates
		in the Hiring Process



Reference Person	:	Former Employee giving his/her Explicit consent for Reference
		Approval
Employee	:	Person working in our Company under Employment Contract
Employee's Relative	:	Family Members of the Employee
Emergency Contact Person	:	The Person notified to our Company by the Employees, to be called in
		case of Emergency
Corporate Customer's Employee	:	Employee of our corporate customer making use of our products or
		services
Shareholder/Partner	:	Natural person shareholder of our Company
Person Filling In the Contact Form	:	The persons who fill in the contact form available on our website
Business Partner's Official	:	Natural person officials of our business partners that are in the position
		of business partner in in the provision of products or services offered
		by our Company to its customers
Authorized Signatory	:	Our Company's Authorized Signatories
Members of the Board of Directors	:	Natural Person who is a Member of the Board of Directors of our
		Company
Consultant's, Supplier's and	:	Shareholders, Employees and Officials of the Entities with which our
Business Partner's Official,		Company is in a Business Relationship, from which it procures
Shareholder, Employee		Service, with which it cooperates, in any manner, and/or Natural
		Person Supplier
Custodian/Guardian/Representative	:	Natural Person authorized to represent a Person by the Authorization
		for Custodianship, Guardianship, or Power of Attorney
Visitor	:	Natural Persons who have visited the Premises of Our Company
Guest	:	Natural persons accessing our Company's hotspot Internet sharing
Third Parties	:	Natural Persons whose Images are Recorded through CCTV but
		whose Identity Information is Unknown
Person Making Call	:	Person Calling and Contacting Our Company by Phone

#### 5. BASIC PRINCIPLES IN THE PROCESSING OF PERSONAL DATA

Our Company meets the general principles and conditions contained in the legislation in regard to the protection and processing of personal data and acts in accordance with the below-listed principles in order to ensure that personal data are processed in conformity with the Constitution and LPPD; and at the same time, our activities are carried on by our employees in compliance with these principles, with a high awareness in the Company's practices.

#### 5.1. Prohibition of processing of personal data in principle

With the awareness that processing of personal data is prohibited in principle, the Company processes the same only based on the following reasons, solely within the limits prescribed by the legislation:

#### a. Existence of the personal data subject's explicit consent

One of the conditions for the processing of personal data is the explicit consent of the personal data subject. The explicit consent of the personal data subject should be given in relation to a specific matter, on the basis of being informed and of his/her own free will. The data are processed within the scope of the data subject's explicit consent and for the purposes specified in the explicit consent. As a rule, there is no need to obtain the express consent of the personal data subject in the presence of the conditions set forth in sub-paragraphs b, c, d, e, f, g and h of this article.

#### b. Being expressly provided for in laws

In case it is expressly provided for in the law, the personal data of the data subjects are processed in accordance with the law. In cases where data processing is permitted by the law, data are processed limited to the reasons and data categories set out in the relevant law.



#### c. Inability to obtain explicit consent of the data subject because of de facto impossibility

Personal data of the data subject may be processed in case it is mandatory to process personal data in order to protect the life or physical integrity of an individual or another person where the individual is incapable of giving explicit consent or the individual's consent cannot be recognized as valid because of de facto impossibility.

#### d. Direct relationship with conclusion or performance of a contract

Personal data may be processed where processing of personal data pertaining to parties to a contract is necessary provided that it is directly related to conclusion or performance of the contract (on the condition that the person whose data will be processed on the basis of conclusion or performance of the contract is one of the parties to the contract).

#### e. Fulfillment of a legal obligation

Personal data of the data subject may be processed where processing of data is mandatory for the Company to fulfill its legal obligations.

#### f. Data subject's making his/her personal data public

If the data subject makes his/her personal data public, such personal data may be processed, limited to the purpose of making it public.

#### g. Where data processing is mandatory for the establishment, exercise or protection of a right

Personal data of the data subject may be processed in case data processing is mandatory for establishing, exercising or protecting a right.

#### h. Where processing of data is mandatory due to legitimate interests

If processing of data is mandatory for the legitimate interests of our Company, personal data of the data subject may be processed, provided that the fundamental rights and freedoms of the personal data subject are not infringed.

In case the data processed are included in the special categories of personal data as defined in LPPD; if there is no express consent of the personal data subject, personal data may be processed only in the following cases, provided that adequate measures to be determined by the Board are taken:

#### 5.2. Lawfulness and compliance with the rule of objective good faith

Our Company processes personal data lawfully and in compliance with the rule of objective good faith pursuant to Article 4 of LPPD and aims to balance the conflicting interests by observing "justified interests". Clarity and honesty are taken as basis in informing, clear information is given about the intended use of the personal data collected and the data are processed within this framework.

### 5.3. Being limited to and in connection with the processing purposes, and compliance with the principle of proportionality

Our Company determines the purposes for which it will process the data of the data subject, in line with his/her express consent. In this context, it proportionately refrains from processing personal data that is not related to the purpose of processing or is not needed, and the data required during data processing activities is collected at a minimum level.

#### 5.4. Ensuring that the personal data are accurate and, if necessary, up-to-date

Our Company ensures that the personal data it processes are accurate, respects the statements of the data subject for this, and receives confirmation of their up-to-datedness when necessary.



#### 5.5. Processing of personal data for specific, clear and legitimate purposes

Our Company collects and processes personal data for legitimate and lawful reasons. Our Company processes personal data in connection with the activities it carries out, in a reasonable manner and to the extent necessary, and retains them for the period required by the relevant legislation or necessary for the purpose for which they are processed.

#### 5.6. Principle of data security

With the awareness of the advancement speed of technology, our Company knows that ensuring the security of your personal data is not limited to legal methods and that security measures backed by technology should be taken as well. In this context, all necessary measures are taken to ensure the data security.

#### 5.7. Principle of data minimization

The principle of data minimization refers to the collection and processing of data in a manner that is adequate, relevant and limited to only the data required for the purpose of collection and processing.

#### 6. PERSONAL DATA COLLECTION CHANNELS

Our Company may collect the personal data of data subjects mentioned in Article 4 of this Policy, **verbally, in writing or electronically, by automated or non-automated methods**. In this context, the processes for obtaining personal data are given below. Data subjects are informed in accordance with the relevant legislation, based on the channels of obtaining personal data.

Meeting hiring and employment	:	Personal data obtained from employee candidates for employment in
needs		our Company are processed. This process involves the period elapsed
		until the conclusion of the employment contract.
Conclusion and Performance of	:	Personal data are processed in the process of signing employment
the Employment Contract		contract with the employees and during its performance.
Calls received by the telephone	:	Information pertaining to data subjects, such as their names,
central		surnames and telephone numbers, are processed through the calls
		received by our Company's telephone central.
Conclusion and performance of	:	Personal data of natural persons are processed within the scope of the
the contracts		contracts signed by our Company.
The process of conclusion and	:	The personal data obtained from natural and legal persons in the
performance of contracts with		process of supply of services and products are processed, so as to
suppliers and business partners		enable the sustainability of commercial activities.
Security services	:	Personal data obtained from persons who come to our premises for
		visiting purposes are processed.
Digital communication domains	:	Personal data of data subjects are processed through digital
		communication channels such as the contact form on our website and
		our info email address.

#### 7. TYPES OF THE PERSONAL DATA OBTAINED

Personal data obtained by our Company from the data subjects specified in this Policy, data categories, collection channels, processing purposes and legal grounds for processing are set out in detail in the data subject information text taking notice of also the third parties to whom the personal data are transferred and the purposes of transfer. In case of a change in the personal data obtained from data subjects, the Inventory and VERBİS records are updated.

#### 8. OBLIGATION TO INFORM

Our Company informs the data subjects who are the owners of the personal data it obtains while carrying out its activities, before obtaining or at the latest during obtaining personal data, pursuant to Article 10 of LPPD.



The information required to be communicated to the data subjects within the framework of the said obligation to inform is outlined below.

- Identity of the data controller and, if applicable, its representative,
- The purpose for processing of personal data,
- To whom and for what purposes the personal data processed may be transferred,
- Method of and legal grounds for collection of personal data,
- Other rights of the data subject listed in Article 11 of LPPD.

Our Company has prepared information texts to be presented to the data subjects under the foregoing LPPD provision, on the basis of the process and the persons whose data are processed, so as to fulfill its obligation to inform. Following presentation of the information texts to the data subjects, action is taken by obtaining the explicit consent statements also for the data processing activities and data categories requiring the receipt of explicit consent of the data subject in order for our Company to carry out its commercial activities.

### Within the framework of Article 28(1) of LPPD, our Company is under obligation to inform in the following cases:

- In case personal data are processed by natural persons in the context of the activities merely related to those real persons or related to their family members staying at the same house, provided that the data are not transferred to third parties and that the data security-related obligations are complied with,
- In case personal data are processed as part of official statistics and for the purposes such as research, planning and statistics through anonymization,
- In case personal data are processed for the purposes of art, history, literature or science or in the context of the freedom of expression, provided that the data do not violate the national defense, the national security, the public safety, the public order, the economic security, the privacy of private life or personal rights or that they do not constitute an offense,
- In case personal data are processed in the context of preventive, protective and intelligence-related activities carried out by public institutions and organizations to which the laws make the assignment and grant the authorization for ensuring the national defense, the national security, the public safety, the public order or the economic security,
- In case personal data are processed by judicial or execution authorities in relation to investigation, prosecution, judicial or execution proceedings.

### Within the framework of Article 28(2) of LPPD, our Company's obligation to inform is not applicable in the following cases:

- In case personal data processing is necessary to prevent commission of an offense or necessary for a criminal investigation,
- In the case of processing of personal data made public by the data subject,
- In case personal data processing is necessary for the assigned and competent public institutions and organizations and public professional organizations to carry out supervision or regulatory duties or to conduct disciplinary investigations and prosecutions, by virtue of the authorization granted by the laws,
- In case data processing is necessary for the protection of the State's economic and financial interests related to budgetary, taxation and financial matters.

#### 9. POLICY ON SPECIAL CATEGORIES OF PERSONAL DATA

In line with the Personal Data Protection Board's Decision no. 2018/10 of 31/01/2018 on the Adequate Measures to be taken by Data Controllers for the Processing Special Categories of Personal Data, special categories of personal data are protected by our Company, taking special security measures. In this context, a Policy on Special Categories of Personal Data has been prepared and put in place in our Company.



As regards special categories of personal data, Article 6 of the Law is as follows:

- (1) Data related to race, ethnicity, political opinions, philosophical opinions, religion, sect or other beliefs, appearance; association, foundation or trade union memberships; health, sexual life, criminal convictions and security measures, and biometric and genetic data are special categories of personal data.
- (2) Processing of special categories of personal data without the explicit consent of the data subject is prohibited.
- (3) Personal data, except for data concerning health and sexual life, listed in the first paragraph may be processed without seeking explicit consent of the data subject, in the cases provided for by laws. Personal data concerning health and sexual life may only be processed, without seeking explicit consent of the data subject, by the persons subject to secrecy obligation or competent public institutions and organizations, for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing.
- (4) Adequate measures determined by the Board shall be also taken while processing the special categories of personal data.

The rules adopted by our Company in the protection and processing of special categories of personal data are set forth in line with the principles of lawfulness, objective good faith and clarity. The **Access Authorization Matrix** has been prepared for our Company in order to monitor the security of special categories of personal data and the authorization for access to the channels where these data are processed.

#### 10. RIGHTS OF THE PERSONAL DATA SUBJECT

Under Article 11 of LPPD, each data subject has the right to apply to our Company in its capacity as data controller, for the following issues:

- (1) Each data subject has the right, by applying to the data controller, to:
- a) learn whether or not their personal data are processed,
- b) request for relevant information, if their personal data have been processed,
- c) learn the purposes of processing their personal data and whether or not those data are used in compliance with the purposes,
- ç) know the third parties in the Country or abroad, to whom their personal data are transferred,
- d) request for rectification in case their personal data have been processed incompletely or inaccurately,
- e) request for erasure or destruction of their personal data within the framework of the conditions stipulated by Article 7 of the Law No. 6698,
- f) request that the operations carried out under the sub-paragraphs (d) and (e) be notified to the third parties to whom their personal data are transferred,
- g) object to occurrence of any results that are to their detriment through analysis of their processed data exclusively by automated systems,
- ğ) request for compensation of the damages in case they incur damages due to the unlawfully processing of their personal data.

#### 11. METHOD OF EXERCISE OF THE RIGHTS BY THE PERSONAL DATA SUBJECT

Pursuant to Article 13/1 of LDDP and under the Communiqué on the Principles and Procedures for the Request to Data Controller, published in the Official Gazette issue no. 30356 dated 10.3.2018; the applications to be made to our Company, the data controller, with regard to such rights, should be submitted in writing or through other methods determined by the Personal Data Protection Board ("Board").

The "Data Subject" may notify our Company of his/her rights and requests set forth in sub-paragraph A.. In this context, the data subject may apply in writing in order to exercise all other rights available to him/her in accordance with Article 11 of the Law No. 6698 on the Protection of Personal Data, as follows:

- Through application in person by the applicant,
- By mail with the signature declaration attached,
- Through a notary public,



- · With secure electronic signature,
- By signing with a secure electronic signature defined in the name of the applicant and sending it to the KEP address specified below,
- By sending from the email address previously notified to the data controller by the data subject and registered in the data controller's system.

#### The following must be contained in the application:

- Name, surname, and signature if the application is in writing,
- Republic of Türkiye ID number for Turkish citizens, and nationality, passport number, or identity number, if any, for foreigners,
- Residential or business address convenient for notifications.
- Electronic mail address, telephone and fax numbers for notifications, if any,
- Subject of the request,
- Information and documents concerning the matter.

In written applications, the date when the document is served upon the data controller, or its representative shall be taken as the application date.

In the applications made through other methods, the date when the application is received by the data controller shall be taken as the application date.

The application shall be concluded on a free-of-charge basis, within the shortest time possible depending on the nature of the request, but in any event within no later than thirty days. However, if the relevant transaction requires an additional cost, the fee set out in the tariff determined by the Board may be collected.

The applications should be made by the individual himself/herself. An application may only be made on behalf of another person through a power of attorney, provided that it contains the authority to request for information within the scope of LPPD. **Our Company** may request the relevant verification information if it suspects of the identity of the applicant.

#### 12. CONTACT INFORMATION

Trade Name: PARK ELEKTRİK ÜRETİM MADENCİLİK SANAYİ VE TİCARET ANONİM ŞİRKETİ Head Office Address: Sultantepe Mahallesi Paşalimanı Caddesi, No:41, Üsküdar/ İstanbul Contact Link and E-mail address: <a href="https://kwkw.parkelektrik.com.tr">kvkk@parkelektrik.com.tr</a> / <a href="https://www.parkelektrik.com.tr">www.parkelektrik.com.tr</a> / <a href="https://www.parkelektrik.com.tr">www.parkelektrik.com.tr</a>

#### 13. MEASURES TAKEN FOR PROTECTION OF PERSONAL DATA

In accordance with Article 12 of LPPD, the necessary administrative and technical measures are taken for the purpose of ensuring the prevention of unlawful processing of and access to the personal data processed by our Company and the preservation of the personal data securely, and our Company conducts and/or procures the conduct of the necessary inspections in this context. While measures conforming to the nature of the personal data are being taken, special categories of personal data are protected with more stringent security measures.

#### 14. STORAGE AND RETENTION OF PERSONAL DATA

The personal data obtained by our Company are stored securely in physical or electronic mediums during the suitable time period so that our Company can carry on its activities. Within the scope of these activities, our Company acts in compliance with the obligations regarding the protection of personal data as stipulated in all relevant legislation, LPPD being in the first place.

If the legislation does not stipulate a period of time for retention of personal data, personal data are retained for a period determined by considering the following criteria and destroyed at the expiration of this period. Thus, after the period expires, personal data are erased, destroyed or anonymized.



Pursuant to the relevant legislation, with the exception of the circumstances where personal data are allowed or made obligatory to be retained for a longer period, the personal data shall be deleted, destroyed or anonymized in case the purposes of processing of the personal data cease to exist or it is requested by the data subject.

In case of erasure of personal data through the said methods, these data shall be destroyed such that they cannot be used and retrieved in any way. However, in cases where the data controller has a legitimate interest, personal data may be retained, although the purpose of processing ceases to exist and the periods specified in the relevant laws expire, until the expiration of the general limitation period (ten years) set forth by the Code of Obligations, provided that it does not harm the fundamental rights and freedoms of the data subjects. Employee data shall be retained for a period of 15 years following the end of the contract, under the Labor Law and the Occupational Safety Legislation. Following the expiration of the said limitation periods, the personal data shall be erased or destroyed provided that these operations are recorded as per the procedures contained in the **Retention and Destruction Policy**.

#### 15. TRANSFER OF PERSONAL DATA TO PERSONS IN THE COUNTRY

Our Company diligently abides by the conditions stipulated in LPPD in regard to sharing of the personal data with third parties, without prejudice to the provisions laid down in other laws.

In this framework, personal data are not transferred by our Company to third parties without the explicit consent of the data subject. However, in case of existence of any of the following conditions as stipulated by LPPD, our Company may also transfer the personal data without obtaining the explicit consent of the data subject.

- Where expressly provided for in laws;
- In case it is mandatory to process personal data in order to protect the life or physical integrity of an individual or another person where the individual is incapable of giving explicit consent or the individual's consent cannot be recognized as valid because of de facto impossibility,
- Where processing of personal data pertaining to parties to a contract is necessary provided that it is directly related to conclusion or performance of the contract,
- Where processing of data is mandatory for the data controller to fulfill its legal obligations,
- Where the data subject makes his/her personal data public,
- Where data processing is mandatory for establishing, exercising or protecting a right,
- Where processing of data is mandatory for the legitimate interests of data controller, provided that the fundamental rights and freedoms of the personal data subject are not infringed.

Provided that adequate measures are taken, your personal data may be transferred without obtaining explicit consent, in case it is provided for in laws with regard to special categories of personal data other than those related to health and sexual life, and for the following purposes with regard to special categories of personal data related to health and sexual life:

- Protection of public health,
- Preventive medicine,
- Medical diagnosis,
- Treatment and nursing services,
- planning and management of health-care services as well as their financing, etc.

In the transfer of special categories of personal data, the conditions specified under the processing conditions of these data are also complied with.

#### 16. TRANSFER OF PERSONAL DATA TO FOREIGN COUNTRIES

With regard to the transfer personal data to foreign countries, explicit consent of the data subject is sought in accordance with **Article 9 of LPPD**. However, in the presence of conditions permitting the processing of personal data, including special categories of personal data, without the explicit consent of the data subject, personal data may be transferred abroad by our Company without seeking the explicit consent of the data subject, provided that there is adequate protection in the foreign country to which the personal data will be transferred.



If the country to which the transfer will be made is not listed by the Board among the countries with adequate protection, our Company and the data controller/data processor in the respective country shall undertake the adequate protection in writing.

#### 17. EFFECTIVENESS AND IMPLEMENTATION

The personal data processing and protection policies of our Company shall be drawn up primarily within the framework of LPPD and other relevant legislation. In case all or certain articles of the Policy are updated, the updates shall take effect on the date of their publication. The Policy is published in its latest version on <a href="https://www.parkelektrik.com.tr/">https://www.parkelektrik.com.tr/</a>, the website of our Company. In case the provisions of the legislation are amended, our Company shall update the Policy from time to time by making amendments to the Policy. In case of any controversies between this Policy and the provisions of LPPD and other relevant legislation, provisions of LPPD and other relevant legislation shall prevail.

This Policy has been updated on 01.07.2023 and is assigned the Version Number 3.

