



ANADOLU GROUP

AG ANADOLU GRUBU HOLDİNG A.Ş. PERSONAL DATA PROTECTION AND PROCESSİNG POLİCY



Contents

1. PURPOSE AND SCOPE.....	ERROR! BOOKMARK NOT DEFINED.
2. POLICY PRINCIPLES.....	4
2.1. GENERAL PRINCIPLES	4
2.2. PERSON GROUPS COVERED BY THE POLICY	ERROR! BOOKMARK NOT DEFINED.
3. PRINCIPLES REGARDING THE PROCESSING AND PROTECTION OF PERSONAL DATA	5
3.1. COMPLIANCE WITH DATA PROCESSING CONDITIONS.....	5
3.1.1. COMPLIANCE WITH FUNDAMENTAL PRINCIPLES	ERROR! BOOKMARK NOT DEFINED.
3.1.2. COMPLIANCE WITH PERSONAL DATA PROCESSING CONDITIONS.....	ERROR! BOOKMARK NOT DEFINED.
3.1.3. COMPLIANCE WITH SPECIAL CATEGORIES OF PERSONAL DATA PROCESSING CONDITIONS.....	ERROR! BOOKMARK NOT DEFINED.
3.1.4. COMPLIANCE WITH PERSONAL DATA TRANSFER CONDITIONS	ERROR! BOOKMARK NOT DEFINED.
4. INFORMING DATA SUBJECTS	ERROR! BOOKMARK NOT DEFINED.
5. ADDRESSING THE REQUESTS OF DATA SUBJECTS.....	ERROR! BOOKMARK NOT DEFINED.
5.1. RIGHTS OF DATA SUBJECTS.....	ERROR! BOOKMARK NOT DEFINED.
5.2. CASES EXCLUDED FROM THE RIGHTS OF DATA SUBJECTS UNDER THE LEGISLATION .	ERROR! BOOKMARK NOT DEFINED.
6. ROLES AND RESPONSIBILITIES	ERROR! BOOKMARK NOT DEFINED.
6.1. HOLDING PERSONAL DATA PROTECTION (KVK) EXECUTIVE COMMITTEE	ERROR! BOOKMARK NOT DEFINED.
6.2. HOLDING KVK COMMITTEE.....	14
7. ENSURING THE SECURITY AND CONFIDENTIALITY OF PERSONAL DATA	16
8. PURPOSES OF PERSONAL DATA PROCESSING AND CATEGORIES OF PERSONAL DATA SUBJECT TO PROCESSING ACTIVITIES.....	ERROR! BOOKMARK NOT DEFINED.
8.1. PERSONAL DATA CATEGORIES.....	ERROR! BOOKMARK NOT DEFINED.
8.2. PURPOSES OF PERSONAL DATA PROCESSING	ERROR! BOOKMARK NOT DEFINED.
8.3. CATEGORIES OF SHARED PARTIES	ERROR! BOOKMARK NOT DEFINED.
9. CLOSE-CIRCUIT TELEVISION (CCTV) USAGE	ERROR! BOOKMARK NOT DEFINED.
10. WEBSITE USAGE.....	ERROR! BOOKMARK NOT DEFINED.
11. REVIEW	ERROR! BOOKMARK NOT DEFINED.
12. DEFINITIONS.....	ERROR! BOOKMARK NOT DEFINED.



1. Purpose and Scope

AG Anadolu Grubu Holding A.Ş. ("Anadolu Grubu Holding" or "Company") strives to comply with all applicable regulations regarding the processing and protection of personal data.

Within the framework of AG Anadolu Grubu Holding A.Ş.'s Personal Data Protection and Processing Policy ("Policy"), the principles adopted in the execution of personal data processing activities carried out by Anadolu Grubu Holding are outlined.

The purpose of this Policy is to ensure the sustainability of Anadolu Grubu Holding's principle of conducting "business activities in compliance with the law and rules of integrity, in transparency." In this context, the fundamental principles adopted for ensuring compliance with the provisions of the Personal Data Protection Law No. 6698 ("**KVKK**") regarding the data processing activities of Anadolu Grubu Holding are determined, and the practices implemented by Anadolu Grubu Holding are explained.

The Policy primarily applies to individuals whose personal data are processed by Anadolu Grubu Holding through automated means or non-automated means, provided that they are part of a data recording system. However, matters related to the protection of personal data of Anadolu Grubu Holding employees are separately regulated in the "AG Anadolu Grubu Holding A.Ş. Employees' Personal Data Protection and Processing Policy."



2. Policy Principles

2.1. General Principles

The Policy will be published on the Anadolu Grubu Holding website (www.anadolugrubu.com.tr) in a manner accessible to data subjects. In parallel with any changes and updates to the legislation, amendments to the Policy will be made available in an easily accessible manner for data subjects.

In the event of any contradiction between the applicable legislation on the protection and processing of personal data and this Policy, Anadolu Grubu Holding acknowledges that the provisions of the applicable legislation will prevail.

2.2. Person Groups Covered by the Policy

The groups of Data Subjects whose personal data are processed by Anadolu Grubu Holding under this Policy are as follows:

- **Job Applicants**

Individuals who have not yet established an employment contract with Anadolu Group Holding but have applied to Anadolu Grubu Holding with the intention of doing so.

- **Business Partners' Representatives and Employees**

Real person representatives, shareholders, and employees of organizations with which Anadolu Grubu Holding has a commercial relationship.

- **Holding Visitors**

Individuals who visit the buildings where Anadolu Grubu Holding operates or the websites operated by Anadolu Grubu Holding.



- **Other Real Persons**

All individuals who are not covered by the Anadolu Grubu Holding Employees' Personal Data Protection and Processing Policy.

3. Principles Regarding the Processing and Protection of Personal Data

3.1. Compliance with Data Processing Conditions

In carrying out personal data processing activities, Anadolu Grubu Holding complies with (i) the fundamental principles outlined in Article 4 of the KVKK, (ii) the personal data processing conditions specified in Article 5, and (iii) the conditions for processing special categories of personal data specified in Article 6.

3.1.1. Compliance with Fundamental Principles

(1) Processing Personal Data in Compliance with the Law and Integrity Principles

Anadolu Grubu Holding carries out personal data processing activities in accordance with the Constitution of the Republic of Turkey, the KVKK, and relevant secondary legislation, ensuring that these activities are conducted in compliance with the law and the principles of integrity

(2) Ensuring the Accuracy and Relevance of Processed Personal Data

While conducting personal data processing activities, Anadolu Grubu Holding takes all necessary administrative and technical measures, including the use of technical means, to ensure the accuracy and relevance of personal data. In this context, Anadolu Grubu Holding has established mechanisms to correct and verify the accuracy of personal data in cases where the data subjects' personal data is outdated or incorrect.



(3) Processing Personal Data in a Relevant, Limited, and Proportionate Manner

Personal data processed by Anadolu Grubu Holding is only processed to the extent necessary to achieve the purpose of processing, in connection with the data processing conditions. In this context, the purpose of personal data processing is determined before the processing activity begins, and data is not processed based on the assumption that it may be used in the future.

(4) Retaining Personal Data for the Duration Required by Relevant Legislation or the Purpose for Which They Were Processed

Anadolu Grubu Holding retains personal data only for the duration required by the relevant legislation or as necessary to fulfill the purpose of processing. In this regard, once the period specified in the legislation expires, or when the reasons for processing the personal data no longer exist, the personal data are deleted, destroyed, or anonymized by Anadolu Grubu Holding. Personal data are not stored based on the potential for future use.

3.1.2. Compliance with Personal Data Transfer Conditions

Anadolu Grubu Holding carries out personal data processing activities in accordance with the data processing conditions set out in Article 5 of the KVKK. In this context, personal data processing activities are carried out in the presence of the following personal data processing conditions:

(1) The Existence of the Data Subject's Explicit Consent

Personal data processing activities are carried out by Anadolu Grubu Holding when the Data Subject freely provides clear and informed consent regarding the processing of their personal data, with sufficient knowledge of the specific matter, without any ambiguity..



(2) The Personal Data Processing Activity is Clearly Foreseen by Law

When a personal data processing activity is explicitly regulated by law, Anadolu Grubu Holding may carry out the personal data processing activity, but only to the extent permitted by the relevant legal regulation.

(3) Inability to Obtain the Data Subject's Explicit Consent Due to Impossibility and the Necessity of Processing Personal Data

In cases where the Data Subject is unable to express consent or where their consent is not recognized as valid, and personal data processing is necessary to protect the life or physical integrity of individuals, Anadolu Grubu Holding will carry out the data processing activity within this scope.

(4) Personal Data Processing Activity is Directly Related to the Establishment or Performance of a Contract

When the processing of personal data is necessary for the establishment or performance of a contract, and is directly related to the parties of the contract, Anadolu Grubu Holding will carry out the data processing activity.

(5) The Necessity of Personal Data Processing to Fulfill Anadolu Grubu Holding's Legal Obligation

Anadolu Grubu Holding, which has adopted the principle of demonstrating the necessary sensitivity regarding legal compliance as part of its corporate policy, will carry out personal data processing activities when it is required to fulfill a legal obligation.

(6) The Data Subject's Disclosure of Their Personal Data

Personal data disclosed by the data subject (made public in any way) will be processed by Anadolu Grubu Holding in accordance with the purpose of its disclosure.



(7) The Necessity of Data Processing for the Establishment, Use, or Protection of a Right

When the processing of personal data is necessary for the establishment, use, or protection of a right, Anadolu Grubu Holding will carry out the personal data processing activity in alignment with this necessity.

(8) The Necessity of Personal Data Processing for Anadolu Grubu Holding's Legitimate Interests, Provided It Does Not Infringe on the Data Subject's Fundamental Rights and Freedoms

When the processing of personal data is necessary for the legitimate interests of Anadolu Grubu Holding, and provided that it does not harm the data subject's fundamental rights and freedoms, the data processing activity may be carried out. In this context, the balance between Anadolu Grubu Holding's legitimate interests as the "data controller" and the data subject's fundamental rights and freedoms will be considered.

3.1.3. Compliance with Special Categories of Personal Data Processing Conditions

Anadolu Grubu Holding places special emphasis on the processing of sensitive personal data. In this context, before processing sensitive personal data, Anadolu Grubu Holding first ensures that the necessary conditions for data processing are met with utmost care. After confirming the legality of the processing, the data processing activity is carried out.

Sensitive personal data may be processed by Anadolu Grubu Holding under the following conditions, provided that adequate measures determined by the Board are taken:

(1) Processing of Personal Health Data

Personal health data may be processed by Anadolu Grubu Holding under the following conditions, provided that (i) sufficient measures are taken as required by



the Ministry of Health, (ii) general principles are followed, and (iii) the obligation of confidentiality is maintained:

- The existence of the Data Subject's written explicit consent,
- Protection of public health,
- Preventive medicine,
- The provision of medical diagnosis, treatment, and care services,
- Planning and management of healthcare services and financing.

(2) Processing of Sensitive Personal Data Other Than Health and Sexual Life

Sensitive personal data, other than health and sexual life, may be processed by Anadolu Grubu Holding if the Data Subject gives explicit consent or in cases explicitly foreseen by law.

3.1.4. Compliance with Personal Data Transfer Conditions

Personal data transfers carried out by Anadolu Grubu Holding are conducted in accordance with the conditions for data transfer outlined in Articles 8 and 9 of the Personal Data Protection Law (KVKK).

(1) Transfer of Personal Data within the Country

In accordance with Article 8 of the Personal Data Protection Law (KVKK), Anadolu Grubu Holding conducts data transfer activities within the country in compliance with the data processing conditions (See Policy 3.1.).

(2) Transfer of Personal Data Abroad

In accordance with Article 9 of the Personal Data Protection Law (KVKK), personal data may be transferred abroad by Anadolu Grubu Holding under the following conditions: (i) in compliance with the data processing conditions (See Policy 3.1.), and (ii) if the country to which the data is being transferred is one of the countries with adequate protection as declared by the Board, or if there is no adequate protection in the foreign country, the data controllers in both Turkey and the foreign country must provide a written commitment to ensure adequate protection, and the transfer must be authorized by the Board.



(3) Groups of Persons to Whom Personal Data is Transferred by Anadolu Grubu Holding

In accordance with Articles 8 and 9 of the Personal Data Protection Law (KVKK), Anadolu Grubu Holding may transfer personal data of data subjects within the scope of this Policy (See Policy 2.2.) to the following groups of people for the specified purposes:

- (i) To Anadolu Grubu Companies, limited to the execution of commercial activities that require the participation of group companies,
- (ii) To third-party service providers processing personal data on behalf of Anadolu Grubu Holding, limited to the fulfillment of Anadolu Grubu Holding's commercial activities,
- (iii) To Anadolu Grubu Holding business partners, limited to the establishment and maintenance of the business partnership,
- (iv) To Anadolu Grubu Holding suppliers, limited to the fulfillment of Anadolu Grubu Holding's commercial activities,
- (v) To authorized public institutions and organizations, and authorized private legal entities, limited to the purposes requested by the data subjects within their legal authority,
- (vi) To third parties, in accordance with the conditions for the transfer of personal data.

4. Informing Data Subjects

Anadolu Grubu Holding, in accordance with Article 10 of the Personal Data Protection Law (KVKK), carries out the necessary processes to ensure that data subjects are informed during the collection of personal data. In this context, the clarification texts provided by Anadolu Grubu Holding to data subjects include, primarily, the following information:

- (1) The company's name
- (2) The purpose for which Anadolu Grubu Holding will process the data subjects' personal data,
- (3) To whom and for what purpose the processed personal data may be transferred,
- (4) The method and legal basis for collecting personal data,
- (5) The rights of the data subject listed below;



- Learn whether their personal data is being processed,
- Request information regarding the processing of their personal data if it has been processed,
- Learn the purpose of processing their personal data and whether it is used in accordance with its purpose,
- Learn the third parties to whom their personal data has been transferred, either domestically or internationally,
- Request correction if their personal data has been processed incompletely or incorrectly, and request that the correction be notified to third parties to whom the data has been transferred,
- Request the deletion or destruction of their personal data if the reasons for processing no longer exist, even if the data has been processed in compliance with the KVKK and other relevant laws, and request that this action be notified to third parties to whom the data has been transferred,
- Object to any result that is generated exclusively through automated processing of the data, which may affect the individual negatively,
- Request compensation for damages if they have suffered harm due to unlawful processing of their personal data.

5. Addressing the Requests of Data Subjects

If data subjects submit their requests regarding their personal data in writing to Anadolu Grubu Holding by providing identity verification documents and filling out the application form available on www.anadolugrubu.com.tr, Anadolu Grubu Holding, in its capacity as the data controller, will carry out the necessary processes to ensure that the request is concluded as soon as possible, and in any case, within thirty (30) days, in accordance with Article 13 of the KVKK, depending on the nature of the request.



An As part of ensuring data security, Anadolu Grubu Holding may request information to verify whether the person making the request is the owner of the personal data in question. Additionally, Anadolu Grubu Holding may ask the data subject further questions regarding their request to ensure that it is addressed appropriately.

If the data subject's request has the potential to infringe on the rights and freedoms of other individuals, requires disproportionate effort, or involves information that is publicly available, Anadolu Grubu Holding may reject the request with an explanation of the reasons.

5.1. Rights of Data Subjects

KVKK In accordance with Article 11 of the KVKK, you may make requests to Anadolu Grubu Holding regarding the following matters:

- (1) Learn whether your personal data is being processed,
- (2) If your personal data has been processed, request information about it,
- (3) Request the correction of your personal data if it has been processed incompletely or incorrectly, and request that the correction be communicated to third parties to whom your personal data has been transferred,
- (4) Request the deletion and destruction of your personal data, even if it has been processed in accordance with the KVKK and other relevant laws, when the reasons for processing no longer exist, and request that the actions taken be communicated to third parties to whom your personal data has been transferred,
- (5) Object to the result that emerges against you as a result of the processing of your data solely through automated systems,
- (6) Request compensation for any damage caused by the unlawful processing of your personal data.



5.2. Situations Outside the Rights of Personal Data Owners Required by Legislation

In accordance with Article 28 of the KVKK, personal data owners will not be able to exercise their rights in the following matters, as these situations are outside the scope of the KVKK:

- (1) The processing of personal data for artistic, historical, literary, or scientific purposes, or within the scope of freedom of expression, provided that it does not violate national defense, national security, public security, public order, economic security, privacy, or personal rights, or constitute a crime.
- (2) The processing of personal data for purposes such as research, planning, and statistics by anonymizing the data for official statistics purposes.
- (3) The processing of personal data by public institutions and organizations, authorized by law, for preventive, protective, and intelligence activities related to national defense, national security, public security, public order, or economic security.
- (4) The processing of personal data by judicial authorities or enforcement agencies in relation to investigations, prosecutions, trials, or execution procedures.

Pursuant to Article 28/2 of the KVKK, personal data subjects will not be able to assert their rights in the cases listed below, except for requesting the rectification of damages:

- (1) The processing of personal data being necessary for the prevention of a crime or for a criminal investigation.
- (2) The processing of personal data made public by the Data Subject.
- (3) The processing of personal data based on the authority granted by law for the purpose of carrying out supervisory or regulatory duties by public institutions and organizations or professional organizations with the nature of public institutions, or for the purpose of conducting disciplinary investigations or prosecutions.
- (4) The processing of personal data being necessary for the protection of the State's economic and financial interests regarding budget, taxation, and financial matters.



6. Roles and Responsibilities

6.1. Holding Personal Data Protection (KVK) Executive Committee

The Holding KVK Senior Committee is responsible for the implementation of the AG Anadolu Grubu Holding A.Ş. Personal Data Protection and Processing Policy in all activities and processes across Anadolu Grubu Holding. To fulfill this responsibility, the Holding KVK Senior Committee has established the Holding Personal Data Protection Committee within Anadolu Grubu Holding to ensure compliance with personal data protection regulations, its preservation, and maintenance. The Holding Personal Data Protection Committee, chaired by the Risk Management Coordination, consists of representatives from the Financial Affairs Department, Legal Affairs Department, Audit Department, Human Resources Department, Corporate Relations and Communication Coordination, and Information Technologies Coordination. The committee will prepare the necessary regulations and guidelines for compliance with KVKK across Anadolu Grubu Holding. All employees and units of Anadolu Grubu Holding are responsible for ensuring the implementation of and compliance with this Policy.

6.2. Holding KVK Committee

A "Holding KVK Committee" has been established within the company to ensure compliance with personal data protection regulations, its preservation, and maintenance, and to provide the necessary coordination within Anadolu Grubu Holding. The Holding KVK Committee is responsible for ensuring unity among the departments of Anadolu Grubu Holding, executing and improving the systems established to ensure that the activities carried out are in compliance with personal data protection regulations.

In this context, the main responsibilities of the Holding KVK Committee are outlined below:



- To prepare and implement the fundamental policies related to the protection and processing of personal data within the company,
- To decide how the implementation and supervision of the policies regarding the protection and processing of personal data within the company will be carried out, and in this regard, to assign responsibilities and ensure coordination,
- To identify the necessary actions to ensure compliance with the KVKK and relevant regulations; to monitor their implementation and ensure coordination,
- To raise awareness regarding the protection and processing of personal data both within the company and among cooperating institutions,
- To identify potential risks in the company's personal data processing activities and ensure necessary precautions are taken; to provide suggestions for improvements,
- To design and implement training programs related to personal data protection and the application of policies,
- To resolve personal data subjects' applications,
- To coordinate the implementation of information and training activities to ensure that data subjects are informed about the company's personal data processing activities and their legal rights,
- To prepare and implement changes to the fundamental policies regarding the protection and processing of personal data,
- To monitor developments and regulations concerning the protection of personal data; to provide recommendations to senior management regarding necessary actions in the company's operations in line with these developments and regulations,
- To manage relations with the institution and the Board,
- To carry out other tasks related to personal data protection assigned by the Holding KVK Upper Committee,
- To provide regular reports to the Holding KVK Upper Committee on compliance with the KVKK.



7. Ensuring the Security and Confidentiality of Personal Data

Anadolu Grubu Holding takes all necessary measures, within its capabilities, to prevent the unlawful disclosure, transfer, or access to personal data, or any other security deficiencies that may occur, in accordance with the nature of the data to be protected.

In this regard, Anadolu Grubu Holding takes all necessary (i) administrative and (ii) technical measures, (iii) establishes an audit system within the company, and (iv) acts in accordance with the measures stipulated in the KVKK in the event of unlawful disclosure of personal data.

(1) Administrative Measures Taken by Anadolu Grubu Holding to Ensure the Lawful Processing of Personal Data and Prevent Unlawful Access to Personal Data

- Anadolu Grubu Holding provides training to its employees on personal data protection law and ensures their awareness.
- In cases where personal data is transferred, Anadolu Grubu Holding ensures that contracts with the parties receiving the data include provisions that require them to fulfill their obligations to ensure data security.
- The personal data processing activities carried out by Anadolu Grubu Holding are examined in detail and periodically reviewed, with updates made as necessary. In this context, the necessary steps to ensure compliance with the personal data processing conditions outlined in the KVKK are identified.
- Anadolu Grubu Holding identifies the actions that need to be taken to ensure compliance with the KVKK, regulates these actions through internal policies, and periodically reviews and updates them as necessary.



(2) Technical Measures Taken by Anadolu Grubu Holding to Ensure the Lawful Processing of Personal Data and Prevent Unauthorized Access to Personal Data.

- Anadolu Grubu Holding takes reasonable technical measures to protect personal data to the extent that technology allows, and these measures are updated and improved in parallel with developments.
- In technical matters, specialist personnel are employed or expert consultants are engaged when necessary.
- Regular audits are conducted to ensure the implementation of the measures taken.
- Software and systems are established to ensure security.
- Access to personal data processed within Anadolu Grubu Holding is restricted to relevant employees in line with the specified processing purposes..

(3) The Auditing Activities Carried Out by Anadolu Grubu Holding Regarding the Protection of Personal Data

Anadolu Grubu Holding monitors the implementation of the technical and administrative measures taken to ensure the protection and security of personal data, and executes practices to maintain their effectiveness. The results of these auditing activities are reported to the Holding KVK Committee and the relevant department within Anadolu Grubu Holding. Based on the audit results, activities are carried out to improve and enhance the measures taken to protect the data.

(4) Measures to be Taken in Case of Unauthorized Disclosure of Personal Data

In cases where it is determined that personal data has been unlawfully obtained by unauthorized individuals within the scope of the personal data processing activities carried out by Anadolu Grubu Holding, the situation will be promptly reported to the Board and the relevant data subjects without delay.



8. Purposes of Personal Data Processing and Categories of Personal Data Subject to Processing Activities

8.1. Categories of Personal Data

Personal data of the groups listed below are processed either partially or fully in an automated manner or, as part of a data recording system, in a non-automated manner by Anadolu Grubu Holding.

CATEGORIES OF PERSONAL DATA	EXPLANATION
Identity Information	These are personal data that contain information about a person's identity, such as first and last name, Turkish Republic ID number, nationality, mother's name, father's name, place and date of birth, gender, and documents like driver's license, national ID card, and passport. It also includes information such as tax number, social security number (SGK), signature, vehicle license plate, etc.
Contact Information	Contact information; personal data such as phone number, address, email address, fax number.
Physical Space Security Information	Personal data related to records and documents taken during entry to a physical space and while staying within the space; such as camera footage, fingerprint records, and records taken at security checkpoints, etc.
Transaction Security Information	Personal data processed to ensure the technical, administrative, legal, and commercial security of both the Data Subject and the Company while carrying out Anadolu Grubu Holding's business activities.
Risk Management Information	Personal data processed through methods used in accordance with generally accepted legal, commercial practices, and principles of integrity to manage commercial, technical, and administrative risks.



Financial Information	Personal data processed regarding any information, documents, and records showing the financial results created within the legal relationship between Anadolu Grubu Holding and the Data Subject, such as bank account numbers, IBAN numbers, credit card information, financial profile, asset data, and income information.
Legal Transaction and Compliance Information	Personal data processed in relation to the identification, tracking, and execution of legal claims and rights of Anadolu Grubu Holding, as well as its legal obligations and compliance with Anadolu Grubu Holding policies.
Audit and Inspection Information	Personal data processed in relation to Anadolu Grubu Holding's legal obligations and compliance with company policies.
Special Categories of Personal Data	Data specified in Article 6 of the KVKK (for example, health data including blood type, biometric data, religious beliefs, and membership in associations).
Request/Complaint Management Information	Personal data related to the receipt and evaluation of any request or complaint directed to Anadolu Grubu Holding.
Reputation Management Information	Personal data collected with the purpose of protecting Anadolu Grubu Holding's commercial reputation and associated with an individual (e.g., posts or mentions related to Anadolu Grubu Holding).



8.2. Purposes of Personal Data Processing

Personal data is processed by Anadolu Grubu Holding for the purposes listed below, in accordance with the conditions and principles of data processing. The existence of these purposes may vary for each Data Subject.

The obtained personal data is processed by Anadolu Grubu Holding within the scope of the personal data processing conditions specified in Articles 5 and 6 of the KVKK and for the purposes listed below:

- Planning and/or execution of internal training activities,
- Planning and execution of emergency management processes,
- Planning and execution of corporate sustainability activities,
- Planning of human resources processes,
- Tracking of legal affairs,
- Planning and execution of business activities,
- Establishment and management of information technology infrastructure,
- Planning of information security processes,
- Planning and execution of corporate relations and communication activities,
- Planning and execution of internal orientation activities,
- Planning and/or execution of activities related to business effectiveness/productivity and/or appropriateness analysis,
- Ensuring the data is accurate and up to date,
- Recruitment/employment,
- Ensuring the security of company campuses and/or facilities,
- Creating and tracking visitor records,
- Tracking contract processes and/or legal claims,
- Planning and/or execution of business continuity activities,
- Planning and execution of company audit activities,
- Planning and execution of necessary operational activities to ensure company operations are conducted in accordance with company procedures and/or relevant regulations,
- Carrying out corporate and partnership law operations,



- Ensuring the security of company operations,
- Managing and/or auditing relationships with subsidiaries,
- Executing personnel recruitment processes,
- Planning and executing corporate governance activities,
- Executing strategic planning activities,
- Planning and executing external training activities.

8.3. Categories of Shared Parties

Anadolu Grubu Holding, in accordance with the principles outlined in the KVKK, particularly Articles 8 and 9 of the KVKK, may transfer the personal data of data subjects within the scope of the Policy (See Section 2.2.) to the groups of persons listed below for the purposes specified:

- Anadolu Group Companies,
- Anadolu Grubu Holding suppliers,
- Anadolu Grubu Holding affiliates,
- Anadolu Grubu Holding business partners,
- Third parties processing personal data on behalf of Anadolu Grubu Holding,
- Authorized public institutions and organizations and authorized private legal entities,
- Other third parties, in accordance with the conditions for data transfer.

The scope of the individuals mentioned above for data transfer and the possible purposes of data transfer are outlined below.



PERSONS TO WHOM DATA MAY BE TRANSFERRED	DEFINITION	PURPOSE OF DATA TRANSFER
Business Partner	Parties with whom Anadolu Grubu Holding has established partnerships for purposes such as conducting business activities	Limited to ensuring the fulfillment of the purposes for which the partnership was established
Supplier	Parties providing services to Anadolu Grubu Holding in accordance with Anadolu Grubu Holding's instructions and orders, and based on a contractual agreement, within the scope of conducting its business activities.	Limited to ensuring the provision of services required for the Company to carry out its commercial activities, which the Company obtains externally from a supplier.
Affiliate	Companies in which the Company holds shares.	Limited to ensuring the execution of the Company's commercial activities that require the participation of its subsidiaries.
Anadolu Group Companies	All companies that make up Anadolu Group.	Limited to the purposes of planning the company's commercial strategies, carrying out activities, and conducting audits.



Legally Authorized Public Institutions and Organizations	Public institutions and organizations authorized to obtain information and documents from the Company in accordance with the relevant legal provisions.	Limited to the purpose requested by the relevant public institutions and organizations within their legal authority.
Legally Authorized Private Law Entities	Private legal entities authorized to obtain information and documents from the Company in accordance with the relevant legal provisions.	Limited to the purpose requested within the legal authority of the relevant private legal entities.

9. Closed-Circuit Television (CCTV) Usage

In the building where the headquarters of Anadolu Grubu Holding is located, visual and auditory data may be collected through a closed-circuit camera system for purposes such as preventing criminal activities, ensuring the security of the building, its surroundings, equipment, visitors, and employees. These data will only be stored for the duration necessary for these purposes. Anadolu Grubu Holding will take all necessary technical and administrative measures to ensure the security of the personal data collected through the closed-circuit camera system.



10. Website Usage

On the websites owned and managed by Anadolu Grubu Holding, visitors' internet activities within the site are recorded through technical means (e.g., cookies) in order to ensure that visitors use the sites in accordance with their intended purpose, to offer personalized content, to provide social media features, to facilitate their return visits by remembering them, and to engage in online advertising activities.

Anadolu Grubu Holding may discontinue the use of cookies on its websites, change the types or functions of these cookies, or add new cookies.

Anadolu Grubu Holding will process the personal data obtained through these cookies in accordance with the Personal Data Protection Law (KVKK) and the provisions and conditions of this Policy.

Detailed explanations regarding the protection and processing of personal data for these websites can be found in the "Privacy Policy" texts of the respective websites.

11. Review

This Policy will be reviewed at least once a year by the Holding Data Protection Committee and updated if necessary. The Holding Data Protection Senior Committee is responsible and authorized for the enactment, modification, implementation, and repeal of this Policy.



12. Definitions

The definitions of the terms used in the Policy are provided below:

Explicit Consent	: Consent that is informed, specific to a particular issue, and freely given.
Anonymization	: The process of making personal data irreversibly unidentifiable and unlinkable to any identified or identifiable person, even when combined with other data.
Regulation on the Processing of Personal Health Data	: The Regulation on the Processing of Personal Health Data and Ensuring Privacy, published in the Official Gazette No. 29863 on October 20, 2016.
Personal Health Data	: Any health-related information about an identified or identifiable natural person.
Personal Data	: Any information relating to an identified or identifiable natural person.
Data Subject	: The natural person whose personal data is processed. For example, customers and employees.
Processing of Personal Data	: Any operation performed on personal data, either automatically or non-automatically as part of a data recording system, including collection, recording, storage, preservation, alteration, rearrangement, disclosure, transfer, acquisition, making accessible, classification, or restriction of use.

**KVKK**

: The Personal Data Protection Law No. 6698, dated March 24, 2016, published in the Official Gazette No. 29677 on April 7, 2016.

Kurul : Personal Data Protection Board

Authority : Personal Data Protection Authority

Special Category Personal Data

: Data related to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, membership in associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data.

Policy

: AG Anadolu Grubu Holding A.Ş. Personal Data Protection and Processing Policy

Anadolu Grubu Holding / Company

: AG Anadolu Grubu Holding A.Ş.

Anadolu Grubu Holding Business Partners

: The parties with whom Anadolu Grubu Holding establishes partnerships for various purposes while carrying out its commercial activities.

Anadolu Grubu Holding Suppliers

: Parties that provide services to Anadolu Group Holding based on contracts.

Anadolu Grubu Companies/ Group Companies

: Companies included in Anadolu Group.

The Constitution of The Republic Of Türkiye

: The Constitution of the Republic of Türkiye, dated November 7, 1982, and published in the Official Gazette No. 17863 on November 9, 1982.



- Turkish Penal Code** : The Turkish Penal Code No. 5237, dated September 26, 2004, published in the Official Gazette No. 25611 on October 12, 2004.
- Data Processor** : A natural or legal person who processes personal data on behalf of the data controller, based on the authority granted by the data controller.
- Data Controller** : The person who determines the purposes and means of processing personal data and manages the place where the data is systematically stored.