

**ECZACIBAŐI MOMENTUM TEKNOLOJİ
YATIRIMLARI ANONİM ŐİRKETİ
POLICY ON THE PROTECTION AND
PROCESSING OF PERSONAL DATA**

Version 0.3

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1. INTRODUCTION

1.1. Purpose and Scope

Law No. 6698 on Protection of Personal Data (the "**Law**") has entered into force as of 7 April 2016, and this Policy on the Processing and Protection of Personal Data of Eczacıbaşı Momentum Teknoloji Yatırımları Anonim Şirketi ("**PDP Policy**") has been drafted and implemented in order to ensure compliance of Eczacıbaşı Momentum Teknoloji Yatırımları Anonim Şirketi ("**Eczacıbaşı Momentum**" or the "**Company**") with the Law and to determine the principles to be followed by the Company in fulfilling its obligations regarding the protection and processing of personal data.

This PDP Policy determines the conditions for processing personal data and sets out the main principles adopted by the Company in the processing of personal data. Accordingly, the PDP Policy covers all personal data processing activities carried out by the Company for persons other than the Company's employees within the scope of the Law and all personal data subjects whose personal data are processed by the Company.

1.2. Effective Date and Amendment

This PDP Policy has become effective on 29/09/2023 upon approval by the Company. The Company reserves the right to make amendments to the PDP Policy in parallel with the legislation.

In case of any conflict between the legislation in force, particularly the Law, and the provisions of this PDP Policy, the provisions of the legislation in force shall apply.

2. DATA SUBJECTS, DATA PROCESSING PURPOSES AND DATA CATEGORIES FOR THE PERSONAL DATA PROCESSING ACTIVITIES CARRIED OUT BY OUR COMPANY

2.1. Data Subjects

Data subjects within the scope of the PDP Policy are all natural persons other than the Company's employees whose personal data are processed by the Company. Accordingly, the main categories of data subjects are as follows:

DATA SUBJECT CATEGORIES		DESCRIPTION
1	Authorized Representative of the Company	Refers to the Company's board members and other authorized natural persons.
2	Cooperating Institution/Company Employees, Shareholders or Officials	Refers to natural persons who work in institutions with which the Company has any kind of business relationship (e.g. supplier, business/solution partner, sub-employer, distributor, etc.) or who are shareholders or officials of these institutions.
3	Third Parties	Refers to other natural persons who are subject to the personal data processing activities of the Company other than the above-mentioned categories of data subjects and the Company's employees.

2.2. Personal Data Processing Purposes

The Company processes your personal data and sensitive personal data for the following purposes in accordance with the personal data processing conditions set forth in the Law and the relevant legislation:

	PURPOSES
	1. Management of relations with business partners and suppliers
	1. Follow-up of finance and accounting affairs
	<ol style="list-style-type: none"> 1. Follow-up of legal affairs 2. Conducting auditing activities 3. Conducting operational activities necessary for executing activities in accordance with the procedures and the relevant legislation 4. Provision of information to authorized institutions as a requirement of the legislation

2.3. Personal Data Categories

The main categories of personal data processed by the Company are as follows:

CATEGORIZATION OF PERSONAL DATA	DESCRIPTION
Identity Information	All information regarding the identity of the person contained on documents such as driver's license, identity card, passport, attorney's ID card, marriage certificate
Contact Information	Details allowing to get in touch with the data subject such as phone number, address, e-mail address
Physical Location Security Information	Personal data relating to records and documents taken during entry to and stay in a physical location, such as camera footage, vehicle information records and records taken at the security checkpoint
Financial Information	Personal data processed regarding information, documents and records showing all kinds of financial outcomes that arose depending on the type of legal relationship established by and between our Company and the personal data subject, and information such as bank account number, IBAN number, payable/receivable information
Legal Transaction and Compliance Information	Personal data processed in order to determine and follow up our legal receivables and rights and to fulfill our obligations and to comply with our legal obligations and the Company's policies
Transaction Information	Data such as call center logs, membership information, cookie logs related to the services provided within the framework of the activities carried out by the Company or processed to protect the legal and other interests of the Company or the personal data subject

3. PRINCIPLES AND CONDITIONS REGARDING PERSONAL DATA PROSESSION

3.1. Principles regarding Personal Data Procession

The Company processes personal data in accordance with the personal data procession principles stipulated under article 4 of the Law. It is obligatory to comply with these principles for each and every personal data procession activity:

- **Processing personal data in compliance with the law and principles of good faith;** while processing personal data, the Company acts in accordance with the relevant laws, secondary legislation and general principles of law ; prioritizes processing personal data limited to the purpose of processing and taking the reasonable expectations of data subjects into account.
- **Keeping personal data accurate and up-to-date;** The Company pays attention to whether the personal data processed by the Company is up-to-date and conducts controls in this regard. Data subjects are allowed to demand correction or deletion of their inaccurate or outdated data in this respect.
- **Processing personal data for definite, clear and legitimate purposes;** The Company determines the purposes of processing data in accordance with the law before each personal data processing activity.
- **Ensuring that personal data is relevant, limited and proportionate to the purpose for which it is processed;** The Company limits the data processing activity to the personal data required to fulfill the purpose of collection and takes necessary steps to ensure that personal data not related to this purpose is not processed.
- **Retaining personal data for the period that is either stipulated in the legislation or required by the processing purpose;** Taking into account the sector practices regarding the retention of personal data, where a longer retention period is not determined by the Company in accordance with the law, , the personal data processed by the Company is deleted, destroyed or anonymized after the purpose of personal data processing is eliminated or upon the expiration of the period stipulated in the legislation.

3.2. Conditions regarding Personal Data Procession

The Company processes your personal data provided that at least one of the personal data processing conditions stipulated under article 5 of the Law exists. The conditions in question are described below:

- **Explicit consent of the personal data subject;** in the absence of other data processing conditions, the personal data of the data subject may be processed by the Company in accordance with the general principles set out under the section 3.1. provided that the data subject gives consent with his/her free will limited to that transaction only, having sufficient information regarding the personal data processing activity, in a manner that leaves no room for hesitation..
- If **personal data processing activity is clearly stipulated in the laws**, personal data may be processed by the Company without the explicit consent of the data subject. In such case, the Company shall process personal data within the framework of the relevant legislation.
- If **the explicit consent of the data subject cannot be obtained due to actual impossibility and personal data processing is obligatory**, personal data of the data subject who is unable to provide his/her consent or whose consent cannot be validated by the Company will be processed in the event that personal data processing is obligatory to protect the life or physical integrity of the

data subject or a third person.

- If ***the personal data processing activity is directly related to the constitution or execution of a contract***, personal data processing activity will be carried out if it is necessary to process personal data of the parties to a written or verbal contract established between the data subject and the Company.
- If ***it is mandatory for the data controller to carry out personal data processing activities in order to fulfill its legal obligations***, the Company will process personal data in order to fulfill its legal obligations stipulated under the applicable legislation.
- If ***the data subject has publicized their personal data***, the personal data that has been disclosed to the public in any way by the data subject and made available to everyone as a result of the publication may be processed by the Company without the explicit consent of the data subjects, limited to the purpose of publication.
- If ***personal data processing is mandatory for the establishment, exercise or protection of a right***, the Company may process the personal data of the data subject without the explicit consent of the data subjects within the scope of the obligation.
- If ***data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject***, personal data may be processed by the Company, provided that the balance of interests of the Company and the of the data subject is taken into consideration. Accordingly, the Company first determines the legitimate interest to be achieved as a consequence of the processing activity based on legitimate interest. It evaluates the possible impact of the processing of personal data on the rights and freedoms of the data subject and performs the processing activity if it is of the opinion that the balance is not disturbed.

3.3. Conditions regarding Sensitive Personal Data Processing

Sensitive personal data are stipulated in an exhaustive manner under article 6 of the Law. These are namely the data related to race, ethnic origin, political opinion, philosophical belief, religion, sect, or any other faith, dress, association/foundation/trade-union membership, health, sexual life, penal conviction, and security measures, as well as the biometric and genetic data.

The Company processes sensitive personal data in accordance with the relevant legislation in following cases; by ensuring that additional measures determined by the Personal Data Protection Board ("**PDP Board**") are implemented:

- ***Processing of sensitive personal data other than health and sexual life***; if it is explicitly stipulated in the laws, in other words, if there is a clear provision in the relevant law regarding the processing of personal data, it can be processed without seeking the explicit consent of the data subject. Otherwise, the explicit consent of the data subject shall be obtained for the processing of such sensitive personal data.
- ***Personal data relating to health and sexual life*** may be processed without seeking explicit consent by persons or authorized institutions and organizations under the obligation of confidentiality for the purposes of protecting public health, executing preventive medicine, medical diagnosis, treatment and care services, planning and management of healthcare services and their financing. Otherwise, the explicit consent of the data subject shall be obtained for the processing of such sensitive personal data.

4. TRANSFER OF PERSONAL DATA

The Company may transfer personal data to third parties at home or abroad in accordance with the additional regulations listed in articles 8 and 9 of the Law and determined by the PDP Board; in case the conditions for the transfer of personal data exist.

- ***Transfer of personal data to third parties at home;*** the Company may transfer personal data to third parties at home in the presence of at least one of the data processing conditions specified in articles 5 and 6 of the Law and explained under section 3 of this PDP Policy and provided that the Company complies with the basic principles regarding the data processing conditions.

- ***Transfer of personal data to third parties abroad;***

If the country to which the transfer will be made is among the safe countries with adequate protection declared by the PDP Board; the Company may transfer personal data to third parties abroad in the presence of at least one of the data processing conditions specified in articles 5 and 6 of the Law and explained under section 3 of this PDP Policy and provided that the Company complies with the basic principles regarding the data processing conditions.

If the country to which the transfer will be made **is not** among the safe countries with adequate protection, personal data may be transferred to third parties abroad in the presence of at least one of the data processing conditions explained under section 3 of this PDP Policy and in accordance with the basic principles specified in article 4 of the Law in the following cases:

- There is explicit consent by the data subject
- There is written undertaking of adequate protection by the Company and the data recipient in the relevant country and permission of the PDP Board for the relevant transfer

5. DISCLOSURE TO DATA SUBJECTS AND RIGHTS OF DATA SUBJECTS

Data subjects are required to be informed about the processing of their personal data before, or at the latest at the time of, the processing of personal data pursuant to article 10 of the Law. The necessary internal structure has been established pursuant to the relevant article to ensure that data subjects are informed in all cases where personal data processing activities are carried out by the Company in its capacity as the data controller. Accordingly;

- Please review the disclosure texts provided to you specific to the relevant process and section 2.2 of the PDP Policy for the purpose of processing personal data.
- Please review the disclosure texts provided to you specific to the relevant process and section 4 of the PDP Policy for the parties to whom personal data are transferred and the purpose of transfer.
- Please refer to the disclosure texts provided to you specific to the relevant process and sections 3.2 and 3.3 of the PDP Policy to review the conditions regarding the processing of your personal data, which can be collected through different channels physically or electronically.
- The rights of data subjects pursuant to article 11 of the Law are listed below:
 - To learn whether their personal data are processed or not;
 - To request information if their personal data are processed,
 - To find out the purpose for processing of their personal data and whether they have been used in accordance with this purpose,
 - To know the third parties to whom their personal data have been transferred at home or abroad,
 - To request correction of personal data, if they have been processed incompletely or incorrectly, and to ask for having the aforementioned third parties, to whom their

personal data have been transferred, be notified of the process carried out in this respect,

- To request for the deletion or destruction of personal data if the reasons for processing the same have ceased to exist although they have been processed in accordance with the Law and other relevant laws, and ask that the process carried out in this context be notified to the third parties to whom personal data have been transmitted,
- To object to occurrence of any result that is to their detriment by means of analysis of personal data exclusively through automated systems,
- To request compensation in case they incur damages due to unlawful processing of their personal data.

Applications regarding the data subject rights listed above can be submitted to the Company by filling out the Data Subject Application Form. Depending on the nature of the request, the application will be concluded free of charge as soon as possible and within thirty days at the latest. However, if the transaction requires an additional cost, the data subject may be charged a fee according to the tariff to be determined by the PDP Board.

The Company primarily ascertains whether the claimant is the real beneficiary while assessing the applications. On the other hand, the Company may ask for detailed and additional information in cases of necessity so as to reach a better understanding of the claim in question.

The Company responds to the applications of data subjects either in writing or electronically. In case an application is to be rejected, cause of such rejection shall be declared with its rationale to the relevant data subject.

If personal data are not obtained directly from the data subject, the Company carries out activities to inform the data subjects (1) within a reasonable period of time from the acquisition of personal data, (2) if personal data will be used for communication with the data subject, during the first communication, (3) if personal data will be transferred, at the latest during the first transfer of personal data.

6. DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

In cases where, taking into account the sectoral practices regarding the retention of personal data, a longer retention period is not determined by the Company in accordance with the law, , in the event that the reasons requiring its processing disappear, although it has been processed in accordance with article 7 of the Law, personal data shall be deleted, destroyed or anonymized by the Company ex officio or upon the request of the data subject, in accordance with the guidelines published by the Personal Data Protection Authority, periodic destruction periods and application of the data subject.

The personal data processed by the Company is handled on the basis of categories, and maximum data retention periods have been determined for each category of personal data in line with the data processing process to which it relates. Detailed information on how the retention and destruction process will be carried out, including the maximum periods mentioned, is set out in the Personal Data Retention and Destruction Policy issued by the Company.