# İÇTUR SERVİS LİMİTED ŞİRKETİ

# PERSONAL DATA PROCESSING AND PROTECTION POLICY

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# INTRODUCTION

Law No. 6698 on the Protection of Personal Data ***("Law")*** entered into force on April 7, 2016 and contains regulations on the processing of all kinds of information regarding *"identified or identifiable"* natural persons ***("Data Subject")***. As İçtur Servis Limited Şirketi ***("Company")***, we attach utmost importance to the processing and protection of personal data in accordance with the law and we act with this care in all our planning and activities. Therefore, our Company takes all administrative and technical measures for the protection and processing of personal data. The most important pillar of this issue is the protection of the personal data of our Employee Candidates, Company Shareholders, Company Officials, Visitors, Employees, Shareholders, Officials and Third Parties of the Institutions we are in cooperation with, which is managed by this Policy on Processing and Protection of Personal Data ***("Policy")***.

In accordance with Article 20 of the Constitution, everyone has the right to request the protection of personal data concerning oneself. Regarding the protection of personal data, which is a constitutional right, our Company pays due attention to the protection of the personal data of Employee Candidates, Company Shareholders, Company Officials, Visitors, Employees, Shareholders, Officials and Third Parties of the Institutions with which it cooperates and makes this a company policy.

In this Policy, detailed explanations will be provided regarding the basic principles listed below, which we have adopted as the Company in the processing of personal data:

* Processing personal data in accordance with the law and good will,
* Keeping personal data accurate and when necessary updating it,
* Processing personal data for specific, clear and legitimate purposes,
* Connected, limited and measured processing of personal data for the purpose for which they are processed,
* Retaining Personal Data for the Period Required for the Purpose stipulated in the Legislation or for the Purpose for Which They were Processed,
* Informing personal data owners,
* Establishing the necessary system for personal data owners to exercise their rights,
* Taking necessary measures for the protection of personal data,
* Acting in accordance with the relevant legislation and the regulations of the Personal Data Protection Board ***("Board")*** in transferring personal data to third parties in line with the requirements of the purpose of processing,
* Showing the necessary sensitivity to the processing and protection of sensitive personal data.

# Objective of the Policy

The purpose of this Policy is to inform the owners of personal data - employee candidates, company shareholders, company officials, visitors, employees, shareholders, authorities and third parties of institutions with which we cooperate - about the obligations of our company arising from the Law and other relevant legislation, as well as the procedures and principles to be followed in accordance with the Law, and the maximum protection of fundamental human rights and freedoms, especially privacy, regulated by Article 20 of the Constitution, in the processing and protection of personal data in accordance with the purpose of the Law.

In line with the purpose of the Policy, we aim to ensure full compliance with the legislation in the processing and protection of personal data carried out by our Company and to protect the right to privacy and data security of personal data owners.

# Scope of the Policy

This Policy relates to all personal data of our Employee Candidates, Company Shareholders, Company Officials, Visitors, Employees, Shareholders, Officials and Third Parties of the Institutions we are in cooperation with, which are processed automatically or non-automatically provided that they are part of any data recording system. In this respect, all of the provisions of the Policy may be applied to the personal data owners listed above, or only some of the provisions may be applied.

# Implementation of the Policy and Related Legislation

This Policy has been created by concretizing and organizing the rules set forth by the legislation in force within the scope of our Company's practices. In this context, the relevant legal regulations in force regarding the processing and protection of personal data will primarily apply. In case of any incompatibility between the legislation in force and the Policy, our Company accepts that the legislation in force will be applied. As the Company, we carry out the necessary systems and preparations to comply with the effective periods stipulated in the Law.

# Enforcement of the Policy

It was issued by our company and entered into force on 08.04.2016. The Policy is published on our Company's website [www.icturservis.com](http:// www.icturservis.com ) .

# PROTECTION OF PERSONAL DATA

In order to ensure data security, the following measures and precautions are taken by our Company in accordance with Article 12 of the Law.

# Security

Our Company takes all necessary technical and administrative measures to ensure the appropriate level of security in order to prevent illegal access and processing of personal data in accordance with the Law and to ensure the protection of personal data.

# Auditing

Our Company carries out the necessary audits and has them carried out in order to establish the data security described above and to ensure the regularity and continuity of the measures taken. In this context, a team has been formed within the Company with one participant each from the HR, IT and Legal departments, and external support is also received.

# Confidentiality

Our Company takes all necessary technical and administrative measures according to the technological possibilities and implementation costs in order to ensure that the relevant data controllers and data processors do not disclose their personal data to others in violation of the provisions of the Law and the Policy and do not use them for purposes other than processing. In this context, our Company employees are informed and trained on the Law and the Policy.

# Unauthorized Access to Personal Data

In the event that the personal data processed by our Company are obtained by others in non-compliant ways with the Law, our Company shall carry out the necessary procedures to notify the Data Subject and the Board as soon as possible. If deemed necessary by the Board, this situation may be announced on the Board's website or by any other method deemed appropriate by the Board.

# Respecting the Legal Rights of Data Subjects

Our Company respects all legal rights of the data subjects regarding the implementation of the Policy and the Law and takes all necessary measures to protect these rights.

# Protection of Sensitive Personal Data

According to Article 6 of the Law, data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data are sensitive personal data. Sensitive personal data is data that, if processed, carries the risk of causing discrimination or victimization against its owners and should be protected much more strictly than other personal data. For this reason,

although it is the main principle not to receive such data by our Company, all necessary measures are taken sensitively to protect such personal data processed in accordance with the law.

# PROCESSING AND TRANSFER OF PERSONAL DATA

# General Principles for Processing Personal Data

Personal data are processed by our Company in accordance with the procedures and principles stipulated in the Law and this Policy. While processing personal data, our Company acts in accordance with the following principles regulated by Article 4 of the Law.

# Compliance with the Law and Good Faith

Our Company processes personal data in accordance with the relevant legislation and the requirements of the rule of honesty and uses it within these limits. In this context, our Company takes into account the interests and reasonable expectations of the data subject when processing personal data and takes care to ensure that the data processing activity in question is transparent for the data subject.

# Being Accurate and Up-to-Date When Necessary

Our company ensures that the personal data it processes is accurate and up-to-date, taking into account the fundamental rights and legitimate interests of personal data owners. In this context, it carefully considers issues such as identifying the sources from which the data are obtained, confirming their accuracy, and assessing whether they need to be updated. Our Company keeps the channels open to ensure that the information of the data subject is accurate and up-to-date.

# Processing for Specific, Explicit and Legitimate Purposes

Our Company processes personal data for legitimate purposes and shares the clearly and precisely determined purpose of data processing with the data subjects. The legitimate purpose means that the personal data processed by our Company is related to and necessary for the work it has done or the services it provides. In the disclosures made to the data subjects and in the explicit consents obtained, the purposes for which the data obtained from the data subjects are processed are clearly and explicitly stated.

# Being relevant, limited and proportionate to the purpose for which they are processed

Our Company ensures that the personal data processed are suitable for the realization of the specified purposes and that personal data that are not related to the realization of the purpose in question or that are not needed are not processed. In this context, our Company does not process data to meet the needs that may arise later.

# Retention for the Period Stipulated in the Relevant Legislation or Required for the Purpose for which they are Processed

If there is a period stipulated in the relevant legislation for the storage of data, our Company complies with these periods; otherwise, it retains personal data only for the period required for the purpose for which they are processed. The retention period of personal data varies depending on the nature of the business or service

carried out by our Company or the data obtained. In the event that all of the conditions for the processing of a personal data by our Company disappear, it is destroyed in the first 6-month periodic disposal period following the date on which the obligation to destroy the data in question arises.

# Terms of Processing of Personal Data

As a rule, our Company does not process personal data without the explicit consent of the data subject. However, in the presence of one of the following conditions stipulated in Article 5/2 of the Law, personal data may be processed without seeking the explicit consent of the data subject.

# Explicitly Stipulated in Laws

Our Company may process the personal data of data subjects, even without their explicit consent, in cases expressly stipulated by law. For example, the processing of personal data of our employees in accordance with the Labor Law legislation will be evaluated within this scope.

# Necessity for the Protection of the Life or Bodily Integrity of the Person or of Another Person Who Is Incapable of Expressing His/her Consent Due to Physical Impossibility or Whose Consent Is Not Recognized as Legally Valid

Personal data may be processed by our Company without explicit consent in order to protect the life or physical integrity of persons in cases where the person concerned is unable to disclose his/her consent due to actual impossibility or where the consent disclosed is not valid. For example, in a situation where the person is unconscious or mentally ill and his/her consent is not valid, the personal data of the person concerned may be processed during a medical intervention in order to protect his/her life or physical integrity. In this context, the processing of personal data of a person whose liberty is restricted through a telephone, computer or other technical device carried by the person himself/herself in order to locate him/her is not subject to the explicit consent of the person concerned.

# Necessity of Processing Personal Data of the Parties to the Contract, Provided that it is Directly Related to the Establishment or Performance of a Contract

Personal data may be processed by our Company in relation to the establishment or performance of a contract. For example, an account number of the creditor may be obtained for the payment of money under a contract.

* + - 1. **Necessity for our Company to Fulfill its Legal Obligation** If the processing of personal data is mandatory for our Company to fulfill its legal obligations, the necessary personal data may be processed by our Company without the explicit consent of the data subjects. For example, during a tax audit by our Company, information belonging to our Employees or Customers may be submitted to the examination of the relevant public officials.

# Being Publicized by the Data Subject Himself/Herself

Personal data made public by the person concerned by our Company, in other words, personal data that have been disclosed to the public in any way and thus become known to everyone, may be processed by our Company on the assumption that the legal interest to be protected has disappeared in the processing of such data.

# Necessity of Data Processing for the Establishment, Exercise or Protection of a Right

In cases where data processing is mandatory for the exercise or protection of a legitimate right under the law, our Company may process the personal data of the data subjects without seeking explicit consent.

# Necessity of Data Processing for Legitimate Interests of Our Company, Provided that it does not harm the Fundamental Rights and Freedoms of the Data Subject

Our Company may process the personal data of the data subjects in cases where the processing of personal data is mandatory for the provision of legitimate interests, provided that it does not harm the fundamental rights and freedoms of the data subjects protected under the Law and Policy. Our Company shows the necessary sensitivity to comply with the basic principles regarding the protection of personal data and to observe the balance of interests of our Company and the data subjects.

# Conditions for Processing Sensitive Personal Data

Our Company does not process sensitive personal data unless necessity arises and without the explicit consent of the data subject. However, personal data other than health and sexual life may be processed without the explicit consent of the data subject in cases stipulated by law. Personal data related to health are processed by our Company only for the purpose of protecting public health, conducting and managing medical diagnosis and treatment and care services, without seeking the explicit consent of the person concerned under the conditions that we are under the obligation of confidentiality. Our Company carries out the necessary procedures to take adequate measures determined by the Board in the processing of special categories of personal data.

# Conditions of Transfer of Personal Data

Our Company may transfer personal data and sensitive personal data to third parties in accordance with the Law by establishing the necessary confidentiality conditions and taking security measures in line with the purposes of processing personal data. Our Company acts in accordance with the regulations stipulated in the Law during the transfer of personal data. In this context, our Company may transfer personal data to third parties in line with legitimate and lawful personal

data processing purposes, based on and limited to one or more of the following personal data processing conditions specified in Article 5 of the Law;

* If the person concerned has given explicit consent,
* If there is a clear regulation in the laws regarding the transfer of personal data,
* If it is mandatory for the protection of the life or physical integrity of the person concerned or another person and the person concerned is unable to disclose his/her consent due to actual impossibility or his/her consent is not legally valid,
* If it is necessary to transfer personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract,
* If personal data transfer is mandatory for our company to fulfill its legal obligation,
* If the personal data has been made public by the data subject,
* If personal data transfer is mandatory for the establishment, exercise or protection of a right,
* If personal data transfer is mandatory for the legitimate interests of our Company, provided that it does not harm the fundamental rights and freedoms of the data subject,

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Conditions for Transfer of Personal Data Abroad:

Our Company may transfer the personal data and sensitive personal data of the data subjects to third parties abroad by taking the necessary security measures in line with the purposes of personal data processing. Personal data may be transferred by our Company to foreign countries declared to have adequate protection by the Board in the light of Article 9 of the Law or, in the absence of adequate protection, to foreign countries where the data controllers in Türkiye and the relevant foreign country undertake adequate protection in writing and where the Board's permission is granted.

# METHOD AND LEGAL REASON FOR COLLECTING PERSONAL DATA, CLASSIFICATION, PURPOSES OF PROCESSING AND TRANSFERRING, TO WHOM PERSONAL DATA IS TRANSFERRED

* + 1. Method and Legal Grounds for Collecting Personal Data

Personal data are collected in all kinds of verbal, written, electronic media; by technical and other methods, by various means such as our Company's website, in order to fulfill the responsibilities arising from the laws within the framework of legislation, contract, request and request-based legal reasons in order to fulfill the purposes set out in the Policy, and are processed by our Company or data processors assigned by our Company.

Classification of Personal Data

* **Identity Information**: Name-surname, TR ID number, marital status, nationality, parents' name-surname, place and date of birth, sex and other identity information

and driver's license, identity card and passport, title deed and other documents containing this information, tax number, SSI number, signature information, vehicle license plate and other information.

* **Contact Information:** Phone number (home, work, etc.), address, e-mail address, fax number, IP address and other information.
* **Transaction Security Information:** Personal data processed regarding the technical, administrative, legal and commercial security of both the data subject and the Company while conducting the Company's activities. For example, internet username and password.
* **Financial Information**: Personal data processed regarding information, documents and records showing all kinds of financial results arising in accordance with the employee-employer relationship established by the company with the person concerned, and bank account number, branch code, bank card information, IBAN number, credit card information, financial profile, credit rating, asset data, income information and other information.
* **Audiovisual Information**: Photographs and camera recordings, sound recordings and any data and other information where these data are located.
* **Personal Data**: All kinds of personal data processed for obtaining information that will be the basis for the protection of the personal rights of natural persons who are in a working relationship with the data subject.
* **Location Information: Information**that determines the location of the location of the data subject while using the vehicles of the Company and the Company's group companies by the data subject within the framework of the activities and operations of the Company or the Company's group companies or the companies and institutions in cooperation; travel data and other information.
* **Family Members and Relatives Information**: Identity information and contact information, as defined above, about the data subject's family members, (e.g. spouse, mother, father, child), relatives and other persons who can be reached in case of emergency, within the framework of the activities and operations of the Company or the Company's group companies or companies and institutions in cooperation with the Company or in order to protect the legal and other interests of the Company and the data subject.
* **Physical Space Security Information**: Personal data related to records and documents taken at the entrance to the physical space, during the stay in the physical space; camera recordings and records taken at the security point and other data.
* **Legal Transaction Information:** Data processed within the scope of the determination and follow-up of the Company's legal receivables and rights and the performance of its debts and legal obligations.
* **Sensitive Personal Information**: Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership to associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data of the persons specified in Article 6 of the Law.
* **Request/Complaint Management Information:** Personal data regarding the receipt and evaluation of the request or complaint addressed to our Company.

# Purposes of Processing Personal Data

Our Company will use personal data in order to provide our services in accordance with the provisions of the relevant legislation and to improve the quality of these services, to fulfill the activities stipulated by public authorities and / or listed as exceptions, to fulfill the activities of the Company / Group Companies, to comply with information retention, reporting, information obligations, to plan and implement our human resources policies in the best way, to plan and execute our commercial partnerships and strategies correctly, to ensure the legal, commercial and physical security of our Company and our business partners, to ensure the corporate functioning of our Company. It also processes personal data within the scope of the personal data processing conditions specified in Articles 5 and 6 of the Law, limited to the purposes of being able to visit our Company, protecting the security and legitimate interests related to your visit, offering our Company's products and services, communicating about the product and service you have received / will receive in this regard, as well as being used in marketing activities, offering services related to our Company's fields of activity such as product / service offer, modeling, reporting, scoring, risk monitoring, existing or new product studies and potential customer identification, and to improve the quality of these services and to fulfill its other activities, complying with the information obligations and improving the services offered on our Company's website, communicating with those who submit requests and complaints to our Company, and correcting errors on our Company's website.

# Purposes of Transfer of Personal Data

They are transferred within the scope of the conditions specified in Articles 8 and 9 of the Law, limited to the purposes of planning and implementing our human resources policies in the best way, planning and executing our commercial partnerships and strategies correctly, ensuring the legal, commercial and physical security of our Company and our business partners, ensuring the corporate functioning of our Company, carrying out studies to make you benefit from the products and services offered by our Company in the best way; recommending the products and services offered by our Company to you by customizing them according to your demands, needs and requests, ensuring data security at the highest level, creating databases, improving the services offered on our Company's website, contacting those who submit requests and complaints to our Company, eliminating errors on our Company's website.

# Persons to whom Personal Data will be Transferred

Your personal data may be transferred by our Company to our business partners, suppliers, group companies, affiliates, companies and institutions we cooperate with, companies from which we outsource services in order to fulfill our contractual or legal obligations (security, health, occupational safety, law, etc.), authorized institutions and organizations. In this context, our Company ensures that the transfer of your personal data between the units to which our personal data is transferred is in compliance with the Law at the highest level.

# PERSONAL DATA DESTRUCTION POLICY AND RETENTION PERIODS

* + 1. Deletion, Disposal or Anonymization of Personal Data

Our Company, without prejudice to the provisions of other laws regarding the deletion, disposal or anonymization of personal data, deletes, disposes of or anonymizes personal data ex officio or upon the request of the person concerned in the event that the reasons requiring its processing disappear, although it has been processed in accordance with the provisions of the relevant law, as regulated in Article 138 of the Turkish Penal Code No. 5237, Article 7 of the Law and the provisions of the Regulation on Deletion, Destruction or Anonymization of Personal Data ***("Regulation")*** published in the Official Gazette dated 28.10.2017.

On the other hand, pursuant to Article 7 of the Regulation titled 'Principles', all transactions regarding the deletion, disposal and anonymization of personal data are recorded by our Company and such records are kept for at least 3 years, without prejudice to our other legal obligations.

**With the deletion of personal data**, this data is rendered inaccessible and non-reusable in any way for the relevant users. Accordingly, our Company, as the data controller, takes all necessary technical and administrative measures to ensure that deleted personal data is inaccessible and non-reusable for the relevant users.

**Disposal of data** refers to the disposal of materials suitable for storing data, such as documents, files, CDs, diskettes, hard disks, etc., in such a way that the information cannot be retrieved and used again.

**Anonymization of data** means that personal data cannot be associated with an identified or identifiable natural person, even if it is matched with other data.

# Methods of Deletion, Disposal and Anonymization of Personal Data

* + - 1. Methods of Deletion and Disposal of Personal Data

Although it has been processed in accordance with the provisions of the relevant law, our Company may delete or dispose of personal data based on its own decision or upon the request of the person concerned if the reasons requiring its processing are completely eliminated.

Our Company may use the following methods for deletion and disposal:

* **Physical Destruction:** Personal data can also be processed by our Company in non-automatic ways, provided that they are part of any data recording system. When destroying such data, the system of physically destroying the relevant personal data in such a way that it cannot be subsequently accessed, used or retrieved by anyone is applied.
* **Sending to a Specialist for Secure Deletion** : In some cases, our Company may engage a specialist to destroy personal data on its behalf. In this case, personal data can be securely destroyed by an expert.

# Methods for Anonymizing Personal Data

Anonymization of personal data means making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even if the personal data is matched with other data. In accordance with Article 28 of the Law; anonymized personal data may be processed for purposes such as research, planning and statistics. Such processing is outside the scope of the Law and the explicit consent of the data subject will not be sought, and anonymization methods specified1 by the Authority may be used.

# Retention and Periodic Disposal Periods of Personal Data

Our Company stores personal data in accordance with the periods stipulated in the laws and other legislation. If there is no time regulation in the laws and other legislation regarding how long personal data should be stored, personal data is processed for a period until the realization of the purpose of processing personal data within the scope of the activity carried out when our Company processes that personal data. These data are deleted, disposed of or anonymized on the first periodic disposal date and process following the date on which the disposal obligation arises.

Our Company has set **January 15-30** and **June 15-30** as periodic disposal dates in order to destroy personal data whose purpose of processing has expired. Personal data for which

1 <http://www.kvkk.gov.tr/yayinlar/Kisisel_Verilerin_Silinmesi_Yok_Edilmesi_veya_Ananonim_Hale_Getirilmes> i.pdf s.16 vd.

the reasons for processing no longer exist will be destroyed automatically, semi-automatically or manually.

# DISCLOSURE REGARDING THE PROCESSING OF PERSONAL DATA AND THE DATA SUBJECT'S RIGHTS UNDER THE LAW

* + 1. Informing the Data Subject

In accordance with Article 10 of the Law and the provisions of the Communiqué on the Procedures and Principles to be Complied with in Fulfillment of the Obligation to Inform published in the Official Gazette dated 10.03.2018, our Company informs the personal data owners *- data subjects -* during the acquisition of personal data. In this context, as stated above, if any, the Company informs about the identity of the representative, the purpose for which personal data will be processed, to whom and for what purpose the processed personal data can be transferred, the method and legal reason for collecting personal data and the rights of the data subject.

# Rights of the Data Subject under the Law

Our Company informs you of your rights in accordance with Article 11 of the Law and the provisions of the Communiqué on the Procedures and Principles of Application to the Data Controller published in the Official Gazette dated 10.03.2018; provides guidance on how to exercise such rights and carries out the necessary internal functioning, administrative and technical arrangements for all these. Pursuant to Article 11 of the Law, our Company discloses to the data subjects that they have the following rights;

* To learn whether personal data is being processed,
* To request information if their personal data has been processed,
* To learn the purpose of processing the personal data and whether they are used in line with this purpose,
* being informed of the third persons to whom the personal data is transferred within and out of the country,
* To request correction of personal data in case of incomplete or incorrect processing,
* To request the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of the Law,
* To request notification of the transactions made pursuant to subparagraphs (d) and (e) of Article 11 of the Law to third parties to whom personal data are transferred,
* To object to the emergence of a result to the detriment of the person himself/herself by analyzing the processed data exclusively through automated systems,
* To request compensation for damages in case of damage due to unlawful processing of personal data

You will be able to submit your requests regarding the implementation of the Law by using the **Personal Data Protection Law Data Subject Application Form**, which you can access at [www.icturservis.com](http://www.icturservis.com.tr), using the methods described in the application form. Pursuant to Article 13/2 of the Law, our Company finalizes the requests submitted to it free of charge as soon as possible and within thirty days at the latest, depending on the nature of the request. However, if the transaction in question requires an additional cost, the fee in the tariff determined by the Board may be charged.

Our Company may either accept your request or reject it by explaining its reasoning and notify its response in writing or electronically. In the event that your application is rejected, you find the response inadequate or your application is not responded to in due time; you have the right to file a complaint to the Board within thirty days from the date of learning about our response and in any case within sixty days from the date of application.

# CASES WHERE THE POLICY AND LAW WILL NOT APPLY IN WHOLE OR IN PART

This Policy and the provisions of the Law shall not apply in the following cases pursuant to Article 28(1) of the Law:

* Processing of personal data by natural persons within the scope of activities related to themselves or their family members living in the same residence, provided that personal data are not disclosed to third parties and the obligations regarding data security are complied with.
* Processing the personal data for the purposes of investigation, planning and statistics by anonymizing with official statistics.
* Processing personal data within the context of artistic, historical, literary or scientific purposes or freedom of speech provided that the personal data does not breach the national defence, national security, public safety, public order, economic security and confidentiality of private life or personal rights, and does not constitute a crime.
* Processing the personal data within the scope of preventive, protective and intelligence operations executed by state institutions and organizations so authorized by the law to ensure national defence, national security, public safety, public order or economic security.
* Processing of personal data by judicial or enforcement authorities in relation to investigations, prosecutions, trials or executions.

Provided that it is appropriate and proportionate to the purpose and basic principles of this Policy and the Law, Articles 10 regulating the obligation of the data controller to disclose,

11 regulating the rights of the data subject, except the right to claim compensation for the damage, and 16 regulating the obligation to register with the Data Controllers Registry will not be applied in the following cases in accordance with Article 28/2 of the Law:

* Processing of personal data is necessary for the prevention of crime or criminal investigation.
* Processing of personal data made public by the data subject himself/herself.
* In case personal data processing is necessary for the execution of supervisory or regulatory duties and disciplinary investigation or prosecution by authorized and authorized public institutions and organizations and professional organizations in the nature of public institutions based on the authority granted by law.
* Where the processing of personal data is necessary for the protection of the economic and financial interests of the State in relation to budgetary, tax and fiscal matters.

# CLASSIFICATION OF DATA SUBJECTS AND MATCHING THEM WITH PERSONAL DATA

* + 1. Classification of Data Subjects

Only real persons can benefit from the protection of this Policy and the Law in accordance with Article 3 of the Law; in this context, the data subjects are grouped as follows: **Employee Candidate:** Natural persons who have applied for a job to our company by any means or who have opened their resume and related information to our company's review.

**Group Company Customer:** Persons whose personal data are obtained through IC İbrahim Çeçen Yatırım Holding A.Ş. Group Companies.

**Company Business Partner, Shareholder, Officer, Employee of Business Partners:** All natural persons with whom our Company has any kind of business relationship and all natural persons, including employees, shareholders and officials of natural and legal persons (such as business partners, suppliers) with whom our Company has any kind of business relationship.

**Company Customer:** Natural persons who use or have used the products and services offered by our Company, regardless of whether they have any contractual relationship with our Company.

**Potential Customer:** Real persons who have made a request or interest in using our products and services or who have been evaluated in accordance with the rules of commercial practice and honesty that they may have this interest.

**Company Employee:**Real persons working for İçtur Servis Limited Şirketi and its affiliated companies.

**Company Shareholder:** The shareholders of İçtur Servis Limited Şirketi and its subsidiaries.

**Company Official:** Board members and other authorized persons of İçtur Servis Limited Şirketi and its affiliated companies.

**Third Person:** Other persons who are not covered by the İçtur Servis Limited Şirketi Policy prepared for Company Employees and who are not included in any category of data subject in this Policy.

**Visitor:** All real persons who have entered the physical premises owned by our Company for various purposes or who visit our websites for any purpose.

* + 1. **Matching Personal Data with Data Subjects, Data Controller and Data Processors,** The matching of the classified personal data, the definitions and scopes of which are given above, with the classified personal data subjects are as follows.

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| Data  Categories | Data Contents | Data Subject |
| Identity information | All information clearly belonging to an identified or identifiable natural person; processed partially or completely automatically or non-automatically as part of the data recording system; All information contained in documents such as Driver's License, Identity Card, Residence Card, Passport, Lawyer ID, Marriage Certificate | Company Shareholder; Company Official; Company Customer; Group Company Customer; Potential Customer; Company Business Partner, Shareholder, Official, Employee of Business Partners; Employee Candidate; Visitor, Third Parties. |
| Contact information | Information such as telephone number, address, e-mail, which clearly belongs to an identified or identifiable natural person; processed partially or completely automatically or non-automatically as part of the data recording system | Company Shareholder; Company Official; Company Customer; Group Company Customer; Potential Customer; Company Business Partner, Shareholder, Official, Employee of Business Partners; Employee Candidate; Visitor, Third  Parties. |
| Customer data | Information (customer number, etc.) that clearly belongs to an identified or identifiable natural person, processed partially or completely automatically or non-automatically as part of the data recording system; information obtained about the person concerned by the customer's authorized person or employee as a result of our commercial activities and the operations carried out by our business units within this framework | Potential Customer, Customer, Visitor, Third Parties. |

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| Customer transaction information | Information that clearly belongs to an identified or identifiable natural person and is included in the data recording system; such as records for the use of our products and services and the instructions and requests of the customer required for the use of products and services | Potential Customer, Customer, Visitor, Third Parties. |
| Physical space security information | Personal data related to records and documents (entry and exit logs, visit information, etc.) that clearly belong to an identified or identifiable natural person and are included in the data recording system; records and documents taken at the entrance to the physical space, during the stay in the physical space | Company Shareholder; Company Official; Company Customer; Group Company Customer; Potential Customer; Company Business Partner, Shareholder, Official, Employee of Business Partners; Employee Candidate; Visitor, Third Parties. |
| Transaction security information | Your personal data (such as website password and password information), which clearly belongs to an identified or identifiable natural person and is included in the data recording system; processed for the purposes of ensuring the realization of technical, administrative, legal and commercial obligations while conducting our commercial activities | Company Shareholder; Company Official; Company Customer; Group Company Customer; Potential Customer; Company Business Partner, Shareholder, Official, Employee of Business Partners; Employee Candidate; Visitor, Third Parties. |
| Risk management information | Personal data that clearly belongs to an identified or identifiable natural person and is included in the data recording system; personal data processed through methods used in accordance with generally accepted legal, commercial customs and good faith in these areas in order to manage our commercial, technical and administrative risks | Company Shareholder; Company Official; Company Customer; Group Company Customer; Potential Customer; Company Business Partner, Shareholder, Official, Employee of Business Partners; Employee Candidate; Visitor, Third Parties. |
| Financial information | Personal data of the Customer's officer or employee regarding information, documents and records showing all kinds of financial results of the Customer, which clearly belong to an identified or identifiable natural person, processed partially or completely automatically or non-automatically as part of the data recording system | Company Shareholder; Company Official; Company Customer; Group Company Customer; Potential Customer; Company Business Partner, Shareholder, Official, Employee of Business Partners; Employee Candidate; Visitor, Third Parties. |

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| Personal Information | All kinds of personal data that clearly belong to an identified or identifiable natural person, processed partially or completely automatically or non-automatically as part of the data recording system; processed to obtain information that will be the basis for the formation of the personal rights of natural persons who are in a working relationship with the Company | Company Business Partner, Business Partners' Official, Employee; Employee Candidate, Third Parties. |
| Location Information | Information (GPS location, travel data, etc.) that clearly belongs to an identified or identifiable natural person, processed partially or completely automatically or non-automatically as part of the data recording system; information that determines the location of the relevant person during the use of the Company's products and services within the framework of the operations carried out by the Company's business units or the location of the employees of the institutions we cooperate with while using Company vehicles | Company Shareholders, Officers, Employees, Business Partners, Shareholder, Officer, Employee of Business Partners |
| Sensitive Personal Information | Information that clearly belongs to an identified or identifiable natural person, processed partially or fully automatically or non-automatically as part of the data recording system; data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data | Company Shareholder; Company Official; Company Customer; Group Company Customer; Potential Customer; Company Business Partner, Shareholder, Official, Employee of Business Partners; Employee Candidate; Visitor, Third Parties. |

Pursuant to Article 6 of the Regulation, the titles, units and job descriptions of those involved in the processes of storing and disposing personal data in our Company within the scope of the PDP Law are included.

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| Data Processing Units | Job Descriptions |
| Human Resources Unit /Personnel Directorate | * Interviewing Employee Candidates, * Keeping the employment contracts made with the Company's employees and the personnel files of the Employees, * Preparation of internal personnel regulations and their distribution to employees, |
| Procurement Unit | * Purchase of products and services needed by the Company in line with the Company's   objectives. |
| Legal Unit | * Ensuring the legal infrastructure required by the Company's business and operations, * Execution of transactions related to legal disputes   concerning the Company, |
| Information Technologies Unit | * Taking necessary measures for the security of the devices used in the Company, * Carrying out maintenance and repair works of the devices used and especially software, * Authorization of remote access to the devices, software and databases used, * Providing contractors with access to, managing, |

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|  | controlling and supervising these devices, software and databases within the scope of contracts for the maintenance, update, integration and repair of devices, software and databases,   * VPN routing and authorizations, * Interference with electronic devices. |
| Finance and Accounting Unit | * Recording salary information and payment information that should be known within the scope of personal rights of employees, * Recording of expenditure information for the Company's activities. |