

## CORPORATE PERSONAL DATA PROTECTION POLICY

Document Information	
<b><u>Document Name:</u></b>	<b>Personal Data Protection Policy</b>
<b><u>Document Relevance:</u></b>	<b>The purpose of the Personal Data Protection Policy is the planning of the procedures for protecting personal data and determining the rules to be applied in this matter by Akın Yazılım Bilgisayar İthalat İhracat Sanayi ve Ticaret Ltd. Şti.</b>
<b><u>Date Published:</u></b>	<b>01.12.2020</b>
<b><u>Version No:</u></b>	<b>1</b>
<b><u>Reference / Justification:</u></b>	<b>Personal Data Protection Act Number 6698 and other legislation,</b>
<b><u>Approval Authority:</u></b>	<b>As Akın Yazılım Bilgisayar İthalat İhracat Sanayi ve Ticaret Ltd. Şti. Board of Directors</b>

### 1. PURPOSE

The right of every individual to demand the protection of personal data about himself/herself is a sacred right arising from the Constitution. As Akın Yazılım Bilgisayar İthalat İhracat Sanayi ve Ticaret Ltd. Şti. , we consider fulfilling the requirements of this right as one of our most valuable duties. For this reason, we attach importance to the processing and protection of your personal data in accordance with the law.

As a result of the importance we attach to the protection of personal data, Corporate Personal Data Protection Policy has been prepared in order to determine the principles and procedures we apply while processing and protecting personal data.

### 2. SCOPE

The Policy covers all kinds of processes related to obtaining, recording, storing, retaining, changing, revising, disclosing, transferring, taking over, classifying the personal data managed by Akın Yazılım Bilgisayar İthalat İhracat Sanayi ve Ticaret Ltd. Şti. and taking them over by wholly or partially automated means or by nonautomated means provided that they are a part of any data recording system or prevention of their utilization.

The policy is related to all personal data of the partners, officers, solution partners, customers, supplier officers and employees of Akın Yazılım Bilgisayar İthalat İhracat Sanayi ve Ticaret Ltd. Şti. and third parties that are processes.

As Akın Yazılım Bilgisayar İthalat İhracat Sanayi ve Ticaret Ltd. Şti. may change the Policy to comply with the legislation and the decisions of the Personal Data Protection Authority and to better protect personal data.

### 3. DEFINITIONS

<b>Abbreviation</b>	<b>Description</b>
<b>Buyer Group</b>	The category of natural or legal persons to whom personal data is transferred by the data controller.
<b>Explicit Consent</b>	Consent about a specific subject based on information and expressed in free will
<b>Anonymization</b>	Making personal data not to be associated with any identified or identifiable real person in any way, even when paired with other data.
<b>Related Person</b>	Real person whose personal data are processed
<b>Relevant User</b>	The persons who process personal data within the organization of the data controller or in accordance with the authorization and instruction received from the data controller, except the person or unit responsible for the storage, protection and backup of the data technically.
<b>Destruction</b>	Deletion, destruction or anonymization of personal data.
<b>Law / KVKK</b>	Law on Protection of Personal Data No. 6698
<b>Recording Medium</b>	Any environment in which personal data are processed, which are fully or partially in automated ways or non-automated ways provided that being part of any data recording system.
<b>Personal Data</b>	All kinds of information relating to an identified or identifiable real person.

<b>Data Inventory</b>	It means the inventory created and elaborated by data controllers by associating personal data processing activities carried out by data controllers depending on the business processes and personal data processing purposes and the legal reason with the data category, the transferred recipient group and the data subject group, and where they explain the maximum retention period required for the purposes for which the personal data is processed, the personal data foreseen to be transferred to foreign countries and the measures taken regarding data security.
<b>Processing of Personal Data</b>	All kinds of processes performed on data including acquisition, recording, storing, retaining, modifying, re-arranging, disclosing, transmission, taking over, making available, classifying or prevention of use through fully or partially automated ways or through non-automated ways, provided that these are part of any data recording system.
<b>Board</b>	Protection of Personal Data Board
<b>Institution</b>	Protection of Personal Data Authority
<b>Delicate Personal Data</b>	It means personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership of associations, foundations or trade-unions, information relating to health, sexual life, convictions and security measures, and the biometric and genetic data.
<b>Periodic Destruction</b>	In the event that all the processing conditions of personal data in the Law disappear, the process of erasure, destruction, or anonymization of the personal data that will be carried out at regular intervals specified in the storage and destruction policy.
<b>Policy</b>	Personal Data Protection Policy
<b>Data Processor</b>	Real and legal person who processes personal data on behalf of the data controller with the authorization invested by the data controller.
<b>Data Controller</b>	Real or legal person who determines the purposes and means of personal data processing and in charge of establishing and managing the data recording system.

#### **4. GENERAL PRINCIPLES**

Akın Yazılım Bilgisayar İthalat İhracat Sanayi ve Ticaret Ltd. Şti. checks the compliance of the data to be processed in the preparation phase of each new personal data processing workflow with the following principles. Workflows that are not found suitable are not implemented.

Akın Yazılım Bilgisayar İthalat İhracat Sanayi ve Ticaret Ltd. Şti. complies with the following when processing personal data;

- (I) It shall abide by the law and the rules of honesty.
- (II) Ensure that personal data are accurate and, when necessary, up-to-date.
- (III) Pays attention to the fact that the purpose of the processing is specific, clear and legitimate.
- (IV) Checks that the processed data is linked for the purpose of processing, that it is processed to the extent that it needs to be processed, and that it is measured.
- (V) Preserves the data only as required by the relevant legislation or for the purpose of processing, and destroys it when the purpose of processing disappears.

#### **5. MEASURES TAKEN FOR DATA SECURITY**

As Akın Yazılım Bilgisayar İthalat İhracat Sanayi ve Ticaret Ltd. Şti. takes all necessary technical and administrative measures (i) to prevent personal data being processed unlawfully, (ii) to prevent unlawful access to personal data, (iii) to ensure the appropriate level of security in order to preserve personal data.

##### **5.1. Technical Measures**

- (I) Network security and application security are provided.
- (II) Security measures are taken within the scope of supply, development and maintenance of information technology systems.
- (III) Access logs are kept regularly.
- (IV) Current anti-virus systems are used.
- (V) Firewalls are used.
- (VI) Necessary security measures are taken for entering and exiting physical environments containing personal data.
- (VII) It is ensured that physical environments containing personal data are protected against external risks (fire, flood etc.).
- (VIII) The security of media containing personal data is ensured.
- (IX) Personal data is backed up and security of the personal data backed up is also ensured.
- (X) User account management and authority control system are implemented and these are also followed-up.
- (XI) Log records are kept without user intervention.
- (XII) Intrusion detection and prevention systems are used.
- (XIII) Encryption is done.

##### **5.2. Administrative Measures**

- (I) There are disciplinary regulations that include data security provisions for employees.
- (II) Training and awareness studies are carried out at certain intervals on data security for employees.
- (III) Corporate policies on access, information security, usage, storage and disposal have been prepared and implemented.
- (IV) The data masking measure is applied when necessary.

- (V) Confidentiality commitments are made.
- (VI) An authority matrix has been created for employees.
- (VII) Employees who have been resigned or who have left their jobs have been deauthorized.
- (VIII) Signed agreements contain data security provisions.
- (IX) Personal data security policies and procedures have been established.
- (X) Personal data security issues are reported quickly.
- (XI) Personal data security is monitored.
- (XII) Personal data is reduced as much as possible.
- (XIII) In-house periodic and / or random audits are performed and caused to be performed.
- (XIV) Existing risks and threats have been identified.
- (XV) Protocols and procedures for personal data security have been determined and implemented.
- (XVI) If personal data of special nature are to be sent via e-mail, they are necessarily sent encrypted and using KEP or corporate mail account.
- (XVII) Awareness of data processing service providers on data security is ensured.

## **6. RIGHTS OF THE RELATED PERSON ABOUT PERSONAL DATA**

The relevant person may apply to Akın Yazılım Bilgisayar İthalat İhracat Sanayi ve Ticaret Ltd. Şti., and make a request on the following issues:

- (I) Learning whether the personal data have been processed or not,
- (II) Request information if her/his personal data has been processed,
- (III) Learn the purpose of processing of the personal data and whether data are used in accordance with their purpose;
- (IV) Learning the third parties inside and outside the country to whom the personal data are transferred,
- (V) To request rectification in case your personal data has been processed incompletely or inaccurately and to request notification of the transaction made within this context to third parties to whom your personal data has been transferred,
- (VI) To request deletion, destruction or anonymization of personal data in case the reasons that require processing have been eliminated despite the fact that it has been processed in accordance with the KVKK and other relevant legal provisions and to request notification to the third parties to whom personal data has been transferred,
- (VII) To object to any application response against himself/herself, resulting from the analysis of processed data exclusively by the automatic systems
- (VIII) To claim compensation in case of suffering loss due to illegal processing of the personal data.

## **7. VIOLATION NOTICES**

As Akın Yazılım Bilgisayar İthalat İhracat Sanayi ve Ticaret Ltd. Şti. employees shall report works, actions or events that he/she believes to have violated the provisions of LPPD and/or Policy to the Management. The committee will convene after this violation notification, if it deems necessary, and prepare an action plan regarding the violation.

If the violation has occurred through the unlawful acquisition of personal data to others, the Management will notify this situation to the relevant person and the Board **within 72 hours within the scope of Board decision dated 24.01.2019 and numbered 2019/10.**

## **8. CHANGES**

The changes on the policy are prepared by the Management and submitted to the approval of Akın Yazılım Bilgisayar İthalat İhracat Sanayi ve Ticaret Ltd. Şti. Board of Directors. The Updated Policy may be sent to employees via e-mail or posted on the website.

## **9. EFFECTIVE DATE**

This version of the Policy has been approved by the Board of Directors and entered into force on 01.12.2020.