



**ALTAY YAZILIM SAVUNMA ENDÜSTRİYEL SANAYİ  
VE TİCARET A.Ş.  
POLICY OF PROTECTION AND PROCESSING OF  
PERSONAL DATA**

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## A. INTRODUCTION

The purpose of this instruction is to implement and secure the requirements of the Law No. 6698 on the Personal Data Protection Law published in the Official Gazette dated 07.04.2016.

### 2. Introduction to Policy

Protection of personal data is one of the most important priorities of Altay Yazılım Savunma Endüstriyel Sanayi ve Ticaret Anonim Şirketi ("Company" or "Altay"). The most important stage of this subject is that protection and processing of the personal data, which is governed by this policy, of our customers, potential customers, employee candidates, employees, company shareholders, company officials, visitors, and employees, shareholders and officials of the corporations which we are in cooperation, and third parties.

According to Turkey's Constitution, everyone has the right to request the protection of his/her personal data. As regards the protection of personal data, which is a constitutional right, Altay takes due care for protection of the personal data, which is governed by this policy, of our customers, potential customers, employee candidates, employees, company shareholders, company officials, visitors, and employees, shareholders and officials of the corporations which we are in cooperation, and third parties and adopts this issue as a company policy.

In this context, necessary administrative and technical measures are taken by Altay for the protection of personal data processed in accordance with the relevant legislation.

This Policy will provide detailed explanations of the basic principles listed below which Altay adopted for processing of personal data:

- To process personal data in accordance with the rules of law and good faith,
- To keep personal data accurate and up-to-date,
- To process personal data for specific, clear and legitimate purposes,
- To process personal data relevant, limited and proportionate to the processing purposes,
- To store personal data for the period of time stated in the applicable legislation or the period required for the purpose of processing.
- To enlighten and inform the personal data owners,
- To establish the system necessary for the personal data owners to exercise their rights,
- To take necessary precautions for the protection of personal data,
- To act in accordance with the relevant legislation and the Personal Data Protection Board regulations in transferring the personal data to third persons in the direction of the requirements of the purposes for processing the personal data,

- To show the required sensitivity to the processing and protection of personal data of a specific nature.

### 3. Purpose

The main purpose of this Policy is to explain about the systems adopted by Altay for the processing activities of personal data and protection of personal data carried out in accordance with the law in a legal manner and in this context to inform the persons whose personal data are processed by our company especially our customers, potential customers, employee candidates, employees, company shareholders, company officials, visitors, and employees, shareholders and officials of the corporations which we are in cooperation, and third parties and to ensure transparency.

### 4. Scope

This Policy is related to related to all personal data of our customers, potential customers, employee candidates, employees, company shareholders, company officials, visitors, and employees, shareholders and officials of the corporations which we are in cooperation, and third parties processed by automatic or non-automatic means provided that they are part of any data recording system.

While the application scope of this Policy regarding the personal data owners included in the categories specified above can be all of the Policy (e.g. our Active customers who are also our Visitors); it can also be only some part of the provisions (e.g. such as Only Our Customers).

### 5. Definitions

**Personal Data Protection Law (PDPL):** Personal Data Protection Law No. 6698 published in the Official Gazette dated 07.04.2016.

**European Union General Data Protection Regulation (GDPR):** EU (European Union) General Data Protection Regulation

**Constitution:** Constitution of the Turkish Republic numbered 2709 and dated November 7th, 1982 published in the Official Gazette numbered 17863 and dated November 9th, 1982.

**Data Processor:** The person who processes the personal data in accordance with the authority and instruction received from the data controller or within the organization of the data controller except the person or department responsible for storage, protection and backup of the data technically.

**Data Owner / Relevant Person (s):** All real persons, including shareholders and officials of the companies, which a business relationship exists, working in these companies (including but not limited to business partner and supplier).

**Data Controller:** Natural or legal person who determines the purposes and means of the processing of personal data, and who is responsible for establishment and management of the filing system.

**Explicit Consent:** Freely given specific and informed consent;

**Destruction:** The process of deleting, destroying or anonymizing personal data.

**Recording Medium:** Any document containing personal data that is processed by completely or partially automatic or non-automatic means provided that they are part of any data recording system.

**Personal Data:** Any information related to the identified or identifiable real person.

**Special Categories of Personal Data:** Data relating to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of association, foundation or trade-union, health, sexual life, criminal conviction and security measures, and biometrics and genetics are special categories of personal data.

**Monitoring Personal Data:** Any kind of process such as acquiring, recording, storing, preserving, altering, rearranging, disclosing, transferring, taking over, making acquirable, classifying or prevention of usage on personal data through completely or partially automatic or non-automatic means provided that they are part of any data recording system.

**Anonymization of Personal Data:** Rendering personal data by no means identified or identifiable with a natural person even by linking with other data.

**Deletion of Personal Data:** The process of making personal data inaccessible and non-reusable for the relevant users.

**Destruction of Personal Data:** The process of making personal data inaccessible and non-reusable for anyone.

**Board:** Personal Data Protection Board.

**Institution:** Personal Data Protection Authority.

**Visitor:** Real people who have entered our physical campuses for various purposes or visited our internet sites.

**Employee Candidate:** Real persons who have applied for a job to our company or who have opened their curriculum vitae and relevant information for inspection of our company.

**Defense Industry Security Directive:** It has been published by the Ministry of National Defense in order to regulate the obligations and supervision of the organizations operating in the defense industry on 15 June 2011.

## 6. Implementation of the Policy and Related Legislation

Relevant statutory regulations in force on processing and protection of personal data will be implemented first. If there is a discrepancy between the legislation in force and the Policy, our Company agrees that the legislation in force will be implemented.

The policy was established through rearrangement of the rules set forth by the relevant legislation within the scope of the applications of Altay through materializing. Our company carries out the necessary systems and preparations to comply with the period of validity stipulated in the PDP Law.

## **B. ISSUES REGARDING THE PROTECTION OF PERSONAL DATA**

- ❖ Our company takes necessary technical and administrative measures to prevent the illegal processing of personal data that is being processed, to prevent illegal access to data and to ensure the appropriate level of security in order to ensure the preservation of data and make required audits or have them made in accordance with the provisions in the 5th section of the Defense Industry Security Directive and the 12th article of the PDP Law.

### **1. Ensuring Personal Data Security**

#### **1.1. Technical and Administrative Measures to Ensure Proper Processing of Personal Data**

In order to ensure the proper processing of personal data in accordance with the law, our Company all the procedures, which our company are required to fulfil pursuant to the Defense Industry Security Directive, are fulfilled and measures are taken regarding violation of these provisions besides technical and administrative measures considering technological facilities and implementation cost.

- **Technical Measures to Ensure Proper Processing of Personal Data**

The main technical measures taken by our Company to ensure that personal data are processed in accordance with the law are listed below:

- The personal data processing activities carried out in our company are audited by the established technical systems.
- The technical measures which are taken are periodically reported to the relevant authority as it is necessary for internal audit mechanism.
- Knowledgeable personnel in technical matters are employed .

- **Administrative Measures to Ensure Proper Processing of Personal Data**

The main administrative measures taken by our Company to ensure that personal data are processed in accordance with the law are listed below:

- Employees are informed and trained about the law on protection of personal data, personal data processing in accordance with law.
- All activities carried out by our company are analysed in detail in all business units and personal data processing activities are carried out in the context of the business activities performed by the related business units as a result of this analysis.

- Personal data processing activities carried out by the business units of our company and the procedures required to be performed and the audits to be made within the scope of the Defense Industry Security Directive; the requirements to be fulfilled in order to ensure compliance with the personal data processing conditions sought by PDP Law are determined specifically for each business unit and the detail activity carried out by this unit.
- In order to ensure the legal compliance requirements determined based on our business units, awareness is raised specific for relevant business units and the rules of implementation are determined; administrative measures required to ensure the continuity of the supervision and enforcement of these matters are taken through intercorporate policies and trainings.
- Records are created that provide the obligation not to process, disclose or use personal data, except for the Company's instructions and the statutory exceptions, in the contracts and the documents which govern the legal relationship between our company and the employees and the awareness of the employees is raised in this respect and audits are performed.

## **1.2. Technical and Administrative Measures to Prevent Illegal Access to the Personal Data**

Our company takes technical and administrative measures considering the nature of the data to be protected, technological facilities and implementation cost to prevent imprudent or unauthorized disclosure, access, transfer or other forms of illegal access of personal data.

- **Technical Measures to Prevent Illegal Access to the Personal Data**

The main technical measures to prevent illegal access to the personal data taken by our company are listed below:

- Technical measures adopting the developments in the technology are taken and the measures are periodically updated.
- Technical solutions for access and authorization are implemented in accordance with the legal compliance requirements determined based on business units.
- The technical measures which are taken are periodically reported to the relevant authority as it is necessary for internal audit mechanism and the issues which pose a risk are re-evaluated and the necessary technological solution is created.
- Software and hardware including antivirus systems and firewalls are installed.
- Knowledgeable personnel in technical matters are employed .

- **Administrative Measures to Prevent Illegal Access to the Personal Data**

The main administrative measures to prevent illegal access to the personal data taken by our company are listed below:

- Employees are trained about the technical measures to be taken to prevent illegal access to personal data.

- Access and authorization processes for personal data are designed and implemented within the Company in accordance with business unit-based legal compliance requirements.
- Employees are informed that they shall not disclose personal data they have learned to others in violation of the provisions of the PDP Law and shall not use for purposes other than for the purpose of processing, and that this obligation will continue after resigning and necessary commitments are taken in this direction.
- Provisions regarding the persons which the personal data are transferred shall take the necessary security measures for the purpose of protecting the personal data and ensure compliance with these measures in their own corporations are included in the contracts concluded with the persons which the personal data are transferred in accordance with the law by our company.
- The Company prepares a Visitor Handbook within the scope of the PDP Law and informs them about the access to their personal data and takes necessary commitments that the related information can be kept, transferred and processed.

### **1.3. Retention of Personal Data in a Secure Medium**

Our company takes necessary technical and administrative measures considering technological facilities and implementation cost to ensure retention of personal data in a secure medium and prevent its destruction, loss or amendment for illegal purposes.

- **Technical Measures for Retention of Personal Data in a Secure Medium**

The main technical measures for retention of personal data in a secure medium are listed below:

- Systems adopting the technological developments are used for retaining personal data in a secure medium.
- Expert personnel in technical matters are employed .
- Security systems are established for data storage areas and, the technical measures which are taken are periodically reported to the relevant authority as it is necessary for internal audit mechanism and the issues which pose a risk are re-evaluated and the necessary technological solution is created.
- Applicable backup programs are used to ensure that personal data is safely stored.
- All the measures which are obliged to be fulfilled within the scope of the Defense Industry Security Directive in terms of security measures are also applied in terms of the protection of personal data.

- **Administrative Measures for Retention of Personal Data in a Secure Medium**

The main administrative measures for retention of personal data in a secure medium are listed below:



- Employees are trained to ensure that personal data is safely stored.
- In case service is procured from outside because of the technical necessities regarding retention of personal data by our Company, provisions regarding the persons which the personal data are transferred shall take the necessary security measures for the purpose of protecting the personal data and ensure compliance with these measures in their own corporations are included in the contracts concluded with the companies which the personal data are transferred in accordance with the law by our company.

#### **1.4. Supervision of Measures Taken for Protecting Personal Data**

All activities carried out by Altay have been analysed in detail by all business units and a process-based personal data processing inventory has been prepared as a result of this analysis. Risky areas in this inventory are identified and necessary legal and technical measures are taken continuously within the scope of the above-mentioned issues.

The personal data processing activities performed by Altay are audited by information security systems, technical systems and legal methods, in particular the methods specified in the Defense Industry Security Directive.

Altay has established provisions on confidentiality and data security in the Labour Contracts to be signed in the recruitment process of employee candidates and audits employees regarding their compliance with these provisions. This Policy, which is an integral part of the Labour Contracts, are made available to all staff and partners.

Subcontractors of our Company are informed about the PDP Law and the necessary measures to be taken in accordance with his Law and they are periodically audited whether such measures are taken.

Contracts that Altay has concluded are re-evaluated within the scope of the PDP Law and necessary amendments are made.

In order to be cautious against the violation of any personal data security, we have worked on crisis management and designed the application process to our Company with the aim of informing Related Persons.

#### **1.5. Measures to be Taken in Case of Unauthorized Disclosure of Personal Data**

Our company executes a system which ensures notification of the data owner and the Board, if the personal data processed in accordance with the 12th article of the PDP Law is acquired by others through illegal ways .

If deemed necessary by the Board, this may be announced on the Board's website or by any other means.

**1. Protecting the Rights of Data Owners; Establishment of the Channels for Conveying These Rights to Our Company and Evaluation of Requests of Data Owners**

Our company establishes the necessary channels and executes internal operations, administrative and technical regulations in accordance with Article 13 of the PDP Law in order to evaluate the rights of personal data owners and to provide necessary information to the personal data owners.

Detailed information about the rights of Personal Data owners are included in the 10th section of this Policy.

**2. Protection of Special Categories of Personal Data**

Particular importance has been attached to the PDP Law and some personal data because of the risk of causing victimization or discrimination of persons when they are processed illegally.

These are data of race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of association, foundation or trade-union, health, sexual life, criminal conviction and security measures, and biometrics and genetics.

Our Company is sensitive to the protection of special categories of personal data which is determined as "special" by PDP Law and processed in accordance with the law. In this context, the technical and administrative measures taken by our Company for the protection of personal data are carefully applied with respect to special categories of personal data and necessary audits are provided within the Altay.

Detailed information on the processing of personalized personal data is included in Part C. of this Policy.

**C. ISSUES RELATED TO PROCESSING OF PERSONAL DATA**

- ❖ Our company executes personal data processing in accordance with Article 20 of the Constitution and Article 4 of the PDP Law, in compliance with the rules of law and good faith; accurate and up-to-date when necessary; for specific, clear and legitimate purposes; in relation with the purpose, in a limited and proportionate manner. Our company maintains personal data for as long as it is required by law or for the time required for the purpose of processing personal data.
- ❖ In accordance with Article 20 of the Constitution and Article 5 of the PDP Law, our company processes personal data on the basis of one or more of the conditions specified in Article 5 of the PDP Law.
- ❖ In accordance with Article 20 of the Constitution and Article 10 of the PDP Law, our Company enlightens personal data owners and informs personal data owners in case they request information.
- ❖ Our company complies with the regulations envisaged for the processing of special categories of personal data in accordance with Article 6 of the PDP Law.
- ❖ In accordance with Articles 8 and 9 of the PDP Law, our Company acts in compliance with the regulations set forth in the law and stipulated by the PDP Board regarding transfer of personal data.
- ❖ Since our company is operating in the field of defense industry, it complies with the regulations set forth by the Defense Industry Security Directive in order to protect the confidential information of all employee candidates, employees, subcontractors, employees of the subcontractors and all personnel serving as such.

## **1. Processing of Personal Data in Accordance with Principles in Legislation**

### **1.1. Processing in Conformity with The Law and Good Faith**

Our company; acts in accordance with the principles of legal regulation and the principle of general trust and good faith in the processing of personal data. In this context, our Company takes into account the proportionality requirements in the processing of personal data and does not use personal data except for the purpose it requires.

### **1.2. Ensuring that Personal Data is Accurate and Up-To-Date When needed**

Our company; ensures that the personal data, which is processed by considering the fundamental rights of the personal data owners and their own legitimate interests, are accurate and up-to-date. It takes the necessary precautions in this direction. In this context, all real persons whose data is processed by us can request information on whether their data are accurate and up-to-date by applying to our Company.

### **1.3. Processing for Specific, Open and Legitimate Purposes**

Our company clearly and precisely defines the purpose of processing data which is legitimate and justifiable. Our company processes in relation to the products and services it offers and as much as it is necessary for these. The purpose processing personal data by our company is set forth before the activity of processing personal data begins.

### **1.4. Being relevant, limited and proportionate to the purposes for which data are processed;**

Our company processes personal data in manner for realizing the determined purposes and avoids processing of personal data which are not relevant with the purpose or which are unnecessary. For example, personal data processing activities are not conducted to meet the needs that may arise later.

### **1.5. Storing only for the period designated by relevant legislation or necessitated by the purpose for which data are collected**

Our company store personal data only for the period of time stated in the applicable legislation or the period required for the purpose of processing. In this context, our Company firstly determines if a certain period of time is not set forth in the applicable legislation, and if a certain period of time is determined then it acts in accordance with this period, and if not, it will retain the personal data for the time required for the purpose. In the event of expiry or disappearance of the reasons for processing, the personal data are deleted, destroyed, or anonymised by our Company. Personal data are not stored by our Company based on the possibility of use in the future.

## **2. Processing of Special Categories of Personal Data**

Our Company is sensitive to the regulations set forth in the PDP Law in processing of personal data which is determined as "special" by PDP Law and processed in accordance with the law.

In Article 6 of the Law on PDP, a number of personal data bearing the risk of causing victimization or discrimination of persons when they are processed illegally have been designated as "private". These are data of race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of association, foundation or trade-union, health, sexual life, criminal conviction and security measures, and biometrics and genetics.

In accordance with PDP Law, our Company processes special categories of personal data in the following cases, provided that applicable measures to be determined by the Board are taken:

- If the personal data owner has an explicit consent or
- If the personal data owner does not have an explicit consent;
- Special categories of personal data except the ones on the personal data of the owner's health and sexual life, in cases prescribed by law,
- Special categories of personal data on the health and sexual life of the of the personal data owner can be transferred only to those who are under obligation to keep the information confidential or to the competent institutions and organizations for the purpose of public health protection, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

### **3. Transfer of Personal Data**

Our company can transfer the personal data and special categories of personal data the personal data owner to third parties (third party companies, group companies, third party real persons) by taking the necessary security precautions in accordance with the legal personal data processing purposes (see Section B / Title 1). In this respect, our company complies with the regulations set out in Article 8 of the PDP Law.

In case of transferring special categories of personal data, our company takes necessary security measures and take applicable measures set forth by the Board; special categories of personal data of the personal data owners can only be transferred to the third parties in cases which is set forth in the law or explicit consent of the person is received for the purposes of legal personal data processing.

- If the personal data owner has an explicit consent or
- If the personal data owner does not have an explicit consent;
- Special categories of personal data except the ones on the personal data of the owner's health and sexual life (data of race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of association, foundation or trade-union, criminal conviction and security measures, and biometrics and genetics), in cases prescribed by law.

- Special categories of personal data on the health and sexual life of the of the personal data owner can be processed by only those who are under obligation to keep the information confidential or by the competent institutions and organizations for the purpose of public health protection, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

#### 4. Transfer of Personal Data Abroad

Our company can transfer the personal data and special categories of personal data the personal data owner to third parties resident abroad (by taking the measures set forth by the Board) by taking the necessary security precautions in accordance with the legal personal data processing purposes (see Section B / Title 1.1). Personal data are transferred to foreign countries which are declared as having adequate level of protection by the Board (Foreign Country Which have Adequate Level of Protection) or if there is no adequate level of protection, then personal data is transferred to the foreign countries which an adequate level of protection is undertaken in writing by the data controllers in the relevant foreign country and in Turkey (Foreign Country of the Data Controller who has undertaken the adequate level of protection) In this respect, our company complies with the regulations set out in Article 8 of the PDP Law. Detailed information about this issue is included in the Section E of this Policy.

Detailed information about the personal data processing cases which allows transfer of the personal data are included in the Section F of this Policy.

#### D. CATEGORIZATION , PROCESSING PURPOSES AND RETENTION PERIODS OF THE PROCESSED PERSONAL DATA

❖ In accordance with Article 10 of the PDP Law, our company informs the personal data owners about which personal data owner groups' personal data are processed, the processing purposes of the personal data of the personal data owners and the retention periods using the required means within the scope of obligation to inform.

##### 1. Categorization of Personal Data

The personal data indicated in the following categories limited with the periods within this Policy in compliance with all the obligations regulated in the PDP Law and especially the principles stated in the article 4 of the Law regarding processing of the personal data limited with and based on one or more than one of the personal data processing conditions stated in the article 5 of the Law in the direction of the legitimate and justifiable personal data processing purposes of our Company are processed through informing the relevant persons in accordance with the article 10 of the PDP Law by our Company.

PERSONAL DATA CATEGORIZATION	DESCRIPTIONS
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<b>Identity Information</b>	All information in documents such as driver's license, identity card, residence paper, passport, attorney's identity, marriage certificate
<b>Contact information</b>	Information such as phone number, address, email
<b>Location Data</b>	Location information of all our personnel active in the defense area including our employees within the scope of the Defense Industry Security Directive and the information which is detected while our employees use the vehicles of our Company or while the personal data owner uses our products and services.
<b>Customer information</b>	All information obtained and produced about the person concerned as a result of our Defense Industry activities and the operations carried out by our business units in this framework
<b>Family Members and Relatives Information</b>	All information about family members and relatives of the personal data owner in order to protect the legal interests of the Company and the data owner concerning the products and services we provide
<b>Customer Operations Information</b>	Records about the use of our products and services, as well as instructions for the customer about the use of products and services and his/her requests
<b>Workplace Safety Information</b>	Personal data regarding records and documentation which are required to be taken pursuant to the Defense Industry Security Directive while entering to and staying in our workplace.
<b>Operation Security Information</b>	Personal data required to be processed in order to ensure our technical, administrative, legal and commercial security while carrying out all our activities including Defense Industry
<b>Risk Management Information</b>	Personal data processed through used methods in accordance with legal, commercial customs and good faith accepted generally in these fields in order to manage our technical and administrative risks
<b>Financial Information</b>	Personal data on the information, documents and records that show any financial result created according to the type of legal relationship that our company has established with the personal data owner
<b>Employee Personal Information</b>	Any personal data processed to obtain information that is essential to the creation of employee personal rights of our employees or the real persons who are in labour relationship with our Company
<b>Employee and Employee Candidate Information</b>	Personal data processes regarding the individuals who are in labour relationship with our Company and/or the ones who have applied for being an employee of our Company and/or are considered as employee candidate in the direction of the human sources needs of our company and/or the employees engaged to our Company with labour contract.
<b>Fringe Benefits and Interests</b>	Personal data processed for the purpose of the planning of the fringe benefits and interests that we offer to our employees or other real persons who are in labour relationship with our Company, the determination of the objective criteria related to their entitlement, and following their entitlement
<b>Legal Transaction and Compliance Information</b>	Personal data processed within the scope of determination of legal claims and rights, performance of obligations and compliance with legal duties and policies of our company
<b>Audit and Inspection Information</b>	Personal data processed within the scope of compliance with legal obligations and policies of our company
<b>Special Categories of Personal Data</b>	The data set out in Article 6 of the PDP Law
<b>Marketing Information</b>	Personal data processed for the customization and marketing of our products and services according to the usage habits, likes and needs of the personal data owner and the reports and evaluations created as a result of these processing.
<b>Request/Complaint</b>	Personal data on the receipt and evaluation of any requests or

<b>Management Information</b>	complaints directed to our company
<b>Event Management Information</b>	Information and evaluations gathered about events that have the potential to affect our company, employees, shareholders in any way
<b>Audio / Visual Data</b>	Data included in the photographs and camera recordings (except records within the scope of Workplace Safety Information), voice recordings, and copies of documents containing personal data

## 2. Processing Purposes of Personal Data

Our company processes personal data limited to the purposes and conditions in the personal data processing terms set forth in paragraph 2 of article 5 and paragraph 3 of article 6 of the PDP Law. These purposes and conditions are;

- It is clearly set forth in the Laws that our Company shall be involved in the processing of personal data,
- Processing of personal data by our Company is directly related to the establishment or execution of a contract,
- Processing of personal data is compulsory for our Company to fulfil its legal obligation,
- Provided that the personal data is revealed to public by the data owner; processing of the data revealed to public by our Company limited with the purpose,
- Processing of personal data by our Company is compulsory for the establishment, use or protection of the rights of our Company or data owners or third parties,
- It is compulsory for our Company to involve in personal data processing activities for its legitimate interests on the condition that avoiding giving damage to the basic rights and freedoms of the data owners,
- Processing of personal data by our Company is necessary in order to protect the life or physical integrity of the data owner or another person where the data owner is incapable of giving consent because of physical impossibility or legal invalidity.
- Special categories of personal data except the ones on the personal data of the owner's health and sexual life, in cases prescribed by law,
- Special categories of personal data on the health and sexual life of the of the personal data owner are processed by only those who are under obligation to keep the information confidential or by the competent institutions and organizations for the purpose of public health protection, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

In the absence of the above conditions; the Company applies to the personal data owners' explicit consent to engage in personal data processing activities.

Our company processes personal data for the purposes in the following within the scope of execution of the necessary activities by our related business units and execution of the related business processes for the realization of the activities carried out by the company; to ensure the legal, technical and commercial security of the Company and the persons involved in the business relationship with the Company; planning and execution of the activities required for the presentation and promotion of the services offered by the company to the persons concerned by customizing them according to their likes and needs; the fulfilment of the obligations of the Defense Industry Security Directive in respect of the activities carried out by the Company within the scope of the defense industry; planning and conducting commercial and / or business strategies of the Company; execution of the necessary work to be done by our business units and operation of related business processes for the related persons to benefit from the products and services offered by the company; planning and execution of the company's human resources policies and processes.

- Planning and execution of emergency management processes
- Planning, supervision and execution of information security processes
- Planning, supervision and execution of processes related to the Personal Security Clearance which should be taken in accordance with the Defense Industry Security Directive
- Establishment and management of defense and software technology infrastructure
- Planning and execution employee satisfaction and / or loyalty processes
- Planning and execution of fringe benefits and interests for employees
- Planning and execution of information access authorizations of the employees
- Follow-up and / or supervision of employees' business activities
- Event management
- Follow-up of finance and / or accounting works
- Follow-up of legal affairs
- Planning of human resources processes
- Planning and conducting business activities
- Planning and execution of the information access authorizations of business partners and / or suppliers
- Management of relationships with business partners and / or suppliers
- Planning and execution of corporate communication activities
- Planning and / or execution of corporate risk management activities
- Planning and execution of institutional sustainability activities



- Planning and execution of corporate governance activities
- Planning, supervision and execution of activities carried out with the Ministry of National Defense
- Planning and execution of customer relationship management processes
- Planning and / or follow-up of customer satisfaction processes
- Follow up of Customer requests and/or complaints
- Execution of staff procurement processes
- Fulfilment of obligations arising from the labour contract and / or legislation for the Company employees
- Ensuring the security of company fixtures and / or resources
- Planning and execution of company audit activities
- Planning and execution of internal and external training activities
- Planning and execution of the operational activities necessary for ensuring company's activities to be carried out in accordance with the Company's procedures and /or applicable legislation
- Planning and execution of intercorporate appointment, promotion and cease of employment processes
- Ensuring the security of the company settlement (camera recordings etc. to be made in accordance with the Defense Industry Safety Directive)
- Planning and / or execution of financial risk processes of the Company
- Planning and / or execution of operational risk processes of the Company
- Follow-up of contractual procedures and / or legal requirements
- Execution of the strategic planning activities
- Planning and execution of the human resource needs necessary for our activities to be carried out
- Ensuring that the data are accurate and up-to-date
- Giving information to authorized persons and / or organizations (e.g. Ministry of Defense) based on the legislation
- Creation and follow-up of visitor records

A significant part of the activities carried out by our Company in the context of these purposes are the activities and processes which do not require the explicit consent of the personal data owner

mentioned in sub paragraph 5 of Article 5 and paragraph 3 of Article 6 of the Law. Our Company also receives explicit consent of the personal data owner for its activities and processes that are not covered by the law. It should not be forgotten that personal data received in this framework may be used by our Company for activities that do not require the explicit consent for data processing, as well as those that require explicit consent in the Law.

In the event that the personal data owner does not grant explicit consent, it shall not be understood that all the data processing activities within the scope of the purpose indicated above cannot be performed by our relevant business units, instead, it shall be understood that the data processing activities except the ones which do not require explicit consent of the personal data owner indicated in the first paragraph within the scope of the same purpose, cannot be performed.

### **3. Retention Periods of the Personal Data**

Our company retains personal data for the period specified the legislations if it is set forth in related laws and legislations. If a period of time has not been set in the legislation on how long personal data should be stored, personal data will be deleted, destroyed or anonymized after processing as long as it is necessary for our applications of our Company and according to the commercial customs depending on the services our company offer while processing those data.

If the purpose of processing the personal data has concluded and if the retention period determined by the applicable legislation and company has ended, personal data may only be kept in case they have evidential value in possible legal disputes or for the purpose of claiming the relevant right regarding the personal data or creating a defense. Timeouts for claiming the mentioned rights and the cases in the requests directed to our Company on the same issues before although the timeout periods have lapsed are based on in determining the retention periods. In this case, the stored personal data is not accessed for any other purpose and access to the personal data is enabled only when it is necessary to use in the legal dispute. When the period in question has ended in this case the personal data are deleted, destroyed or anonymized.

### **E. CATEGORIZATION ON PERSONAL DATA OWNERS**

While the personal data of the personal data owner categories listed below are processed by our company, the application scope of this Policy is limited with our customers, potential customers, employee candidates, employees, company shareholders, company officials, visitors, and employees, shareholders and officials of the corporations which we are in cooperation, and third parties.

While the categories of persons whose personal data are processed by our company is within the scope stated above, persons outside of these categories may direct their requests to our Company within the scope of the PDP Law and the requests of these persons will be evaluated within this Policy.

Below, the concepts of customer, potential customer, visitor, employee, employee candidate, shareholder and board of directors member, real persons in the corporation which we are in cooperation, and third parties related with these persons are clarified.

<b>Personal Data Owner Category</b>	<b>Explanation</b>
<b>Customer</b>	Regardless of whether there is a contractual relationship with our Company, the real persons who have used the products and services offered by our Company
<b>Potential Customer</b>	Real persons who are interested in or have interested or are considered to be interested in accordance with commercial customs and good faith in our products and services
<b>Visitor</b>	Real people who have entered our physical campuses owned by our Company or the ones where an organization is conducted for various purposes or visited our internet sites.
<b>Third Party</b>	Third party real persons (e.g. Voucher, Companion, Family Members and Relatives) related with the persons in question in order to ensure commercial operation security between the parties mentioned above or protect the rights of the mentioned persons and afford advantage or other real person not included within the scope of this Policy.
<b>Employee</b>	All real persons working in our company or in our affiliates with labour contract
<b>Employee Candidate</b>	Real persons who have applied for job to our Company by any means or opened their cv and relevant information for examination of our Company
<b>Company Shareholder</b>	Real persons who are shareholders of our company or real person representatives of legal person shareholders
<b>Company official</b>	Board of directors member of our company and other real persons authorized by our Company
<b>Employees, Shareholders and Officials of The Corporations Which We Are in Cooperation With,</b>	Real persons, including shareholders and officials of the companies, which a business relationship exists, working in these companies (including but not limited to business partner and supplier).

The table below elaborates the categories of personal data owners mentioned above and which types of personal data are processed for the persons in these categories

<b>PERSONAL DATA CATEGORIZATION</b>	<b>CATEGORY OF DATA OWNER WHO HAS A RELATION WITH THE RELEVANT PERSONAL DATA</b>
<b>Identity Information</b>	Customer, Potential Customer, Employee, Employee Candidate, Company Shareholder, Company official, Visitor, Employees, Shareholders and Officials of The Corporations Which We Are in Cooperation With, Third Party
<b>Contact information</b>	Customer, Potential Customer, Employee, Employee Candidate, Company Shareholder, Company official, Visitor, Employees, Shareholders and Officials of The Corporations Which We Are in Cooperation With, Third Party
<b>Location Data</b>	Customer, Employee, Employee Candidate, Employees of The Corporations Which We Are in Cooperation With
<b>Customer information</b>	Customer, Potential Customer
<b>Family Members and Relatives Information</b>	Customer, Visitor, Employee, Employee Candidate, Third Party, Employees, Shareholders and Officials of The Corporations Which We Are in Cooperation With,
<b>Customer Operations</b>	Customer, Potential Customer

<b>Information</b>	
<b>Physical Location Security Information</b>	Visitor, Employee, Employee Candidate, Company Officials, Employees, Shareholders and Officials of The Corporations Which We Are in Cooperation With,
<b>Operation Security Information</b>	Customer, Potential Customer, Employee, Employee Candidate, Company Shareholder, Company official, Visitor, Employees, Shareholders and Officials of The Corporations Which We Are in Cooperation With
<b>Risk Management Information</b>	Customer, Potential Customer, Employee, Employee Candidate, Company Shareholder, Company official, Visitor, Employees, Shareholders and Officials of The Corporations Which We Are in Cooperation With, Third Party
<b>Financial Information</b>	Customer, Employee, Company Shareholder, Company Official, Company Shareholder, Employees, Shareholders and Authorities of Officials of The Corporations Which We Are in Cooperation With,
<b>Employee Personal Information</b>	Employee, Employees, Shareholders and Authorities of Officials of The Corporations Which We Are in Cooperation With,
<b>Employee Candidate Information</b>	Employee Candidate, Employee Candidates of The Corporations Which We Are in Cooperation With,
<b>Fringe Benefits and Interests</b>	Employee, Employee Candidate, Employees of The Corporations Which We Are in Cooperation With,
<b>Legal Transaction and Compliance Information</b>	Customer, Potential Customer, Employee, Employee Candidate, Company Shareholder, Company official, Visitor, Employees, Shareholders and Officials of The Corporations Which We Are in Cooperation With, Third Party
<b>Audit and Inspection Information</b>	Customer, Potential Customer, Employee, Employee Candidate, Company Shareholder, Company official, Visitor, Employees, Shareholders and Officials of The Corporations Which We Are in Cooperation With, Third Party
<b>Special Categories of Personal Data</b>	Customer, Employee, Employee Candidate, Company Shareholder, Company Official, Employees, Shareholders and Officials of The Corporations Which We Are in Cooperation With,
<b>Marketing Information</b>	Customer, Potential Customer
<b>Request/Complaint Management Information</b>	Customer, Potential Customer, Employee, Employee Candidate, Company Shareholder, Company official, Visitor, Employees, Shareholders and Officials of The Corporations Which We Are in Cooperation With, Third Party

#### **F. THIRD PERSONS TO WHOM THE PERSONAL DATA ARE TRANSFERRED AND THE TRANSFER PURPOSES**

❖ In accordance with Article 10 of the PDP Law, our company informs the personal data owners about the person groups which the personal data are transferred.

In accordance with Articles 8 and 9 of the PDP Law, our Company can transfer the personal data of the data owners to the following person categories;

- Business partners,
- Suppliers,
- Associates,
- Shareholders,

- Legally Authorized public institutions and organizations,
- Legally authorized private persons

The scope of the above-mentioned persons involved in the transfer and the purpose of data transfer are explained in detail below.

Persons to Whom Data Can Be Transferred	Definition	Purpose of Data Transfer
<b>Business partner</b>	The parties which a business partnership is established for the aim of executing our programs in various issues such as promotion and marketing regarding our products and services while executing activities of our Company.	Data may be transferred in a limited manner in order to ensure that the establishment purposes of the business partnership are fulfilled.
<b>Supplier</b>	The parties that offer services to our Company on a contractual basis in accordance with the orders and instructions of our Company while executing the commercial activities of our Company.	Data may be transferred in a limited manner in order to fulfil the commercial activities of our Company and the activities procured from the outside supplier by our Company.
<b>Our shareholders</b>	Companies that are and / or will be our company's shareholder.	Data may be transferred limited with ensuring the conduct of business activities that require participation of our company's future affiliates.
<b>Legally Authorized Public Institutions and Organizations,</b>	Public institutions and organizations authorized to obtain information and documents from our Company in accordance with the provisions of the relevant legislation. For example, the Ministry of National Defense.	Data may be transferred in limited manner for the purpose requested by the relevant public institutions and organizations within the legal authority.
<b>Legally Authorized Private Persons</b>	Private persons authorized to obtain information and documents from our Company in accordance with the provisions of the relevant legislation	Data may be transferred in limited manner for the purpose requested by the private persons within the legal authority.

Our Company executes the transfers in accordance with the provisions set out in sections B and C of the Policy.

#### **G. PROCESSING PERSONAL DATA BASED ON THE PROCESSING PROCEDURES IN THE LAW AND LIMITED TO THESE TERMS**

❖ In accordance with Article 10 of the PDP Law, our company informs the personal data owners about processed personal data and receives their explicit grants through various systems.

#### **1. Processing of Personal Data and Special Categories of Personal Data**

## 1.1. Processing of Personal Data

The explicit consent of the owner of the personal data is only one of the legal basis that make it possible for the personal data to be processed in accordance with the law. Apart from explicit consent, personal data may be processed in the presence of one of the other conditions listed below. While the basis of personal data processing activity may be only one of the conditions specified below, more than one of these conditions may be the basis for the same personal data processing activity. If the processed data is special categories of personal data; The conditions contained below in the 1.2 Title shall apply.

Although the legal basis for the processing of personal data by our Company differs, all personal data processing activities are carried out in accordance with the general principles set forth in Article 4 of the PDP Law (see Section C. Subheading 1).

- **Explicit Consent of the Personal Data Owner Is Available**

One of the conditions for the processing of personal data is the explicit consent of the owner. Explicit consent of the personal data owner shall be freely given specific and informed consent;

If any of the provisions included in the b., c., d., e., f., g. and h. of this title, which is on the reasons to acquire the personal data, is not available, these personal data processing activities are carried out by our Company on the basis of an explicit consent of the personal data owner for these processing activities.

In order for personal data to be processed in accordance with the explicit consent of the personal data owner, explicit consent shall be obtained from the data owner through legal methods determined by the Company.

- **Explicit Stipulation in the Law**

The personal data of the data owner may be processed in accordance with the law if it is stipulated explicitly in the Law.

- **Explicit Consent of the Personal Data Owner Is Not Available Due to Physical Impossibility**

In case it is necessary to process personal data in order to protect the life or physical integrity of the data owner or another person where the data owner is incapable of giving consent because of physical impossibility or validity of his/her consent cannot be legitimized, personal data of the data owner may be processed.

- Example: The blood group information of the employee who fainted is given to the doctors by his friends

- **Direct relation to the establishment or performance of the contract**

Personal data may be processed if it is necessary to process personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract.

- **Fulfilling Legal Obligations of the Company**

The data owner's personal data may be processed if it is compulsory for our company to fulfil its legal obligations as being the data controller.

- Example: Providing the necessary information for the personnel to obtain Personal Security Clearance in accordance with the Defense Industry Security Directive

- **Revealing the Personal Data to Public by the Personal Data Owner**

If the data owner has revealed his/her personal data to public, then the relevant personal data may be processed.

- **Compulsory Data Processing for the Establishment or Protection of a Right**

The data owner's personal data may be processed if it is compulsory for establishment, use or protection of a right.

- Example: Storing data which have evidential value (procurement contract, invoice, etc.) and using it when necessary

- **Compulsory Data Processing for legitimate interests of our Company**

The personal data of the data owner may be processed if data processing is compulsory for legitimate interests of our Company provided that the fundamental rights and freedoms of the data owner are not harmed.

- Example: Data processing for the aim of intercorporate accounting by the accountancy

## **1.2. Processing of Special Categories of Personal Data**

If the personal data owner does not have an explicit consent, our Company processes special categories of personal data only in the following cases, provided that applicable measures to be determined by the Board are taken:

(i) Special categories of personal data except the ones on the personal data of the owner's health and sexual life, in cases prescribed by law,

(ii) Special categories of personal data on the health and sexual life of the of the personal data owner can be processed by only those who are under obligation to keep the information confidential or by the competent institutions and organizations for the purpose of public health protection, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing.

## **H. PERSONAL DATA PROCESSING ACTIVITIES CARRIED OUT IN THE BUILDING, AT THE WORKPLACE ENTRANCES AND IN THE WORKPLACE BUILDING AND INTERNET VISITORS**

- ❖ The personal data processing activities carried out at the entrance of the workplace buildings and inside by the Company are carried out in accordance with the Constitution, PDP Law, the Defense Industry Security Directive and other related legislation.

In order to ensure safety by our company, our Company performs surveillance activity with the security camera in the workplace building and personal data processing activities towards for following the visitor entrances and exits. In addition, there is card a pass system at the entrances and exits of the Company.

Personal data processing activities are carried out by our Company through surveillance cameras, using the card pass system and recording visitor entrance and exits in the direction of improving the service quality, ensuring reliability, protecting safety of life and property of our Company, data owners and other third parties and establishing legitimate interests of these persons.

## **1. Surveillance Activity Carried Out with the Camera in the Building, Workplace Entrances and Inside**

In this section, our company's camera surveillance system will be explained, and information will be provided on how personal data, confidentiality and fundamental rights of persons are protected.

Within the scope of our surveillance activity with security camera; it is aimed to improve the service quality, ensure reliability, protect safety of life and property of our Company, data owners and other persons and protecting the legitimate interests of these persons.

### **1.1. Legal Basis of Camera Surveillance System**

Camera surveillance activities carried out by our Company are executed in accordance with the Law on Private Security Services and related legislation and the Defense Industry Safety Directive.

### **1.2. Execution of Security Camera Surveillance Activity in Accordance with the PDP Law**

Regulations in the PDP Law are adopted in executing the camera surveillance activities for security reasons by our Company.

Our company performs security camera surveillance activities in accordance with the personal data processing conditions stated in the PDP Law for the purposes set forth in the laws in order to ensure security in the Company building.

### **1.3. Informing About the Camera Surveillance Activity**

In accordance with Article 10 of the PDP Law, our company informs the personal data owners.

In addition to the informing on the general provisions by our Company (See Section C/ Sub Title 1.3) notifications on the camera surveillance activity are made using more than one method.

Thus, it is aimed to prevent harm to the fundamental rights and freedoms of the personal data owner, to ensure transparency and informing the personal data owner.

For the camera surveillance activities executed by our Company; this policy is published on the web site of our Company (online Policy regulation) and the obligation to inform is fulfilled by putting



notification about the surveillance on the visitor booklet and entrances to the areas where surveillance will be made.

#### **1.4. The Purpose of Camera Surveillance Activity and The Limitedness to This Purpose Principle**

Our company processes personal data relevant, limited and proportionate to the processing purposes, in accordance with the article 4 of the PDP law.

The purpose of maintaining the video camera surveillance by our company is limited to the purposes listed in this Policy and the Defense Industry Safety Directive. In this respect, the surveillance areas, number of security cameras and when to make surveillance shall be sufficient to reach the security purposes and it shall be put into practice limited with this purpose. Areas which may lead to intervention to the privacy of the persons going beyond the security purposes are not subject to surveillance.

Within this framework, necessary technical and administrative measures are taken in accordance with the article 12 of the PDP law, all our personnel are informed regarding the issue and all the visitors are enlightened on the issue that they are being monitored.

#### **1.5. Retention Period of Personal Data Obtained by Camera Surveillance Activity**

Detailed information about the retention period of the data acquired through the camera surveillance activity has been included in Section 3 of this Policy, Section 3, "Personal Data Retention Periods".

#### **1.6. Who Can Access the Information Obtained as A Result of The Monitoring and To Whom It Is Transferred**

Only limited number of our employees have access to recordings that are recorded and retained in the digital environment. Our security officers watch the live camera footages. Limited number of persons with access to the records are under the obligation to protect the confidentiality of the data within the confidentiality agreement.

### **2. Monitoring of visitor entrances and exits executed in the building, workplace entrances and inside**

Personal data processing activity is carried out aimed at monitoring visitor entrances and exits in our workplace by our Company to ensure security and for the purposes stated in this Policy.

The Visitor Booklets provided by our security officers while the entrances the personal data of the visitors which has come to the Altay building informs the personal data owners in question in this respect. The data obtained for visitor entrance-exit monitoring is processed only for this purpose and the related personal data are recorded in the data recording system in the physical and / or electronic environment.

### **3. Retention of Records of Internet Access Provided to Our Visitors in Our Company Building**

Internet access can be provided to our visitors who demand during the period of staying in the building by our company to ensure security and for the purposes stated in this Policy. In this case, the log records of your internet accesses are recorded according to the provisions of the Law Numbered 5651 and the legislation regulated according to this law; these records are processed only in case it is requested by authorized public institutions or to fulfil our legal obligations in the audit processes to be performed within the Company.

Only a limited number of employees have access to the log records obtained in this framework. Company employees who have access to the log records access to these records only upon the request received from the authorized public institutions and organizations or for use in the audit processes and share with the legally capable persons. Limited number of persons with access to the records are under the obligation to protect the confidentiality of the data within the confidentiality agreement.

#### **4. Website Visitors**

Our company records online interactions on the website which is owned by our company are recorded through technical means (e.g. cookies) in order to engage in online advertisement activities and present customized contents; and ensure that the persons visiting this site to realize their visit in accordance with their visiting purposes. Detailed explanations regarding the protection and processing of personal data regarding these activities that our company has performed are described in the "*Altay Yazılım Savunma Endüstriyel Sanayi ve Ticaret A.Ş. Website Privacy Policy*".

#### **I. DELETING, DESTROYING OR ANONYMIZING PERSONAL DATA**

- ❖ Personal data shall be deleted, destroyed or anonymized referring to the own decision of our Company or upon the request of the personal data owner in case the reasons which require the processing of the data have disappeared although they are processed in accordance with the relevant provisions of law regarding the article 138 of the Turkish Penal Code and article 7 of the PDP Law.
- ❖ Our company reserves the right for nonfulfillment of the request of the data owner in cases it has a right and/or an obligation to retain the personal data pursuant to the article 5/2 of the PDP Law and the provisions of the Defense Industry Security Directive.

#### **1. Deleting and Destroying Techniques for Personal Data**

##### **1.1. Physical Destruction**

Personal data can also be processed in non-automatic ways provided that it is part of any data recording system. When such data are deleted / destroyed, a system for physical destruction is applied so that the personal data cannot be used later.

##### **1.2. Deleting Securely from Software**

When the data processed in completely or partially automatic means and stored in digital media is deleted / destroyed; methods towards deleting the data in a non-recoverable way from the relevant software are used.

### **1.3. Secure Deleting by Experts**

In some cases, our company may agree with an expert to delete personal data on its behalf. In this case, the personal data is deleted / destroyed safely by the expert in such a way that it cannot be recovered.

## **2. Techniques of Anonymizing Personal Data**

Anonymizing of personal data is to make it impossible to be associated with any identified or identifiable person in any way, even if the personal data is matched with other data. Our company can anonymize personal data when the reasons for processing personal data processed in accordance with the law disappear.

In accordance with Article 28 of the PDP Law, anonymized personal data may be processed for research, planning and statistics purposes. Such processing are outside the scope of the PDP Law, and the explicit consent of the personal data owner will not be sought. The rights set forth in Part I of the Policy will not apply to this data, since the personal data processed by making it anonymous will be excluded from the scope of the PDP Law.

### **2.1. Masking**

Data masking is a method of anonymizing the personal data by extracting the key determinant information of the personal data from the data set.

### **2.2. Consolidation**

Many data are consolidated with data consolidation method and personal data are made impossible to be associated with anyone.

### **2.3. Data Derivation**

Through data derivation, more general content is created from the content of the personal data and it is ensured that personal data is made in a manner that is not associated with any person.

### **2.4. Data Shuffling, Permutation**

Through data shuffling, bond between values and persons are broken down by mixing values in a personal data set.

## **J. RIGHTS OF PERSONAL DATA OWNERS; USE AND EVALUATION OF THESE RIGHTS**

- ❖ Our Company reports the rights of the personal data owner to him/her in accordance with Article 10 of the PDP Law and guides the personal data owner on how to use these rights and our company establishes the necessary channels and executes internal operations, administrative and technical regulations in accordance with Article 13 of the PDP Law in order to evaluate the rights of personal data owners and to provide necessary information to the personal data owners.

## **1. Data Owner's Rights and Use of These Rights**

### **1.1. Personal Data Owner Rights**

Personal data owners have the following rights:

- To learn whether or not her/his personal data have been processed;
- To request information as to processing if her/his data have been processed;
- To learn the purpose of processing of the personal data and whether data are used in accordance with their purpose;
- To know the third parties in the country or abroad to whom personal data have been transferred;
- To request of correction in case personal data are processed incompletely or inaccurately and request notification of the rectifications made to the third parties to whom personal data have been transferred;
- To request of deletion or destruction of personal data within the framework of the conditions set forth in Personal Data Protection Law and request notification of the operations made as per indents and to third parties to whom personal data have been transferred;
- To raise objections against any consequences against you that may arise as a result of analysis of the processed data solely and exclusively through automatic systems,
- To request and claim indemnification of your damages because of the damages as a result of illegal processing of the Personal Data,

### **1.2. Cases Which Personal Data Owners Cannot Claim the Rights in Question**

since the following cases are excluded from the Law on PDP according to article 28 of the PDP Law, personal data owners cannot claim the rights stated in sub-title 1.1.

- Personal data is processed for the purpose of official statistics and for research, planning and statistical purposes after having been anonymized.,
- Personal data is processed with artistic, historical, literary or scientific purposes, or within the scope of freedom of expression provided that national defence, national security, public security, public order, economic security, right to privacy or personal rights are not violated or they are processed so as not to constitute a crime
- Personal data is processed within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations duly authorised and assigned to maintain national defence, national security, public security, public order or economic security.

- Personal data is processed by judicial authorities or execution authorities with regard to investigation, prosecution, criminal proceedings or execution proceedings.
- Personal data is processed within the scope of the activities which our company is obliged to perform pursuant to the Defense Industry Security Directive by way of transferring the data in question to the Ministry of National Defense.

In accordance with Article 28/2 of the PDP Law; except for the right to claim damages of personal data owners in the following cases, they cannot claim for the rights stated in the 1.1.:

- It is required for the prevention of a crime or crime investigation
- It is carried out on the data which is made public by the data subject himself.
- It is required for inspection or regulatory duties and disciplinary investigation and prosecution to be carried out by the public institutions and organizations and by professional associations having the status of public institution, assigned and authorised for such actions, in accordance with the power conferred on them by the law,
- It is required for protection of State's economic and financial interests with regard to budgetary, tax-related and financial issues.

### **1.3. Personal Data Owners' Use of the Rights in Question**

Personal data owners may submit the Application Form on the website of our Company free of charge by filling and signing which is prepared with the methods specified below and the other methods determined by the Board including the information and documents which will specify their identities and the requests regarding the rights stated in a detailed manner above.

In this context, after filling the application form, personal data holders may submit a wet signed copy to Kavaklıdere Mahallesi, Kızılırmak Cd. No: 2, 06640 Çankaya / Ankara or to the (\*) address with electronic signature.

It is not possible for third parties to claim on behalf of personal data owners.

In order for a person other than the owner of the personal data to submit the request, a special power of attorney issued through a notary by the personal data owner in the name of the person who will make the application shall be submitted.

If the transaction requested by the owner of the personal data requires a cost, our company will charge the fee specified by the Board. The procedure for depositing this fee will be indicated on the Application Form. If this fee is not deposited in accordance with the prescribed procedure, the applications will not be considered.

### **1.4. Personal Data Owners Right to File a Complaint to the Board**

If the application is rejected pursuant to Article 14 of the PDP Law, if the answer is found to be inadequate or the application is not answered within the time limit, a complain may be filed to the

Board within thirty days after the response is received and within 60 days after the application date in any case.

## **2. Answering to Applications by our Company**

### **2.1. Answering Procedure and Period**

In case the personal data owner conveys his/her request to our Company in accordance with the procedure stated in the title 1.3., our Company shall conclude the relevant request as soon as possible with regard to the nature of the request at most within thirty days.

Our company may request information from the person concerned in order to conclude the request and to determine whether the applicant is personal data owner.

Our company may address questions relating to the application of personal data owner to clarify the issues in the application of the personal data owner.

### **2.2. Our Company's Right to Reject the Application of the Personal Data Owner**

Our company may refuse the application of the applicant by explaining the reason in the following cases:

1. Personal data is processed for the purpose of official statistics and for research, planning and statistical purposes after having been anonymized.,
2. Personal data is processed with artistic, historical, literary or scientific purposes, or within the scope of freedom of expression provided that national defence, national security, public security, public order, economic security, right to privacy or personal rights are not violated or they are processed so as not to constitute a crime
3. Personal data is processed within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations duly authorised and assigned to maintain national defence, national security, public security, public order or economic security.
4. Personal data is processed by judicial authorities or execution authorities with regard to investigation, prosecution, criminal proceedings or execution proceedings.
5. Personal data is processed within the scope of the activities which our company is obliged to perform pursuant to the Defense Industry Security Directive by way of transferring the data in question to the Ministry of National Defense.
6. It is required for the prevention of a crime or crime investigation
7. It is carried out on the data which is made public by the data subject himself.
8. It is required for inspection or regulatory duties and disciplinary investigation and prosecution to be carried out by the public institutions and organizations and by professional associations

having the status of public institution, assigned and authorised for such actions, in accordance with the power conferred on them by the law,

9. It is required for protection of State's economic and financial interests with regard to budgetary, tax-related and financial issues.
10. The possibility that the request of the personal data owner may hinder the rights and freedoms of others
11. Requests requires disproportionate effort required to accomplish,
12. The information requested is an information open to the general public.