

**AYGAZ A.Ş.**

**PERSONAL DATA PROTECTION AND  
PROCESSING POLICY**

**10/07/2016**

**AYGAZ A.Ş. PERSONAL DATA PROTECTION AND  
PROCESSING POLICY INFORMATION SHEET**

**Name of the Document:**

AYGAZ A.Ş. Personal Data Protection and Processing Policy

**Target Group:**

All real persons whose personal data is processed by AYGAZ A.Ş. except for employees of AYGAZ A.Ş.

**Prepared by:**

AYGAZ A.Ş. Personal Data Protection Committee

**Version:**

1.0

**Approved by:**

Gökhan Tezel / Chief Executive Officer

Ferda Erginođlu / Deputy Chief Financial Officer

**Effective Date:**

10/07/2016

In case of a discrepancy between the original Policy in the Turkish language and a translation in another language, the Turkish text shall prevail.

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## **1. SECTION 1 – INTRODUCTION**

### **1.1. INTRODUCTION**

Protection of personal data a top priority for our Company. The most important aspect of this issue is the protection and processing of personal data belonging to our customers, potential customers, employee candidates, company shareholders, company officers, visitors, employees, shareholders and officials of organizations we collaborate with and third parties as governed by this Policy. Our Company's activities related to the protection of the personal data of our employees are governed by the AYGAZ Employee Personal Data Protection and Processing Policy drawn up in parallel with this Policy.

According to the Constitution of the Republic of Turkey, everyone has the right to request the protection of his/her personal data. AYGAZ conducts due diligence and maintains a Company policy for the protection of the personal data of its customers, potential customers, employee candidates, company shareholders, company officers, visitors, employees, shareholders and officials of organizations it collaborates with, and third parties as governed by this Policy and as guaranteed by the Constitution.

AYGAZ takes the necessary administrative and technical measures to ensure the protection of personal data processed in accordance with the applicable legislation.

This Policy contains a detailed explanation of the following basic principles adopted by AYGAZ in the processing of personal data:

- Personal data processing must be lawful and conform to the principles of good faith,
- Personal data must be accurate and updated as necessary,
- Personal data must be processed for clear, specific and legitimate purposes,
- Personal data processing must be related to, limited to and reasonably required for the purpose of processing,
- Personal data must be stored for the period stipulated in the applicable legislation or necessary for the purpose of processing,
- Personal data subjects must be informed,
- The required system must be established for the exercise of rights by personal data subjects,
- Necessary measures must be taken to protect personal data,
- The applicable legislation and regulations of the Board of Protection of Personal Data ("PPD Board") must be observed in the transfer of personal data to third parties in accordance with the purpose of processing,
- Due diligence must be conducted in processing and protection of sensitive personal data.

## **1.2. PURPOSE OF THE POLICY**

The primary purpose of this Policy is to describe the mechanisms adopted for the lawful processing and protection of personal data by AYGAZ, and ensure transparency by informing individuals whose personal data is processed by our Company including our customers, potential customers, employee candidates, company shareholders, company officers, visitors, employees, shareholders and officials of organizations we collaborate with and third parties.

## **1.3. SCOPE**

This Policy applies to all personal data belonging to our customers, potential customers, employee candidates, company shareholders, company officers, visitors, employees, shareholders and officials of organizations we collaborate with, and third parties which is processed by automated or non-automated (provided that such processing is part of a data recording system of any kind) means.

This Policy may apply to personal data subject groups that fall under the categories provided above in its entirety (e.g. Active customers also including Visitors) or in part (e.g. Some provisions that apply only to our Visitors).

## **1.4. IMPLEMENTATION OF THE POLICY AND APPLICABLE LEGISLATION**

Implementation of the applicable legal regulations regarding the processing and protection of personal data will be a priority. In case of a discrepancy between applicable legislation and the Policy, our Company acknowledges that the applicable legislation will prevail.

The Policy has been created by objectifying the rules stipulated by the applicable legislation within the framework of AYGAZ applications. Our Company maintains the necessary mechanism and preparations to act in accordance with the effective periods stipulated by the Law on Protection of Personal Data ("PPD Law"). (See ATTACHMENT 3)

## **1.5. POLICY EFFECTIVE DATE**

This Policy issued by our company took effect on October 7, 2016. The Policy effective date will be updated when the entire Policy or certain provisions are renewed.

The Policy is published on our Company's website ([www.aygaz.com.tr](http://www.aygaz.com.tr)) and made available to personal data subjects upon request.

## **2. SECTION 2 - PROVISIONS FOR PROTECTION OF PERSONAL DATA**

Our Company takes the necessary administrative and technical measures and performs or ensures that the necessary inspections are performed in accordance with Article 12 of the PPD Law in order to prevent unlawful processing of personal data and unauthorized access to the same and to ensure that the data is safeguarded.

### **2.1. ENSURING THE SECURITY OF PERSONAL DATA**

Our Company takes the necessary legal, technical and administrative measures and exercises utmost care to ensure data security within the framework of the provisions provided below. The actions and measures taken by our company to ensure "data security" pursuant to Article 12 of the PPD Law are listed below.

Our Company takes technical and administrative measures in line with technical capabilities and implementation costs to ensure lawful processing of personal data.

- Employees are informed that they cannot disclose personal data they acquire to third persons and use it for purposes other than the purpose of processing in breach of the provisions of the PPD Law, and that their liability will continue after termination of employment, and the necessary commitments are obtained from them.
- Our Company takes technical and administrative measures in line with the nature of the data to be protected, technical capabilities and implementation costs to prevent negligent or unauthorized disclosure or transfer of or otherwise unlawful access to personal data.
- Our Company raises awareness with its business partners, dealers and suppliers to whom it transfers personal data about preventing unlawful processing of personal data, avoiding unauthorized access to data, and ensuring lawful storage of data.
- The liabilities our Company has to meet in processing personal data as the data controller and the obligation to comply with the legal, technical and administrative measures it has taken on the matter are contractually imposed on data processing organizations (suppliers, business partners, etc.) with which our company collaborates in parallel with their data processing operations.
- Our Company takes technical and administrative measures in line with technical capabilities and implementation costs to ensure that personal data are stored in safe environments, and to prevent the unlawful destruction, loss or modification of the same.

- Our Company performs the necessary inspections or has them performed independently as per Article 12 of the PPD Law. The results of these inspections are reported to the relevant department within the Company's operational structure and the necessary actions are taken to improve the measures.
- In accordance with Article 12 of the PPD Law, our Company operates a system to ensure personal data subjects and the PPD Board are quickly notified of unlawful acquisition of personal data processed.

## **2.2. PROTECTING THE RIGHTS OF THE DATA SUBJECT, ESTABLISHING CHANNELS FOR THE COMMUNICATION OF SUCH RIGHTS TO OUR COMPANY AND HANDLING DATA SUBJECTS' REQUESTS**

Our Company maintains the necessary channels, internal processes, administrative and technical arrangements for evaluating the rights of personal data subjects and informing personal data subjects as required by Article 13 of the PPD Law.

The requests of personal data subjects with respect to the rights listed below and submitted to our Company in writing are handled free of charge and as soon as possible but not later than thirty days depending on the nature of the request. However, if the operation requires additional costs, our Company will charge fees at the rates set by the PPD Board.

Personal data subjects have the right to

- Ask for confirmation of whether the personal data of the Data Subject is being processed,
- Request information on how personal data is being processed,
- Request information about the purpose of processing personal data and whether the use of such data conforms to this purpose,
- Request a list of the third parties at home or abroad to whom personal data is transferred,
- Request correction of inaccurate or incomplete personal data which is subject to processing, and request that the third parties to whom personal data is transferred be notified of such correction,
- Request deletion or destruction of personal data which has been processed in accordance with the provisions of the PPD Law and other applicable laws when data is no longer needed for the original processing purposes, and request that the third parties to whom personal data is transferred be notified of such deletion or destruction,
- Object to conclusions drawn against the Data Subject merely by automated analysis of the processed data,
- Request indemnification of any loss the Data Subject incurs as a result of unlawful processing of personal data.

In accordance with Article 13/1 of the PPD Law, you are required to submit your requests to exercise the aforementioned rights "in writing" or via another method determined by the PPD Board. Since there is currently no other method determined by the PPD Board, you must submit your application in writing in accordance with the mandatory provision of the PPD Law.

When submitting your request to exercise the aforementioned rights, specifying the **necessary personally identifiable information** and your explanation of the right that you wish to exercise and stating which right set forth in Article 11 of the PPD Law that your request is related to will facilitate a quick and effective response to your request.

The channels and methods you will use to submit in writing your requests to exercise the rights specified in Article 11 of the PPD Law to our Company in accordance with Article 13 of the PPD Law are described below.

You can submit your request to exercise the rights specified in Article 11 of the PPD Law with your remarks and **personally identifiable documents** in person by completing the form at [https://www.aygaz.com.tr/App\\_Themes/Aygaz/pdf/Aygaz\\_Veri\\_Sahibi\\_Basvuru\\_Formu.pdf](https://www.aygaz.com.tr/App_Themes/Aygaz/pdf/Aygaz_Veri_Sahibi_Basvuru_Formu.pdf) and sending a signed copy of the form to "*Büyükdere Caddesi, No:145/1, Zincirlikuyu 34394 İstanbul, Türkiye*", or sending it via through a notary public or using other methods specified in the PPD Law, or e-mailing the relevant form with electronic secure signature to [aygaz@aygaz.hs02.kep.tr](mailto:aygaz@aygaz.hs02.kep.tr) .

### **2.3. PROTECTING SENSITIVE PERSONAL DATA**

The PPD Law places a special emphasis on some categories of personal data because of the risk of causing unjust or discriminatory treatment when unlawfully processed. Such sensitive data include data that reveal race, ethnic origin, political opinion, philosophical views, religion, sect or other beliefs, appearance, membership in an association, foundation or union, health status, sex life, criminal conviction and security measures, as well as biometric and genetic data.

Our Company conducts due diligence with respect to the protection of "sensitive personal data" as defined by the PPD Law and which are processed in accordance with the law. In this context, technical and administrative measures taken to protect personal data are carefully implemented by our Company with respect to sensitive personal data, and the necessary inspections are carried out.

Section 3 of this Policy describes in detail how sensitive personal data is processed.

## **2.4. INFORMING THE PERSONAL DATA SUBJECT**

Our Company informs personal data subjects of the collection of personal data in accordance with Article 10 of the PPD Law. In this context, personal data subjects whose personal data are collected are informed about the identity of our Company, for what purposes personal data will be processed, to whom personal data may be transferred and the purpose of the transfer, the method and legitimate grounds for collection of personal data, and the rights to which the personal data subject is entitled in accordance with Article 11 of the PPD Law.

Article 20 of the Constitution establishes everyone's right to be informed about their personal data. Therefore, the rights of the personal data subject set forth in Article 11 of the PPD Law also include the right to "request information". Our Company provides information to personal data subjects when requested in accordance with Article 20 of the Constitution and Article 11 of the PPD Law.

In addition, with this Policy and other publicly available documents, our Company declares that it processes personal data in line with all of the provisions of the PPD Law, and the principle of "law and good faith", thus informing concerned parties about its personal data processing activities and ensuring accountability and transparency. Also, our Company informs concerned parties of its activities and the provisions of the PPD Law via various other methods, especially when it asks for "express consent" of the data subjects.

## **2.5. RAISING AWARENESS IN BUSINESS UNITS ABOUT THE PROTECTION AND PROCESSING OF PERSONAL DATA AND INSPECTION**

Our Company offers training to its business units to raise awareness about preventing unlawful processing of personal data, avoiding unauthorized access to data, and protecting data.

Necessary systems are built and professionals are hired when necessary for awareness-raising activities about the protection of personal data for current employees of business units at our Company or those who have recently joined business units.

The results of the training to raise awareness in the business units of our Company about the protection and processing of personal data are reported to our Company. To that end, our Company assesses participation in the training, seminars, and briefing sessions, and performs the necessary inspections or has them performed independently. Our company updates and renews the training in parallel with updates to the applicable legislation.

## **2.6. RAISING AWARENESS WITH BUSINESS PARTNERS ABOUT THE PROTECTION AND PROCESSING OF PERSONAL DATA AND INSPECTION**

Our Company collaborates with various business partners including our dealers in offering products and services. Personal data shared with our dealers by the customer is, as a rule, transferred to our Company to be stored in the relevant systems, and our Company has no access to such personal data. As the “data processor” defined in the PPD Law, our Company will only store such personal data on behalf of its dealers, and will not directly perform any operation on personal data. If express consent is obtained from our customers for transfer and use of their personal data by our Company as specified in the PPD Law, personal data shared with our dealers will be transferred to our Company for processing as stipulated under express consent.

Our Company offers training and seminars to its business partners to raise their awareness about preventing unlawful processing of personal data, avoiding unauthorized access to data, and safeguarding data.

Training our company offers to its business partners is repeated periodically, and the necessary systems are built and professionals are hired when necessary for awareness-raising activities regarding the protection of personal data targeted at current and new employees of business partners.

The results of the training to raise awareness with the business partners of our Company regarding the protection and processing of personal data are reported to our Company. To that end, our Company assesses participation in the training, seminars, and briefing sessions, and performs the necessary inspections or has them performed independently. Our company updates and renews the training in parallel with updates to the applicable legislation.

### **3. SECTION 3 – PROVISIONS REGARDING PROCESSING OF PERSONAL DATA**

Our Company processes accurate and up-to-date (updated as necessary) personal data for clear, specific and legitimate purposes in line with the law and principles of good faith and in connection with, limited to and to the extent necessary for the purpose of processing in accordance with Article 20 of the Constitution and Article 4 of the PPD Law. Our Company stores personal data for the period stipulated in the applicable legislation or necessary for the purpose of processing.

Our Company processes personal data based on one or more of the conditions for processing

personal data stipulated in Article 5 of the PPD Law in accordance with Article 20 of the Constitution and Article 5 of the PPD Law.

Our Company acts in accordance with the conditions for processing sensitive personal data stipulated in Article 6 of the PPD Law.

Our Company acts in accordance with the provisions for the transfer of personal data stipulated in the PPD Law and set forth by the PPD Board as per Article 8 and 9 of the PPD Law.

#### **3.1. PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH THE PRINCIPLES STIPULATED IN THE LEGISLATION**

##### **3.1.1. Processing in Accordance with the Law and Principles of Good Faith**

Our Company acts in accordance with the principles outlined by the legal regulations with respect to personal data processing, and the general principle of confidence and good faith. In this context, our Company respects the proportionality in the processing of personal data, and does not use personal data for purposes other than the purpose of processing.

##### **3.1.2. Personal Data Must Be Accurate and Updated as Necessary**

Our Company ensures that the personal data it processes is accurate and up-to-date to protect the fundamental rights of personal data subjects and its own legitimate interests. It takes the necessary measures to that end.

##### **3.1.3. Processing for Clear, Specific and Legitimate Purposes**

Our Company defines clear and specific purposes for its legitimate and lawful personal data processing activities. Our Company processes personal data in connection with and to the extent necessary for the services it offers. Our Company defines the purposes for which personal data will be processed before starting its personal data processing activities.

#### **3.1.4. Processing in Connection with, Limited to and to the Extent Necessary for the Purpose of Processing**

Our Company processes data in a manner that is suitable for the realization of the defined purposes, and does not process personal data that is not connected with or necessary to achieve these purposes.

For example, it does not process personal data to meet potential needs that may arise in the future.

#### **3.1.5. Storing Personal Data for the Period Stipulated in the Applicable Legislation or Necessary for the Purpose of Processing**

Our Company stores personal data only for the period stipulated in the applicable legislation or necessary for the purpose of processing. In this context, our Company determines if a data retention period is stipulated in the applicable legislation; if a period is stipulated it acts in accordance with this requirement, and if not, it stores personal data for the period necessary for the purpose of processing. When such period ends or data is no longer needed for the original processing purposes, personal data are deleted, destroyed or anonymized by our Company.

### **3.2. PROCESSING OF PERSONAL DATA BASED ON ONE OR MORE OF THE CONDITIONS FOR PROCESSING OF PERSONAL DATA STIPULATED IN ARTICLE 5 OF THE PPD LAW AND LIMITED TO THESE CONDITIONS**

Protection of personal data is a Constitutional right. Fundamental rights and freedoms can only be restricted for the reasons specified in the relevant articles of the Constitution and by law without prejudice to the essence of such rights and freedoms. According to Article 20/3 of the Constitution, personal data may only be processed in circumstances designated by law or with express consent of the subject. In this context, our Company processes personal data only in circumstances designated by law or with express consent of the subject in accordance with the Constitution.

Express consent given by the personal data subject is only one of the legal grounds that render the processing of personal data legitimate. Beside express consent, personal data may also be processed in case of one of the conditions listed below. Just as one of the conditions listed below can offer a legal ground for the processing of personal data, more than one can offer a legal ground for the same personal data processing activity as well. If the data being processed is sensitive personal data, the conditions provided below apply.

Although the legal grounds for our Company's personal data processing activities may vary, all kinds of personal data processing activities are carried out in accordance with the general principles set forth in Article 4 of the PPD Law (See Section 3.1.).

#### **(i) Personal data subject gives express consent**

One of the conditions for the processing of personal data is the express consent of the data subject. Express consent about a certain matter must be given freely after being informed.

For personal data processing activities to be carried out for secondary purposes aside from the primary purposes for which personal data is acquired, at least one of the conditions set forth in clauses (ii), (iii), (iv) (v), (vi), (vii) and (viii) of this section is required; if none of these conditions apply, our Company carries out such personal data activities based on the express consent of the subject.

For personal data processing activities based on the express consent of the subject, express consent is obtained from potential customers and visitors using applicable methods.

**(ii) It is specifically designated by laws**

Personal data of the subject may be lawfully processed if it is specifically designated by law.

**(iii) Express consent cannot be obtained due to physical impossibilities**

Personal data of the subject may be processed if it is mandatory in order to protect the life or physical integrity of others or the personal data subject whose consent cannot be obtained due to physical impossibilities or whose consent would not legally be valid.

*Example: Company employees shares the blood type of the customer who has fainted with the doctors.*

**(iv) It is directly related to the execution or performance of a contract**

Personal data of the contracting parties may be processed if it is directly related to the execution or performance of a contract.

*Example: Exchange of address, name and other information of the subject who has purchased a product from Aygaz.*

**(v) It is necessary for the fulfillment of legal obligations by the Company**

Personal data of the subject may be processed if it is mandatory for our Company, the data controller, to fulfill its legal obligations.

*Example: Sharing information with the court if it is requested with a court order.*

**(vi) The personal data has been made public by the Data Subject**

Personal data may be processed if it has been made public by the data subject.

*Example: When a subject posts a complaint about an Aygaz product on a public complaint website, information shared on such a website is considered to be made public by the data subject. Aygaz may only use such information to contact the subject and address his/her complaint.*

**(vii) It is mandatory for the establishment or protection of a right**

Personal data of the data subject may be processed if it is mandatory for the establishment, exercise or protection of a right.

*Example: Retention of data (including sales contract and invoice) which serves as evidence and use of the same when necessary.*

**(viii) It is mandatory for the legitimate interests of our Company**

Personal data of the subject may be processed if it is mandatory for the legitimate interests of our Company provided that such processing will not prejudice the fundamental rights and freedoms of the data subject.

*Example: Collecting video records for security purposes.*

**3.3. PROCESSING OF SENSITIVE PERSONAL DATA**

Our Company acts in strict accordance with the conditions stipulated in the PPD Law with respect to the processing of personal data that is classified as “sensitive” according to the PPD Law.

Pursuant to Article 6 of the PPD Law, some categories of personal data are classified as “sensitive” because of the risk of causing unjust or discriminatory treatment when unlawfully processed. Such sensitive data include data that reveal race, ethnic origin, political opinion, philosophical views, religion, sect or other beliefs, appearance, membership in an association, foundation or union, health status, sex life, criminal conviction and security measures, as well as biometric and genetic data.

Our Company processes sensitive personal data in accordance with the PPD Law in the following circumstances provided that sufficient measures to be specified by the PPD Board are taken:

- There is express consent from the personal data subject or
- If the express consent of the personal data subject has not been obtained;
  - In circumstances designated by law, except for data relating to the health status and sex life of the subject;
  - If sensitive personal data relating to the health status and sex life of the data subject is to be processed, such data must be processed by authorized institutions and organizations or those who are bound by confidentiality obligations only for the purposes of protecting public health, practicing preventive medicine, providing diagnosis, treatment and care services, or planning and managing health care services and financing.

### **3.4. TRANSFER OF PERSONAL DATA**

Our Company may transfer personal data and sensitive personal data of subjects to third parties (third party companies, group companies, third persons) for lawful processing purposes taking necessary security measures. In this context, our Company acts in accordance with the provisions set forth in Article 8 of the PPD Law.

Our Company may transfer personal data and sensitive personal data of data subjects to third persons for lawful processing purposes taking necessary security measures. Our Company transfers personal data to foreign countries which are declared to have an adequate level of protection by the PPD Board ("Foreign Country with Adequate Level of Protection") or foreign countries without an adequate level of protection for which an adequate level of protection is guaranteed in writing by the data controllers in Turkey and the relevant foreign country and to which the transfer is permitted by the PPD Board ("Foreign Country in which Adequate Level of Protection is Guaranteed by the Data Controller"). In this regard, our Company acts in accordance with the provisions set forth in Article 9 of the PPD Law.

### **3.5. PERSONAL DATA PROCESSING ACTIVITIES IN THE ENTRANCES OF OR INSIDE BUILDINGS AND FACILITIES, AND WEBSITE VISITORS**

Our Company utilizes a security camera surveillance system to monitor buildings and facilities, and processes personal data to track visitor traffic to ensure security. Our Company carries out personal data processing activities by utilizing security cameras and logging visitor traffic. In this context, our Company acts in accordance with the Constitution, the PPD Law and other applicable legislation.

Our Company keeps video records of visitor activity in the entrances and inside the buildings and facilities through security camera surveillance systems. These video surveillance activities aim to improve the quality and reliability of the services offered, ensure security of the company, customers and others, and protect customers' interests related to the services they purchase.

Our Company acts in accordance with the provisions set forth in the PPD Law in carrying out security camera surveillance activities. Our Company's security camera surveillance activities comply with the Law on Private Security Services and applicable legislation.

Records created and stored in digital format are accessible only by a limited number of Company employees. Live camera footage may only be viewed by outsourced security officers. A limited number of employees who have access to records pledge in writing to respect the confidentiality of the data they access.

Our Company takes the necessary technical and administrative measures to ensure the security of personal data acquired as a result of its security camera surveillance activities in accordance with Article 12 of the PPD Law.

In addition to the aforementioned camera recording, our Company also processes personal data to track visitor traffic in its buildings and facilities to ensure security and for the purposes specified in this Policy.

Visitors to our Company's buildings are informed about personal data processing when their names and surnames are collected or via written notices posted on the walls or texts that are otherwise made available to visitors. Data collected for tracking visitor traffic is processed or recorded in a physical data recording system only for this purpose.

When requested, our Company provides Internet access to our Visitors in our Buildings and Facilities for the duration of their visits to ensure security and for the purposes specified in this Policy. Our visitors' Internet access is logged in accordance with Law 5651 and the mandatory provisions of the regulations based on this Law; such logs are kept only to fulfill our legal liabilities with respect to requests from authorized public institutions and organizations or inspections to be carried out in our Company.

Only a limited number of AYGAZ employees have access to these logs. Company employees with access to these logs access the logs only to use with respect to requests from authorized public institutions and organizations or inspections and share only with legally authorized persons. A limited number of employees who have access to records pledge in writing to respect the confidentiality of the data they access. Our Company keeps records of activities on the websites it operates via technical tools (e.g., cookies) in order to help visitors realize the purposes of their visit, display personalized content to visitors and perform online advertising activities.

"Website Privacy Policy" texts published on websites offer detailed information on protection and processing of personal data with respect to these activities conducted by our Company.

## **4. SECTION 4 – OTHER PROVISIONS**

### **4.1. RELATION OF COMPANY PERSONAL DATA PROTECTION AND PROCESSING POLICY TO OTHER POLICIES**

By producing policies, procedures and guidelines regarding the implementation of the principles set forth in this Policy, the Company ensures that these principles are respected within the Company. By establishing relations between the policies, procedures and guidelines for the protection of personal data and the Company's basic policies, procedures and guidelines in other areas, the processes operated by the Company for similar purposes yet on different policy principles are harmonized.

### **4.2. COMPANY PERSONAL DATA PROTECTION AND PROCESSING POLICY GOVERNANCE STRUCTURE**

A "Personal Data Protection Committee" has been formed within our Company with decision form the senior management of the Company to regulate this Policy and other policies, procedures and guidelines related to this Policy. The duties of this committee are as follows:

- To draw up basic policies on the Protection and Processing of Personal Data and changes, as necessary, and to submit these to senior management for approval to put them into effect.
- To establish how the policies on the Protection and Processing of Personal Data will be implemented and how the inspections will be performed, and to obtain approval from senior management for personnel appointments within the Company and measures to ensure coordination in this context.
- To determine the actions that must be taken to ensure compliance with the Law on Protection of Personal Data and the relevant legislation, obtain approval from senior management for such actions, and ensure implementation and coordination of these actions.
- To raise awareness within the Company and with business partners of the Company about the Protection and Processing of Personal Data.
- To identify the potential risks related to the Company's personal data processing activities and ensure that the necessary measures are taken, and to submit improvement proposals to senior management for approval.
- To design and execute training about the protection of personal data and implementation of policies.

- To make decisions about the applications of personal data subjects at the highest level.
- To coordinate the execution of information and training activities for personal data subjects in connection with personal data processing activities and subjects' legal rights.
- To stay abreast of the developments and regulations related to Protection of Personal Data; and to advise senior management of actions to be taken within the Company in line with these developments and regulations.
- To coordinate relationships with the PPD Board and Agency.
- To perform other duties to be assigned by senior management with respect to the protection of personal data.

### **ATTACHMENT 1 - DEFINITIONS**

|  |   |
|--|---|
| <b>Express Consent</b>   | Consent regarding a certain matter given freely after informed  |
| <b>Anonymization</b>   | Anonymization is the process of irreversibly changing personal data so that it is no longer personal data. Example: Using techniques such as data masking, aggregation and distortion to prevent the identification of the individual to whom it relates  |
| <b>Employee Candidate</b>                                      | Real persons who have applied for any type of job at our Company or otherwise made their curricula vitae and relevant information available to our Company for review   |
| <b>Processing Personal Data of Employees, Shareholders and</b> | Real persons such as employees, shareholders and officials in organizations with whom our company has any type of business relation (including but not limited to business partners, dealers, suppliers, etc.)  |
| <b>Officials of Organizations We Collaborate With</b>          | Any operation performed on personal data such as collection, recording, storing, safeguarding, modification, revision, disclosure, transfer, takeover, putting it into an acquirable format, classification or preventing its use, etc. in a completely or partially automated means or by non-automated means if such processing is part of a data recording system. |
| <b>Personal Data Subject</b>                                   | Real person whose personal data is processed. For example, customers and employees  |

|                                |   |
|--------------------------------|---|
| <b>Personal Data</b>           | Any piece of information relating to real persons that is specific or identifiable. For example name and surname, Turkish ID number, e-mail, address, date of birth, credit card number, bank account number, etc. Therefore, processing data about legal persons is not covered by the PPD Law.          |
| <b>Customer</b>                | Real persons who use or have used the products and services offered by our Company regardless of whether they have a contractual relationship with our Company.   |
| <b>Sensitive Personal Data</b> | Data that reveal personal information such as race, ethnicity, political opinion, philosophical views, religion, sect or other beliefs, appearance, membership in an association, foundation or union, health status, sex life, criminal conviction and security measures, and biometric and genetic data |
| <b>Potential Customer</b>      | Real persons who have requested or shown interest in using our products and services or who are considered to have such interest based on evaluations made in line with the customs of trade and principles of good faith   |
| <b>Company Shareholder</b>     | Real persons who hold shares in our Company   |
| <b>Company Officer</b>         | Members of the board of directors of our company and other authorized real persons  |
| <b>Third Party</b>             | Third party real persons who have relations with the aforementioned parties for the purpose of ensuring the security of commercial transactions with our Company or protecting the rights and interests of the relevant parties (e.g. Guarantor, Companion, Family Members and relatives)                 |
| <b>Data Processor</b>          | Real or legal persons who process personal data on behalf of the data controller with authorization from the same. For example, cloud computing companies who maintain the records of our Company's data, pollsters who have customers sign forms, call-centers instructed to make calls, etc.            |

|                        |   |
|------------------------|---|
| <b>Data Controller</b> | A person who specifies the purposes for which and the means by which personal data are processed and the environment where such data is systematically stored (data recording system) |
| <b>Visitor</b>         | Real persons who for various reasons enter the physical premises owned by our company or visit our websites   |



## ATTACHMENT 2 – ABBREVIATIONS

|                      |  |
|----------------------|--|
| <b>PPD Law</b>       | Law 6698 regarding the Protection of Personal Data dated March 24, 2016 published in Official Journal 29677 on April 7, 2016           |
| <b>Constitution</b>  | The Constitution of the Republic of Turkey number 2709 dated November 7, 1982 published in Official Journal 17863 on November 9, 1982. |
| <b>PPD Board</b>     | Personal Data Protection Board   |
| <b>PPD Agency</b>    | Personal Data Protection Agency  |
| <b>Policy</b>        | Aygaz Personal Data Protection and Processing Policy   |
| <b>Company/AYGAZ</b> | Aygaz A. Ş.  |

**ATTACHMENT 3 IMPORTANT DATES WITH RESPECT TO THE IMPLEMENTATION OF THE PPD LAW**

|                               |   |
|-------------------------------|---|
| <p><b>April 7, 2016</b></p>   | <p>As of April 7, 2016, our Company acts in accordance with the liabilities listed below:</p> <ul style="list-style-type: none"> <li>(i) General rules and principles regarding the processing of personal data</li> <li>(ii) Liabilities regarding informing personal data subjects</li> <li>(iii) Liabilities related to ensuring data security</li> </ul>  |
| <p><b>October 7, 2016</b></p> | <p>The regulations listed below took effect on October 7, 2016, and our Company acts in accordance with these regulations:</p> <ul style="list-style-type: none"> <li>(i) Provisions regarding the transfer of personal data to third parties and abroad</li> <li>(ii) Regulations regarding personal data subjects' requests to exercise their rights (ask for confirmation about whether his/her personal data is being processed, request information, request the list of persons to whom personal data is transferred, request corrections) and to report complaints to the PPD Board</li> </ul> |
| <p><b>April 7, 2017</b></p>   | <p>As of April 7, 2016,</p> <ul style="list-style-type: none"> <li>(i) Consent obtained in accordance with the law before April 7, 2016 will be considered in compliance with the PPD Law unless the personal data subject makes a declaration to the contrary.</li> <li>(ii) Regulations related to the PPD Law will take effect, and our Company will act in accordance with these regulations.</li> </ul>  |
| <p><b>April 7, 2018</b></p>   | <p>Personal data processed before April 7, 2016 is harmonized with the PPD Law by our Company as of April 7, 2018 or is deleted or anonymized.</p>  |

**ATTACHMENT 4 - PROCESSING OF PERSONAL DATA BELONGING TO EMPLOYEE CANDIDATES AND EMPLOYEES OF BUSINESS PARTNERS**

| PERSONAL DATA SUBJECT             | COLLECTION AND PROCESSING OF PERSONAL DATA   | EXERCISE OF RIGHTS AND APPLICATIONS   |
|-----------------------------------|--|---|
| <p><b>Employee Candidates</b></p> | <p>Personal data of employees collected during the hiring process and sensitive personal data collected in connection with the nature of the job position is processed by our Company for execution of activities outlined in the human resources policy of our Company, hiring, purposes specified in this Policy and other purposes listed below:</p> <ul style="list-style-type: none"> <li>• Evaluation of the qualifications, experience and relevance of the candidate for the open position,</li> <li>• Verification of the data provided by the candidate or doing research about the candidate by contacting third parties when necessary,</li> <li>• Contacting the candidate about the application and hiring process or subsequently contacting the candidate for any open position at home or abroad if appropriate,</li> <li>• Satisfying the requirements of applicable legislation or the requests of authorized institutions or organizations,</li> <li>• Improving and enhancing the hiring principles used by our Company.</li> </ul> <p>The personal data of employee candidates may be collected using the following methods and means:</p> <ul style="list-style-type: none"> <li>• Printed or digital application form in electronic environment;</li> <li>• Curricula vitae sent to our Company through e-mail, shipment, reference and other similar</li> </ul> | <p>Employee candidates may submit their requests to exercise their rights as the data subject to our Company as described in Section 2.2. of this Policy.</p> |

|                                       |  |   |
|---------------------------------------|--|---|
|                                       | <ul style="list-style-type: none"> <li>• Using means such as video conference, telephone, or face-to-face interview,</li> <li>• Checks to verify data provided by the candidate and research done by our Company,</li> <li>• Hiring tests to assess skills and personality traits conducted and analyzed by experienced experts.</li> </ul>  |   |
| <b>Employees of Business Partners</b> | <p>Our Company may process the personal data of the employees of its business partners for the purposes specified in this Policy and the purpose of ensuring the execution of our Company's human resources policy and the commercial and legal security of our Company and the persons we collaborate with in the context of carrying out the commercial activities our Company has established with its business partners.</p> | <p>Employee candidates may submit their requests to exercise their rights as the data subject to our Company as described in Section 2.2. of this Policy.</p> |