

## **GÜLERMAK - GENERAL POLICY ON PROCESSING AND PROTECTION OF PERSONAL DATA**

### **1. INTRODUCTION**

Gülermak Ağır Sanayi İnşaat ve Taahhüt Anonim Şirketi (“**Gülermak**”); attaches importance on processing personal data owned by Gülermak’s shareholders, members of board of directors, personnel, employees of Gülermak’s subcontractors, representatives of the firms cooperated and visitors of Gülermak facilities primarily in compliance with The Law on Protection of Personal Data (“**KVK Law**”) numbered 6698 and relevant legislation (“KVK Legislation”) and to ensure persons (“Relevant Person”) having their personal data processed to utilize their statutory rights in an effective manner.

Gülermak realizes of all its procures in relation with processing all personal data acquired in during the course of its activities and connection thereof, their acquisition, recording, storing, maintaining, modifying, rearranging, defining, transferring, taking over, cause to make them attainable, classifying or preventing their use per Gülermak-General Policy on Processing and Protection of Personal Data (“**Policy**”).

Gülermak processes personal data to the extent that it is limited to the extent necessary for the continuity of its activities; causes-objectives of processing these data do not exceed the limits set out under Articles 5 and 6 of KVK Law outlining conditions of processing personal data and special quality personal data.

### **2. PROCEDURE APPLIED BY GÜLERMAK TO PROCESS-PROTECT PERSONAL DATA**

#### **i. General Policy**

Gülermak, in line with its general policy regarding the processing and protection of personal data;

- Requests only the necessary information from the relevant persons for a legal obligation, processing condition and / or a specific purpose in accordance with the KVK legislation.
- Enlighten Relevant Persons it has obtained their personal data for the issues of which data and for what purpose they are requested, in what manner, for what purposes and until when these data shall be stored and recorded and to whom and for what purposes do these data can be transferred and about the rights of the Relevant Person.
- Where explicit consent is required for the processing of a personal data, requests the explicit consent of the Relevant Person, it does not in any way enforce consent by making it a prerequisite for the realization of a procedure / service.
- Processes and protects all personal data obtained in accordance with the KVK Legislation; takes administrative and technical actions designated by Personal Data Protection Agency for the confidentiality of these data.

- Primarily raises its employees' awareness in relation to the personal data it processes; restricts employees' access to personal data to the extent required by their duties and adds commitments for the protection of personal data to labor contracts. Besides, also signs agreements with third parties and institutions to ensure the confidentiality and processing of the personal data transmitted. Gülermak assigned interoffice discipline sanctions for the sake of managing this process for its employees.
- It stores the personal data obtained only for the periods specified in the law or during the period in which this data should be stored / recorded in any way; deletes, destroys or make anonymous all personal data no more required in compliance with KVK legislation. Gülermak for the sake of managing this process designated control and disposal processes and created a Personal Data Storage and Disposal Policy.
- Also established the necessary procedure for the persons concerned to exercise their legal rights regarding their personal data being processed.

## ii. **Basic Principles**

Gülermak precisely approaches the issue of all personal data it processes to;

- a. Be in compliance with law and rules of ethic,
- b. To be true and updated when necessary,
- c. To be processed for specific, explicit and legal purposes,
- d. To be interrelated, limited and temperate with the purpose they are processed,
- e. To be stored until a period required as foreseen in the relevant legislation and for the purpose they are processed

And takes necessary administrative and technical actions to process personal data in compliance with these procedures.

## iii. **Actions Taken to Protect Personal Data**

### a. **Administrative Actions:**

Establishing current risks and threats→Gülermak by considering whether personal data is a personal data of a specific nature, the degree of confidentiality required by nature, the nature and quantity of damage that may arise in respect of the Person concerned in the event of a security breach and paid attention not to acquire any unnecessary data and in case if it is necessary to process special quality personal data, explicit consents of people sought, confidential documents are only stored in places to be accessed by authorized persons and personal data after their purpose of process removed are erased, terminated or made anonymous.

Employees training and awareness rising studies→Gülermak has informed its employees about issues such as not disclosing and sharing personal data as contrary to law, employee awareness has been created, required actions were taken by establishing security risks, roles and obligations, job definitions of the employees for personal data security were established, contracts concluded with employees for the confidentiality of the personal data, required articles added to labor contract and worker regulation and a disciplinary process to be involved in case of employees failing to obey security policies and procedures.

Establishing personal data security policies and procedures→Gülermak has determined which personal data was found in the data recording systems and created an inventory with these data, the current security measures were investigated and compliance with legal obligations were ensured, policies and procedures were prepared, required actions were taken by designating problematic areas, regular control periods were established and certified and controls initiated accordingly and it was decided to set out and making required updates for the issued needed to be developed in the controls and it was also established how to manage security breaches and risks those may rise about every personal data category.

Reducing personal data as much as possible→Personal data are processed by Gülermak in an accurate and up-to-date manner and maintained for the period required by the relevant legislation or for the purpose for which it was processed, it is assessed whether personal data processed during periodical controls still needed, unwanted personal data are deleted, terminated or made anonymous in line with personal data storage and disposal policy, data requiring no frequent access and those kept for achieving purposes are kept in more secure media to prevent unauthorized access.

Managing relations with data processors→For the sake of ensuring persons/agencies to whom data transferred for the reason of outsourcing provided security levels at least they ensure for their own data, Gülermak signs personal data transfer contracts with data processors; and via the said contract it is guaranteed the referred persons/agencies act in compliance with data processing purpose and scope and with personal data protection legislation, obeying personal data storage and disposal policy, data processor to be subject to confidentiality obligation, in case of any data violation in the said contract data processor to be obliged to immediately inform this situation to Gülermak.

## **b. Technical Actions**

Establishing cyber security→Firewall, gateway patch management and software updates are used by Gülermak, it is regularly checked whether security actions taken for the systems are sufficient, it is periodically ensured to change passwords and codes, manager accounts and admin authority are only allowed when there is a need, access to relevant systems ensured by using user name and password, for employees dismissed from Gülermak, the account is deleted or entries are closed immediately, products such as anti-virus and anti-spam are used and updated, connections realized with secure methods while personal data from different web sites are supplied. In addition, powerful and unpredictable passwords and passwords have been created by Gülermak and the number of password entry attempts has been limited, access to systems containing personal data were restricted, access to systems containing personal data is restricted, and employees are granted access to the extent necessary for their work and tasks and their powers and obligations, unused software and services removed from devices, access authority and control matrix and a separate access policy and procedure was created.

Monitoring personal data security→Gülermak regularly checks security software messages, access control records and other reporting tools, and actions taken against alerts from these systems, in order to protect information systems against known vulnerabilities, vulnerability scans and infiltration tests are conducted regularly, assessments made in accordance with the test result for emerging security gaps, evidences collected for unwanted incidents such as information system crash, malicious software, discarding attacks, incomplete or incorrect data

entry, violations of privacy and integrity, abuse of information system and stored in a secure manner.

Ensuring security of environments containing personal data→Actions taken by Gülermak for paper media, electronic media and devices owned by Gülermak, Personal data transmitted by e-mail or mail is sent with precautionary measures and documents such as paper documents, servers, backup devices, CDs, DVDs and USB devices containing personal data are kept in a lock when not taken to another room where additional security measures are used, entry-exit records to the environment are kept, unauthorized access to said documents prevented, access control authorization and encoding methods used against situations such as loss or stealing of devices containing personal data; in this context, the password key is stored in an environment accessible only to authorized persons and unauthorized access is prevented, files encoded with full disc encryption, internationally recognized encoding programs are used. In addition to those, Gülermak has taken security measures to ensure that there is no breach of security when employees' personal electronic devices access the information system network, for personal data stored electronically, access between network components is restricted and the components are separated.

Supply, development and maintaining information technologies systems→Gülermak checks that the inputs of the application systems are correct and appropriate, data storage media in the devices removed and stored for ensuring security of personal data before dispatching for maintenance and repair works of devices sent to third institutions such as producer, dealer and service due to their malfunctions and expiry of service periods and only defected parts are dispatched and when a personnel out of company arrives for maintenance and repair purposes personal data are copied and required actions taken to prevent devices to lead out. In addition, control mechanisms are installed in the applications in order to check whether the information entered correctly into the system by Gülermak is corrupted.

Backup of personal data→Backed-up personal data can only be accessed by the system administrator, data set backups are excluded from the network and all backups are provided with physical security. Moreover, data backup strategies have been developed by Gülermak to provide personal data security against malware.

#### **iv. Right to Application of Relevant Persons**

Gülermak informs the Related Persons whom it has processed her personal data within the scope of the disclosure obligation about their rights under Article 11 of the KVK Law. Relevant persons may at all time apply to Gülermak and have right to:

- To learn whether personal data is processed or not,
- Request information if personal data is processed,
- To learn the purpose of processing personal data and whether they are used as fit for their purposes,
- To know about the third parties to whom personal data is transferred at home and abroad,
- To ask for correcting personal data if they're incompletely or false processed,
- Requesting that personal data be deleted, destroyed or made anonymous, provided that the reasons for the processing of personal data have been removed,
- Requesting these procedures to be informed to third persons to whom personal data are transferred in cases of deleting, terminating or making anonymous the personal data due

to the reason of removing the causes requiring their processing for the personal data correction procedure for incomplete or faulty processing,

- Object to the occurrence of a result against them by analyzing their personal data exclusively through automated systems,
- In case of exposing to losses due to the fact that personal data are illegally processed, to request

to compensate the loss. Data officials may personally submit their petition containing such requests to Gülermak resident in Bahçelievler Mahallesi, Ankara Konya Yolu 23. Km No:111 06830 Gölbaşı/Ankara address against identity card or by sending to same address via public notary.

These requests will be finalized as soon as possible according to their nature and in any event within 30 (thirty) days free of charge or in case of the conditions in the tariff to be published by the Personal Data Protection Board regarding the fee.

Gülermak reserves the right to request additional information and document both during application or when assessing the said application.

Gülermak accepts the request or rejects it by explaining the reason and informs the person concerned in writing or electronically. In case if the request as specified in the application is accepted, necessary actions shall be taken by Gülermak. If the application arises from Gülermak's fault, the fee charged to the applicant shall be returned to the person concerned.