

**KORDSA TEKNİK TEKSTİL A.Ş.
PERSONAL DATA PROCESSING AND PROTECTION POLICY**

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1. PURPOSE AND SCOPE

From past to present, Kordsa Teknik Tekstil Anonim Şirketi (“Kordsa”) adopted to show utmost importance to the order of law. Accordingly, all kinds of operations are being carried out in order to conform with Protection of Personal Data Law numbered 6698 and the related legal regulations which are intended for process and protection of personal data.

Kordsa Personal Data Processing and Protection Policy (“PVP Policy”) aims to determine the basic principles to be applied for carefully processing and protecting personal data in all departments, operations and processes as remaining limited with legitimate purposes in accordance with the law. Sustainability of data safety principle in our company is aimed by adopting PVP Policy.

In this policy, information on data processing and basic principles are expressed to conform the operations run by Kordsa to the current regulations in the law. .

PVP Policy is applied for personal data of natural persons such as Kordsa employee candidates, old employees, consultants, shareholders, employees of business associates and visitors and which is not processed by Kordsa automatically by being a part of a Data Registry request completely or partially. Personal Data of Kordsa employees is treated under Employee Personal Data Processing and Protection Policy.

Kordsa sets up the necessary system to create awareness about protection of personal data and procures the necessary order to provide internal transactions to conform with regulations of personal data protection and process.

PVP policy is published on website of Kordsa (<http://www.kordsa.com>) and it is open for access of personal data owners. In parallel with the changes and innovations in the related regulation, amendments to be occurred Kordsa PVP Policy will be open to access of personal data owners in a way they can access easily. In case there is a contradiction between the law and Kordsa PVP Policy, the provisions of the law in force will be deemed binding.

2. DEFINITIONS

“Explicit Consent” Written consent which is declared with a free will and related to a

certain subject and referring to a briefing.

“Disposal” Deletion, disposal of personal data or anonymizing personal data.

“Sabancı Holding” Hacı Ömer Sabancı Holding A.Ş.,

“Personal Data” All kinds of information on identified person or identifiable natural person (Expression of "Personal Data" in this PVP Policy also comprise

“Personal Data of Special Nature” in the degree where it is applicable.

“Data Owner/Related Person” Natural person whose personal data is being processed.

“Personal Data Processing” All kinds of transaction carried out over data such as collection, record, storage, amendment, rearrangement, disclosing, transfer, taking over, being acquirable, classifying or detention of use of personal data non-automatically by being a part of an automatic data registry system completely or partially.

“Kordsa Business Partners” As carrying out the commercial operations, persons who sells goods or services to Kordsa and without being limited with these, associating partnership with various purposes.

“Kordsa PVP Committee” Committee which is formed by participation of Global Legal Function, Global Human Resources and Global Information Technologies Functions with the purpose of providing conformity with the Personal Data Protection Law and sustainability and protection of conformity.

“Application Form of Data Owner” The application form which can be used by Personal Data Owner while making applications related to rights stated in article 11 of the Personal Data Protection Law.

“Data Processor” Natural or legal person who processes the personal data in the name of Data Controller upon the authority given by Data Supervisor,

“Data Controller” Kordsa Teknik Tekstil Anonim Şirketi who is responsible with the foundation and management of data registration system which determines the purposes and tools of personal data process,

“Personal Data of Special Nature” Data related to race, origin, political view, philosophical thought, religion, sect or other beliefs, dress, society, foundation or union membership, health, sexual life, conviction and safety precautions, and biometric and genetic data.

3. ROLES AND RESPONSIBILITIES

CEO is responsible with the application of this PVP Policy and other related policy and/or procedures and Kordsa PVP Committee will be the primary advisory source and guide in matters such as planning necessary training with the purpose of providing conformity, ensuring communication between functions and resolving demands that might come from Data Owners.

Kordsa all function and employees, employee candidates, former employees, consultants, shareholders, employees of business associates, visitors and other natural persons are responsible with application, generalizing and sustainability of the determined principles of PVP Policy. Within this purpose, all our

employees, employee candidates, former employees, consultants, shareholders, employees of business associates, visitors and other natural persons are responsible with collaborating with PVP committee and reporting any violation to Kordsa PVP Committee without any delay.

4. PRINCIPLES ON PERSONAL DATA PROCESSING

Kordsa always follow the principles in the following and ensures that employees also follow these principles:

4.1 Conforming rules of law and righteousness

Kordsa personal data always adopt processing data in accordance with rules of law and principles of righteousness as primary purpose.

4.2 Providing right and updated data

Kordsa tries to provide that collected personal data is right and updated as much as the technical possibility and takes necessary precautions to correct faulty data or to confirm the accuracy of the data when necessary.

4.3 Processing personal data for specific, explicit and legitimate purposes

Kordsa clearly and precisely determines the purposes of processing personal data and ensures that they are legitimate. In this context, Kordsa takes care to ensure that personal data processing activities are clearly understandable by the Data Owners.

4.4 Processing personal data in accordance with purpose, in a limited and measured way

Kordsa processes personal data for clear, public and certain purposes and in a limited and measured way in relation with these purposes. Personal data is not processed with the thought of it will also be required in the future periods. Kordsa shows regard to basic rights and benefits of the data owners.

4.5 Storing the personal data for the required duration for the process purpose or the duration stated in the related regulation

Kordsa preserves the personal data for the duration stated in the related regulation or for the required reasonable duration for the process purpose and conforms to time limitations. Kordsa disposes the personal data following the expiration of the duration stated in the regulation and the reasons to process of personal data disappear.

5. CONDITIONS FOR PERSONAL DATA PROCESSING

Personal data is processed in accordance with the principles and basis stated in the following.

5.1 Conditions FOR Personal Data Processing

Kordsa processes personal data in accordance with Article 5 of the Protection of Personal Data Law numbered 6698, in the event of one of the following conditions are met, it is possible to process Personal Data without without seeking the Explicit Consent of Data Owner;

- It is expressly provided for by the laws. It is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid. On condition that it is related directly with performance or establishment of an agreement, when it is required to process the Personal Data of parties of the agreement.
- When it is mandatory to process personal data to fulfill the legal obligation of Kordsa as Data Controller.
- When the personal data is made public by the related person himself/herself.
- When it is mandatory to process data to establish, exercise or protect a right.
- When it is mandatory to process data for the legitimate interests of Kordsa as data Controller on condition that fundamental right and freedoms of the related person is not violated.

In cases where at least one of the above-mentioned data processing conditions is not available, Personal Data is processed by Kordsa by obtaining the Explicit Consent of the Data Owner. The Data Owner can always withdraw the Explicit Consent they have provided to Kordsa.

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