

**POLICY OF PROTECTION AND
PROCESSING OF PERSONAL DATA**

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1. INTRODUCTION

Law of Protection of Personal Data ("Law or the PPD Law") numbered 6698 brings important regulations regarding the processing of personal data, the protection of these data and the deletion / destruction of expired personal data in accordance with the law.

As per 3 / d article of this law, personal data is identified as any kind of information relating to an identifiable or identified natural person. Personal data processing definition has been made in all kinds of transactions from recording / collecting to deleting / disposing all information of the person whose personal data is processed.

First of all, the protection of personal data, which is a constitutional right has a major importance for Erta Elektromekanik Imalat Sanayi ve Ticaret A.S. ("ERTA" or "Company") and it is our priority to protect these rights. In this scope, this Personal Data Protection Processing Policy ("PPD Policy" or " Policy ") has been established. Through full awareness of our responsibility in this context, your personal data is processed and protected under this Policy.

2. PURPOSE

ERTA, which has adopted every principle to comply with the rules of law ever since its establishment, installs and develops the systems related with the performance of all kinds of activities required for conformance to legislation for processing and protection of personal data in accordance with Protection of Personal Data Law No. 6698, the regulations and guides issued in accordance with this law and the regulations.

In this context, the main purpose of our Company's PPD Policy is to provide information about the systems which are adopted for protecting personal data processing activities carried out in accordance with the law by ERTA, to provide transparency by informing our employees, customers, employee candidates, visitors, our customers with personal data, shareholders and employees and third parties. Again, with the implementation of regulations, this PPD Policy makes the data safety principles adopted by ERTA continuous and sustainable and regulates the rules laid down by the relevant legislation by implementing in scope of Company practices.

3. SCOPE

The PPD Policy covers and applies to all activities for the personal data which are processed with non-automated means with the condition to be a part of fully or partially automated or that are a part of any data recording system.

4. ENFORCEMENT AND UPDATABILITY

This policy issued by ERTA is dated 02.03.2020. In case of changes in the relevant Law or regulations or in case of renewal of the entire Policy or related articles, the effective date of the policy will be updated. The policy is published on the Company's website (<http://erta.com.tr/>) and made available to interested persons upon request of personal data holders.

5. DEFINITIONS

The important definitions used in ERTA PPD Policy are as follows;

Open Consent: Consent which is related with a specific topic, based on information and explained with free will consent.

Making Anonymous: It is the alteration of personal data in such a way that it loses the quality of personal data and this situation cannot be recovered (making personal data unrelated to a real person with the techniques such as masking, aggregation, data corruption, etc.).

Application Form: Application for containing an application for personal data owners to use their rights and the applications to be made by Person (Personal Data Holder) to Data Responsible pursuant to Protection of Personal Data Law No. 6698 "

Employee Candidate: Real persons who have applied to the ERTA for work or those who have given their resume and relevant information.

Employees, Shareholders / Authorities of Collaborating Institutions: Real persons, including the shareholders and authorities of the companies and the employees working in institutions in which ERTA has any business relationship (such as, but not limited to, business partners, suppliers).

Business Partner: The parties that ERTA establishes a business partnership with for the purpose of carrying out various projects and receiving services in person or together with the Group Companies while carrying out commercial activities.

Processing of Personal Data: All kinds of activities performed on data such as obtaining with non-automatic means, recoding, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing usage with the condition to be a part of fully or partially automated or that are a part of any data recording system.

Law Of PPD: Protection of Personal data numbered 6698 and dated 24 March 2016 published in Official Gazette dated 7 April 2016, and numbered 29677.

PPD Board: Personal Data Protection Board.

Personal Data Owner: Real person (customer, personnel, dealer employee, etc.) whose personal data is processed.

Personal Data: Any information relating to an identifiable or identified real person. Therefore, processing of information about legal entities is not within the scope of the Law (name-surname, T.R Identity number, e-mail, address, date of birth, credit card number, etc.).

Special Personal Data: Data on race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, disguise, association, foundation or union membership, health, sex, criminal conviction and security measures, and biometric and genetic data.

Supplier: Parties providing contractual service to ERTA in accordance with the orders and instructions of ERTA while conducting the ERTA's commercial activities.

Third Person: Real persons (family members, former employees, etc.) whose personal data are not identified under the policy and whose personal data is processed in scope of the policy.

Data Processor: The real and legal person who processes personal data on behalf of the

person responsible for the data by depending on the authorization given by data responsible (cloud computing company holding the data of the ERTA, call-center company etc.).

Data Responsible: The person who determines the purposes and means of the processing of personal data and who manages the place where the data is kept systematically (data recording system). ERTA is the data responsible under this policy.

Personal Data Inventory: Inventory which is detailed by the data responsible by explaining the personal data processing activities performed by the data officers depending on the business processes; maximum time required for process of personal data in scope of the purposes and for establishing personal data processing purposes, the data category by associating the group of recipients and the group of data subject and by explaining the measures taken for data safety and personal data envisaged to be transferred to foreign countries.

Deleting Data: : It means that all relevant users within the company are encrypted to prevent access to personal data and that only the data protection officer has this password.

Destruction of Data: It means the situation in which the personal data is irrevocably disposed with physical and technological methods.

Visitor: Real persons who have entered the physical sites of the ERTA for various purposes or who have visited our websites.

6. BASIC PRINCIPLES REGARDING THE PROCESSING OF PERSONAL DATA

The following principles have been adopted by the ERTA in order to comply with and maintain compliance with personal data protection legislation:

6.1. Processing in compliance with Law and Integrity Rules

ERTA carries out personal data processing activities in accordance with the legislation on the protection of personal data and the law and honesty. In this context, personal data are processed in proportion and limited to the purpose for which they are processed.

6.2. Ensuring the Accuracy and Updatability of Personal Data

ERTA carries out periodical checks to ensure the accuracy and updatability of the personal data they process, takes the necessary administrative and technical measures required within this frame and carries out the necessary processes. In this context, the Company establishes mechanisms for correcting and verifying the accuracy of the personal data of the personal data owners in case the personal data is wrong.

6.3. Processing Personal Data in a Purpose-related, Limited and Measured Format

ERTA processes personal data in connection with the data processing conditions and processes as much as necessary for the realization of these services. Our Company collects personal data only to the extent and quality required by business activities and processes it only for the specified purposes. In this context, ERTA take into account the fundamental rights of the data owners and their legitimate interests.

6.4. Processing for Specific, Clear and Legitimate Purposes

ERTA clearly sets out the purposes for which personal data is processed and is also processed for purposes related to those activities.

6.5. Preserving as long as the time required by the legislation or required for the processing purpose

ERTA maintains personal data for a limited period of time as required by the applicable legislation or for the purpose of data processing. In this context, our Company first determines whether a period is stipulated in the related legislation for the storage of personal data, and if a period is determined, acts in accordance with this period. Accordingly, ERTA complies with the time limit arising from Articles 138 of the Turkish Penal Code and Articles 4 and 7 of the PPD Law. Personal data is destroyed at the end of the designated storage periods in accordance with the periodic destruction periods or data owner application and by the specified methods of destruction (deletion and/or destruction and/or making anonymous).

7. CONDITIONS OF PROCESSING PERSONAL DATA

ERTA acts in accordance with the data processing conditions determined in Constitution,, Turkish Penal Code and 5th and 6th articles of PPD and Regulation on the Processing of Personal Health Data while carrying out the processing activity of personal data owners with the condition to obey the basic principles.

Accordingly, with the exception of the express consent of the personal data owner, the basis of the personal data processing activity may be only one of the following conditions, or more than one condition may be the basis of the same personal data processing activity. In the event that the processed data is of a special personal data the provisions of Article 11 ("Processing of Personal Data ") of this Policy shall apply.

On the other hand, ERTA determines whether such data processing conditions exist in respect of the personal data processing activities carried out and does not perform personal data processing in the lack of these conditions.

7.1. Existence of the Open Consent of the Personal Data Holder

One of the conditions for processing personal data is to take the open consent of the data owner. Open consent is taken with free will and in the way not to cause any hesitations and limited only with this transactions and on a specific subject, on the basis of notification and the personal data processing activity is carried out by the ERTA by providing the necessary information to the personal data owner. However, in the following cases, personal data processing conditions may be processed without the open consent of the data owner in the event of the existence of personal data processing conditions.

7.2. Clear Prediction of Personal Data Subject to Processing in Laws

If the personal data of the data owner is explicitly stipulated in the law, in other words, if there is a clear provision regarding the processing of personal data in the relevant law, it also conducts personal data activities limited to the relevant legal regulation.

7.3. Failure to Obtain the Open Consent of the Personal Data Owner Due to Actual Impossibility

In case it is an obligation to process the personal data to protect the life or body integrity of the person or another person in cases the person is not in the condition to express

his/her consent due to actual impossibility or consent is not validated, personal data of the data owner may be processed. In this context, ERTA continues its personal data processing.

7.4. Establishment of Personal Data Activity Agreement or Being Related with Performance

The data processing activities are carried out by ERTA if it is necessary to process the personal data of the contractual parties provided that the data owner is party to a contract or directly related to the performance of the contract.

7.5. Obligation of Personal Data Processing to Fulfill Legal Obligation

In case ERTA is required to process data in order to fulfill its legal obligations, the personal data of the data owner may be processed.

7.6. Publicizing the Data Owner's Personal Data

In case the person concerned publicizes his personal data (disclosed to the public), the personal data is processed in accordance with the purpose of publicizing it.

7.7. Obligation of Data Processing to Establish or Protect a Right

If it is necessary to process data for the establishment, use or protection of a right, the personal data of the data owner may be limited to this obligation.

7.8. Obligation of Personal Data Processing for ERTA's Legitimate Benefit

If it is compulsory for the legitimate interests of the ERTA to process data without prejudice to the fundamental rights and freedoms, which are the constitutional rights of the personal data owner, the personal data of the data owner may be processed.

8. PRINCIPLES FOR PROTECTION OF PERSONAL DATA

ERTA takes all necessary technical and administrative measures to ensure the proper level of security in order to prevent unlawful processing, access to and protection of personal data.

8.1. Ensuring the Security of Personal Data

In accordance with Article 12 of the Law, ERTA takes the necessary measures in accordance with the nature of the data to be protected in order to prevent unlawful disclosure, access, transfer or otherwise security of personal data. In this context, our Company takes administrative measures, performs or makes inspections to ensure the required level of security in accordance with the guidelines published by the Personal Data Protection Board.

8.2. Protection of Special Personal Data

Particular importance has been attached to Article 6 of the Law due to the risk of personal injury, discrimination or discrimination when processed unlawfully. This "specially qualified" personal data are race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, disguise and dress, association, foundation or union membership, health, sexual life, criminal convictions and security measures and biometric and genetic data.

In this context, ERTA implements technical and administrative measures taken for the protection of personal data in terms of special personal data and necessary audits are provided within our Company. Detailed information on the processing of special personal data is provided in Article 11 of this Policy.

9. MEASURES FOR THE PROTECTION OF PERSONAL DATA

9.1. Measures taken to ensure the legal processing of personal data

ERTA, takes technical and administrative measures in order to prevent unlawful disclosure, transfer of personal data, unlawful access to personal data or other security deficiencies that may occur in other ways.

9.1.1. Technical Measures

The main technical measures taken by the ERTA to ensure the legal processing of personal data are as follows;

- The personal data processing activities carried out within the ERTA are controlled by the established technical systems.
- The technical measures taken are reported to the related person periodically as required by the internal audit mechanism.
- Departments have been established on technical issues and expert personnel are employed.

9.1.2. Administrative Measures

Administrative measures taken by ERTA for the legal processing of personal data;

- ERTA workers are informed and trained about the personal data protection law and processing of personal data in accordance with the law.
- All personal data processing activities of the ERTA are carried out in accordance with the personal data inventory and its annexes which are formed by analyzing all business units in detail.
- Personal data processing activities carried out by the relevant departments within the ERTA, the obligations to be fulfilled in order to ensure that these activities comply with the personal data processing requirements sought by Law Of PPD are subject to written policies and procedures by ERTA, and each business unit has been informed and issues to be taken into consideration during the activity are determined.
- The information security board organizes the supervision and management of the departments within the ERTA regarding the personal data security. Awareness is created in order to meet the legal requirements determined on the basis of business units, administrative measures are implemented to ensure the supervision of these issues and to ensure the continuity of implementation through internal policies, procedures and trainings.
- The service contracts and related documents between employees, customers, suppliers include notifications related with personal data and documents containing data security, and additional protocols are made. Efforts have been made to create the necessary awareness for employees on this subject.

9.2. Technical and Administrative Measures to Prevent Illegal Access to Personal Data

9.2.1. Technical Measures

The main technical measures taken by ERTA to prevent unlawful access to personal data are as follows;

- New technological developments are followed and technical measures are taken especially on cyber security systems, and the measures are updated and renewed periodically.
- Access and authorization technical solutions are put into operation within the framework of legal compliance requirements determined in each section of ERTA.
- Access rights are limited and reviewed regularly. Access restriction is applied to old employees and accounts are closed.
- The technical precautions taken in accordance with the internal operation of ERTA are reported to the relevant users, and the necessary risk solutions are re-evaluated and the necessary technological solutions are produced.
- Software and hardware including virus protection systems, data vulnerability security and firewalls are installed.
- Specialized technical personnel are employed.
- All information systems, including applications where personal data are collected, are subject to external impact testing on a regular basis to identify vulnerabilities, and the gaps found based on the results of this test are covered.

9.2.2. Administrative Measures

- Employees, in particular those users who process personal data and all personnel, are trained on administrative measures to prevent unlawful access to personal data.
- In each section of ERTA, legal compliance, access to personal data and authorization processes are applied within the company by considering personal data processing processes.
- The contracts signed between ERTA and the employees describe the scope of the lawful personal data processing activity and there are commitments to comply with these issues.
- ERTA concludes additional agreements having provisions that the persons to whom the personal data are transferred will take the necessary security measures in order to protect the personal data and ensure that these measures are complied with in their own organizations with those who transfer the personal data in accordance with the law.

10. AUDIT OF MEASURES FOR PROTECTION OF PERSONAL DATA

ERTA conducts the necessary audits personally in order to ensure the implementation of the provisions of the Law in its own institution or organization for the duty arising from 12th article of the law and receives support from competent institutions under the name of consultancy if necessary. ERTA, evaluates the participation in related trainings, seminars and information sessions related with Law Of PPD and organizes new trainings in parallel with the updating of the relevant legislation. In addition, in case ERTA receives an external service due to technical requirements for the storage of personal data, additional agreements or agreements involving provisions stating that the relevant companies and the persons to whom the personal data are transferred in accordance with the law shall take the necessary security measures in order to protect the personal data and shall ensure that these measures shall be observed in their own organizations.

11. CONDITIONS OF PROCESSING SPECIAL PERSONAL DATA

Special personal data are sensitive data that are within the scope of fundamental rights and freedoms that are at risk of discrimination when processed unlawfully. For this reason, ERTA takes all kinds of administrative and technical measures including the methods determined by law, regulation and PPD Board in accordance with the principles specified in this PPD Policy and the following conditions are processed in the presence of special personal data;

11.1. Special personal data other than health and sexual life

Personal data other than health and sexual life (race of people, ethnic origin, political thought, philosophical belief, religion, sect or other beliefs, costumes and dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures and biometric and genetic data) may be processed only in cases where expressly required by law. Otherwise, the open consent of the data owner will be sought for the processing of private data of personal data.

11.2. Personal data relating to health and sexual life

Personal data relating to health and sexual life may only be processed for protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing by the persons or relevant persons and institutions under the obligation of the confidentiality without prior consent of personal data holder.

12. PERSONAL DATA TRANSFER

ERTA shall not transfer the data without the express consent of the person concerned without prejudice to the provisions of other laws concerning the transfer of personal data. However, with the condition to take necessary precautions and one of the conditions specified in the law is found, the transfer activity may be carried out by ERTA without the express consent of the person concerned. In this context, in the transfer of data processed by ERTA, all kinds of administrative and technical measures including the methods to be determined by the Board are taken and the personal data is transferred in accordance with the requirements of the personal data transfer specified in Articles 8 and 9 of the PPD Law.

12.1. Compliance with the Conditions for the Domestic Transfer of Personal Data

Personal data cannot be transferred without the express consent of the person concerned. ERTA acts in accordance with the principles of personal data processing in domestic data

transfer activities in accordance with Article 8 of PPD Law.

12.2. Compliance with Conditions for the Transfer of Personal Data Abroad

Personal data cannot be transferred abroad without the express consent of the person concerned. In cases where the country to be transferred is one of the countries having the adequate protection proclaimed by the country's PPD Board or in case of lack of adequate protection in foreign countries, personal data may be transferred to abroad provided that data responsible in Turkey and in the foreign countries shall make a written commitment in writing and the permission of the PPD Board shall be taken.

12.3. Transfer of Special Personal Data

ERTA transfers the special personal data in accordance with 8th and 9th articles of the PPD Act by taking all administrative and technical measures including the methods to be determined by the Board and in the existence of following conditions;

12.3.1. Transferring special personal data other than health and sexual life

In the event that it is expressly mentioned in the law, ERTA may transfer the special personal data other than health and sexual life without seeking the express consent of the data owner. Otherwise, the express consent of the data owner will be obtained.

12.3.2. Transfer of special personal data about health and sexual life

Special Personal data relating to health and sexual life may only be processed for protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing by the persons or relevant persons and institutions under the obligation of the confidentiality without prior consent of personal data holder. Otherwise, the express consent of the data owner will be obtained.

In addition to the above, personal data may be transferred to Foreign Countries with Adequate Protection in the presence of any of the above conditions. In the absence of adequate protection, the personal data may be transferred to the Foreign Countries where the Data Officer undertakes adequate protection and which the Board permits in accordance with the transfer conditions predicted in law.

12.4. Principles in Transferring Personal Data to Third Parties

Even if there is no explicit consent of the personal data owner, personal data can be transferred to third parties by taking the necessary care and taking all necessary security measures including the methods stipulated by the Board if one or more of the conditions stated in articles 5 and 6 of the PPD Law are present, Accordingly;

- Transfer of personal data is expressly stipulated in the law,
- It is an obligation to process the personal data to protect the life or body integrity of the person or another person in cases the person is not in the condition to express his/her consent due to actual impossibility or consent is not validated.
- The processing of personal data of the parties to the contract is required, provided that it is directly related to the establishment or performance of a contract,
- The transfer of personal data is compulsory for ERTA to fulfill its legal obligation,
- Provided that the personal data have been publicized by the data owner, our Company has limited data transmitted for the purpose of publicity,

- The transmission of personal data by the Company is mandatory for the establishment, use or protection of the rights of the Company or the data owner or third parties,
- Providing personal data transfer activities for the legitimate interests of the Company, provided that they do not harm the fundamental rights and freedoms of the data owner.

12.5. Groups of Persons to whom Personal Data is Transferred and Purpose of Transfer

ERTA may transfer the personal data of the data owners within the scope of Law Of PPD Policy to the groups of persons listed below in accordance with the principles of transferring personal data for the purposes specified.

- ERTA is company to ensure that the commercial activities that require the participation of other companies are carried out,
- ERTA, Limited for the purpose of establishing and maintaining business partnership,
- ERTA Suppliers are limited in order to carry out the commercial activities of ERTA,
- Limited to the authorized public institutions and organizations and authorized private law persons for the purpose requested by the persons concerned within the legal authority,
- In accordance with the terms of transferring personal data to third parties.

13. OBLIGATION OF THE DATA RESPONSIBLE TO DISCLOSE THE PERSONAL DATA OWNER

ERTA enlightens the personal data holders in accordance with Article 10 of the PPD Law and the Communiqué on the Procedures and Principles to be followed in the fulfillment of the Obligation to enlightenment. In this context, ERTA informs the persons concerned as to who the personal data is processed by, for what purposes, with which purposes it is shared, by which methods it is collected, and the legal reason and rights of the data owners within the processing of their personal data.

In this context, the following information is provided in the lighting texts presented by ERTA to the data owners;

- The title of our company,
- For which purpose the personal data of the data owners will be processed by ERTA,
- To whom and for what purpose the personal data processed can be transferred,
- Method and legal reason of personal data collection,
- The rights of the data owner;
 - To learn whether personal data is processed,
 - Request information if personal data is processed,
 - Learning the purpose of processing personal data and whether they are used in accordance with their purpose,

- Knowing the third parties to whom personal data is transferred at home or abroad,
- If the personal data is incomplete or incorrectly processed, to request that it be corrected and to request the notification of the transaction to the third parties to whom the personal data has been transferred,
- Although it has been processed in accordance with the provisions of the Law and other relevant laws, to request the deletion or destruction of the personal data in case of the disappearance of the reasons requiring processing and to notify the third parties to whom the personal data has been transferred,
- Object to the occurrence of a result against the person himself by analyzing the processed data exclusively through automated systems,
- In case of damages due to illegal processing of personal data,

14. PROCESSING OF DATA PROVIDED BY ERTA BY ERTA SUBSIDIARIES

The personal data being processed by ERTA can also be processed by ERTA subsidiaries in order to carry out the activities of ERTA in accordance with the principles, objectives and strategies, to protect the rights and interests and reputation of ERTA,. If the personal data sharing between ERTA and the Subsidiary Companies takes place within the scope of the Personal Data Transfer from the Data Officer to the Data Officer within the scope of the Law, the relevant ERTA Company shall enlighten the person concerned that the personal data may be sent to the other ERTA at the collection stage.

15. PERSONAL DATA CATEGORIES

In accordance with the Article 10 of the PPD Law and the Communiqué on the Procedures and Principles to be complied with for the fulfillment of the Obligation of Lighting, the persons concerned are informed at ERTA. personal data are processed in accordance with the general principles specified in the Law, in particular the principles set forth in Article 4 of the Law on the processing of personal data. In this context, the categories of personal data processed within the scope of personal data processing activities are as follows.

Identity Information	It is data that contains information about the person's identity; Name and surname, Turkish identity number, nationality information, place of birth, date of birth, parental information, gender information, workplace information, registration number, tax number, SSI number, signature information, vehicle license plate, title, biography etc. information and documents such as driving license, professional identity card, identity card and passport.
Communication information	Phone number, e-mail address, address, fax number, etc. Information.
Transaction Security Information	Your personal data (log records, IP information, authentication information, etc.) processed to ensure our technical, administrative, legal and commercial security during the conduct of our activities.

Transaction Information	Data such as survey information, declaration information, shopping information, call center records, membership information, records related to the services provided or processed in order to protect the legal and other interests of the Company and the personal data holder within the scope of the activities carried out by ERTA.
Family Members and Close information	Information about the services provided or within the context of the activities carried out by ERTA, or the family members (spouses, mothers, fathers, children, etc.) of the personal data holders processed in order to protect the legal and other interests of the Company and the personal data holder, and other persons that can be reached in case of emergency.
Physical Space Security information	Personal data relating to records and documents received during entry into the physical space, during the stay in the physical space; camera recordings, vehicle information recordings and security point recordings and so on.
Financial Information	The personal data and bank account number of the information, documents and records showing all kinds of financial results created according to the type of legal relationship established by ERTA with the personal data owner, Data such as IBAN number, income information, debt / credit information.
Customer	Real persons whose personal data is obtained through the business relations of ERTA within the scope of the operations carried out by ERTA business units, regardless of whether they have a contractual relationship with ERTA.
Visitor	Real persons who have entered the physical sites of ERTA for various purposes or who have visited our websites.
Employee Candidate	Real persons who have applied to ERTA by any means or who have submitted their resume and relevant information to ERTA for review.
Employee	The activities carried out by ERTA include employee satisfaction, human resources, supervision, security of information technologies and infrastructure, legal compliance, etc. ERTA employees who processed personal data within the framework of activities.
Family Members and Relatives	Spouses, children and relatives of data owners whose personal data are processed under this Policy within the framework of activities carried out by ERTA.
Third Party	Other natural persons not covered by this Policy (guarantor, companion, former employees, etc.).
Suppliers	When carrying out the commercial activities of ERTA, in accordance with the orders and instructions of persons.
Shareholder	ERTA's stockholders are real people.

Company Official	ERTA 's board member Etc. authorized real persons.
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16. PERSONAL DATA OWNERS

Customers	Real persons whose personal data is obtained through the business relations of ERTA within the scope of the operations carried out by ERTA business units, regardless of whether they have a contractual relationship with ERTA.
Visitor	Real persons who have entered the physical sites of ERAT for various purposes or who have visited our websites.
Employee Candidate	Real persons who have applied to ERTA by any means or who have submitted their resume and relevant information to ERTA for review.
Employee	The activities carried out by ERTA include employee satisfaction, human resources, supervision, security of information technologies and infrastructure, legal compliance, etc. ERTA employees who processed personal data within the framework of activities.
Family Members and Relatives	Spouses, children and relatives of data owners whose personal data are processed under this Policy within the framework of activities carried out by ERTA.
Third Party	Other natural persons not covered by this Policy (guarantor, companion, former employees, etc.).
Suppliers	When carrying out the commercial activities of ERTA, in accordance with the orders and instructions of persons.
Shareholder	ERTA's stockholders are real people.
Company Official	ERTA's board member and other authorized real persons.

17. PURPOSE OF PERSONAL DATA PROCESSING

It carries out its activities in line with the following data processing purposes according to the categories of personal data processed by ERTA within the scope of personal data processing activities.

Executed by the Company Commercial Activities For Realization Related Business Units Required by Conducting and Related Business Processes Conducting	Event Management.
	Planning and Execution of Corporate Communication Activities.
	Planning, Auditing and Execution of Information Security Processes.
	Establishment and Management of Information Technology Infrastructure.
	Monitoring of Finance and/or Accounting.
	Corporate Sustainability Planning and Execution of Activities.
	Efficiency / Efficiency and/or Appropriateness Analysis of Business Activities Planning and / or Execution of Realization Activities.
	Planning and Execution of Corporate Governance Activities.
Commercial and/or Business Strategies and Execution	Management of Relations with Business Partners and/or Suppliers.
	Execution of Strategic Planning Activities.
Human Resources Policies and Processes Planning and Execution	Carrying out Personnel Recruitment Processes.
	Employee Demand and Complaint Management.
	Planning analysis and improvement activities related to wage management.
	Planning and supporting the processes of providing benefits and benefits to employees.
	Supporting the planning of employee wage management activities.
	Planning and supporting the processes related to the training and career development of employees.
	Planning and managing processes to increase employee satisfaction and loyalty.
	Internship and / or Student Supply, Placement and Operation Planning and/or Execution of Processes.
	Supporting the management of personnel and managers' appointment and promotion processes.
	Efforts to Protect Values and Reputation realization.
ERTA's Reputation On Commercial Life Your Trust protection	Tracking Customer Requests and/or Complaints.
	Corporate Social Responsibility and/or Civil Planning and/or Execution of Community Activities.
	Supporting fraud and investigation processes.
Planning and Conducting Audits	Activities in accordance with the procedure and the relevant legislation Planning of Audit Activities for Ensuring Execution and Enforcement.
	Monitoring of Legal Affairs.

Ensuring the legal, technical and commercial-job security of the persons involved in the business relationship	Creating and Tracking Visitor Records.
	The Company's Procedures and/or Related Legislation Operational Necessary to Ensure Proper Execution Activities and Planning.
	Ensuring the Security of Company Fixtures and/or Resources.
	Ensuring the Security of Company Operations.
	Giving Information to Authorized Institutions from Legislation.
	Ensuring Accurate and Up-to-Date Data.
	Ensuring the Security of Company Settlements and/or Facilities.
	Planning and Execution of Company Audit Activities.
Audiotry / Visual Information	Photo and camera recordings (except records that are included in the Physical Space Security Information) and audio recordings.
Corporate Memory Information	ERTA's memory to create the institutional memory of the activities carried out by ERTA, such as the moment, interview and so on informations.
Personal Information	People's race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, disguise and dress, associations, foundations or trade union membership, health, sexual life, criminal conviction and data on safety measures and biometric and genetic data.
Legal Procedure and Compliance information	Determination of legal receivables and rights, monitoring and performance of our debts, our legal obligations and compliance with the policies of our company processed personal data.
Audit and Inspection Information	Personal data regarding the operational, financial, fraud and compliance audits of our company.
Claim / Complaint Management information	Personal data relating to the receipt and evaluation of any request or complaint addressed to ERTA.

18. STORAGE AND DISPOSAL OF PERSONAL DATA

ERTA, the personal data required for the purpose of processing and the relevant activity is subject to the legal in accordance with the minimum periods prescribed by the legislation. In this context, our Company first determines whether a period is stipulated in the related legislation for the storage of personal data, and if a period is determined, acts in accordance with this period. If there is no legal deadline, personal data is stored for as long as necessary for the purpose for which it was processed. Personal data is destroyed at the end of the designated storage periods in accordance with the periodic destruction periods or data owner application and by the specified methods of destruction (deletion and/or destruction and/or anonymization).

19. RIGHTS, APPLICATION AND RESPONSE REJECTION OF PERSONAL DATA OWNERS

Pursuant to Article 11 of the PPD Law, personal data holders may apply to ERTA as the data officer and request the following matters concerning themselves.

19.1. Rights of Personal Data Contact

Personal data holders have the following rights:

- To learn whether personal data is processed,
- Request information if personal data is processed,
- Learning the purpose of processing personal data and whether they are used in accordance with their purpose,
- Knowing the third parties to whom personal data is transferred at home or abroad,
- If the personal data is incomplete or incorrectly processed, to request that it be corrected and to request the notification of the transaction to the third parties to whom the personal data has been transferred,
- Although it has been processed in accordance with the provisions of the Law and other relevant laws, to request the deletion or destruction of the personal data in case of the disappearance of the reasons requiring processing and to notify the third parties to whom the personal data has been transferred,
- Object to the occurrence of a result against the person himself by analyzing the processed data exclusively through automated systems,
- In case of damages due to illegal processing of personal data.

19.2. Application for Personal Data Owner

Pursuant to Article 13 (1) of the Law on PPD; <http://erta.com.tr/Content/Images/Content/20210111-08011986.pdf> of our company, which is responsible for data applications to be made with regard to these rights Located in a drea.

19.3. With "Personal Data Holder Application Form";

- With a personally signed application, together with a document providing the identity verification of the applicant,
- Through a notary public,
- By sending the applicant to the registered e-mail address of the company,

19.4. ERTA's Response to Applicant

In accordance with Article 13 of the Law, our Company shall finalize the application requests, together with the reasons, according to the nature of the request and within 30 (thirty) days at the latest. However, if the transaction also requires a cost, you may be charged a fee according to the tariff set by the Personal Data Protection Board. If the response to the application is provided on a

recording medium such as CD, flash memory, a fee may be charged for the cost of the recording medium.

19.5. Rejection of the application by ERTA

ERTA may reject the application of the applicant on the grounds that;

- The processing of personal data by judicial authorities or enforcement authorities with respect to investigations, prosecutions, proceedings or executions.
- The processing of personal data for art, history, literature or scientific purposes or within the scope of freedom of expression, provided that it does not violate national crime, national security, public security, public order, economic security, privacy or privacy rights or constitute a crime.
- Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to provide national defense, national security, public security, public order or economic security,
- Processing of personal data for purposes such as research, planning and statistics through anonymization with official statistics,
- Personal data processing is necessary for crime prevention or crime investigation,
- Processing of personal data publicized by the personal data owner,
- Personal data processing is required for the conduct of supervisory or regulatory duties, and for disciplinary investigation or prosecution by authorized and authorized public institutions and organizations and professional organizations in the nature of public institutions, based on the authority granted by law,
- Personal data processing is necessary for the protection of the economic and financial interests of the State in relation to budget, tax and financial matters,
- The request of the personal data holder is likely to hinder the rights and freedoms of others,
- Requests for disproportionate efforts have been made,
- The requested information is publicly available.

20. SPECIAL CONDITIONS OF PERSONAL DATA PROCESSED BY ERTA

20.1. Monitoring Activities with Security Camera

In order to ensure security by ERTA, monitoring activities are carried out with security cameras at the premises of the building and car park entrance, which are limited to the hallways and production area of the Company building and for the monitoring of guest entrances and exits. Information on this subject can be found on the signs under the cameras and on our website.

Our company operates its surveillance activities in accordance with the Constitution, PPD Law and the provisions and basic principles of this Policy.

20.2. Purpose of Camera Processing Activity

While ERTA processes the personal data during the surveillance operation with the surveillance camera, it acts in accordance with the principles of compliance with the law and the rules of honesty provided for under Article 4 of the PPD Law, with certain and legitimate purposes, and with the principles of processing in a limited and measured manner in connection with the purpose of processing.

To ensure the security of physical space, to protect the production and trade secrets of the company, to ensure the security of company data, to ensure the safety of the owner and other people 's life and property and to protect the legitimate interests of both data owners and the company by the data recording system for the purposes of automatic personal data processing.

There are security cameras in ERTA facilities. We reserve the right to change the number of security cameras in line with the needs of our company. Security camera recording zones are extremely limited and determined by our Company for the purpose of monitoring with security camera. Security camera recording zones; building and facility entrances, corridors, refectory, production site and so on. limited to areas where security risk is high. Meeting rooms, toilets and locker rooms are located outside the security camera recording zones.

Monitoring activity with security camera; The Company is limited to these objectives, both in terms of ensuring the safety of our employees, customers, suppliers and other persons, as well as protecting the Company's trade secrets and customer interests.

For all these purposes, the security camera recording system in our Company is on record 24/7.

20.3. Authorized Access to Records

Access to security camera recordings stored in a digital environment is limited only to those authorized by ERTA and is displayed on their computers or monitors.

Security camera recordings are authorized by the IT Manager himself and his authorized persons. Security guards at the entrance of the parking lot are monitored live and instant from the monitors in order to provide guest entrance and exit controls.

A limited number of persons authorized to access security records declare that they will protect the confidentiality of the data they access through labor contracts, internal policies, safety instructions and confidentiality commitments, and the authenticity of these statements is under constant control.

20.4. Third Party Transferring Camera Recordings

Security camera recordings may be shared ex officio or upon request only with law enforcement and relevant judicial authorities, if necessary, via CD or external memory.

20.5. Retention Time

ERTA, keeps camera recordings for 20 days. These records are automatically deleted by overwriting 1 in 20 days.

20.6. ERTA Building, Facility In and Out of the Guest Entrance and Execution of the Guest Monitoring and Recording

ERTA carries out personal data processing activities in order to ensure security in all enterprises and to monitor the guest entrances and exits in ERTA buildings and facilities for the purposes specified in this PPD Law and Policy.

The names and surnames of the persons coming to ERTA buildings as a guest are obtained or the personal data holders are illuminated in this context by means of texts which are hung by ERTA or made available to the guests in other ways. The data obtained for the purpose of guest entry-exit tracking are processed only for this purpose and the related personal data are recorded to the data recording system in physical environment.

21. ERTA 'S OBLIGATION TO REGISTER TO DATA REGISTER

ERTA shall be registered in the Data Responsible Register in accordance with the period specified in the Law determined by the PPD Law. Additional information and documents that may be required by the PPD Law Information to be submitted to the Registry of Data Officers, except;

- Identity and address information of ERTA and its representative, if any,
- The purpose for which personal data will be processed,
- Information about the group and groups of data subject and the data categories of these persons,
- The recipient or recipient groups to which personal data can be transferred,
- Personal data intended to be transferred to foreign countries,
- Personal data security measures,
- The maximum time required for the purpose for which personal data is processed.

22. IMPLEMENTATION OF POLICY AND RELATED LEGISLATION

This Policy; ERTA 's PPD Law and other relevant legislation, regulations and communiques are intended to embody the rules and is intended to serve the purpose of determining and guiding a special arrangement. In addition to the internal policies for the protection and processing of personal data, which are related to the principles that ERTA has set out with this policy, it also constitutes basic policies for ERTA Companies. In this context, ERTA will analyze the data processing activities carried out by guiding this policy, determine all the necessary actions, ensure compliance with this policy by operating the internal audit system, and this compliance will be maintained with continuous updates.

In addition to the internal audit application by ERTA, continuous studies will be carried out to ensure the awareness of the employees, training and seminars will be given. Compliance processes will be implemented for newly recruited employees and necessary arrangements will be made in our Company's relations with its subsidiaries and business partners. Legal regulations on the processing and protection of personal data, It will be applied as a priority within ERTA. However, in case of any inconsistency or conflict between the legislation in force and this Policy, our Company accepts that the legislation in force will find its application and make the related arrangements.