

# PROTECTION AND PROCESSING OF PERSONAL DATA POLICY AND CONSENT TEXT OF CMK KABLO ELEKTRİK SANAYİ İÇ VE DIŞ TİCARET LTD. ŞTİ.

## 1. PURPOSE AND SCOPE

CMK Kablo Elektrik Sanayi İç ve Dış Ticaret Ltd. Şti ("CMK Kablo" or "Company") has embraced since its past to show its utmost care in compliance with the rule of law and also sets up systems for executing any required activity in terms of regulatory compliance with the processing and protection of personal data.

In line with the importance that CMK Kablo attaches to the protection of personal data, the CMK Kablo PPD Policy and the basic principles regarding the compliance of the activities carried out by CMK Kablo with the regulations contained in the Personal Data Protection Law No. 6698 ("PPD Law") are determined. With the implementation of CMK Kablo PPD Policy regulations, the data security principles adopted by CMK Kablo shall be made sustainable.

The CMK Kablo PPD Policy applies to natural persons whose personal data are processed by CMK Kablo automatically or through non-automatic means provided that they are part of any data recording system, but matters relating to the protection of the personal data of CMK Kablo employees are regulated in this policy.

## 2. GOAL

CMK Kablo PPD Policy aims to establish the necessary systems and to ensure compliance with the legislation in line with the objective of raising awareness about the lawful processing and protection of personal data within CMK Kablo.

In this context, CMK Kablo is intended to guide the implementation of the PPD Policy, the PPD Law and the regulations laid down by the relevant legislation.

## 3. DEFINITIONS

**Express Consent** : Consent to a particular subject, based on information and disclosed with free will.

**Anonymization**; Rendering personal data unlikely to be associated with any identified or identifiable real person in any way even when personal data is paired with other data,

**Communiqué on Procedures and Principles to be Followed in Fulfillment of the Disclosure Obligation**: Communiqué on the Principles and Procedures to be implemented in the performance of the Disclosure obligation which was published in the Official Gazette No. 30356 dated 10 March 2018.

**Employee (s) :** CMK Kablo Employees

**Employee PPD Policy :** This policy regulates the principles for the protection and processing of your personal data.

**Personal Data :** Any information relating to a specific or identifiable natural person.

**Personal Data Owner :** The real person whose personal data has been processed. For example; customers and employees.

**Processing of Personal Data:** All kinds of processes performed on personal data including obtaining, recording, storing, keeping, changing, re-arranging, disclosure, transmission, acquisition, making available, classification or prevention of use in whole or in part, automatically or in non-automatic ways, being part of any data recording system

**PPD Law:** Law on the Protection of Personal Data dated 24 March 2016 and numbered 6698 published in the Official Gazette dated 7 April 2016 and no. 29677.

**PPD Board :** Personal Data Protection Board.

**PPD Agency:** Personal Data Protection Agency.

**PPD Compliance Program :** Program put in place by CMK Kablo to ensure compliance with legislation on the protection of personal data.

**Private Personal Data :** Biometric and genetic data and data related to race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, disguise, association or union membership, health, sex life, criminal conviction and security measures.

**CMK Kablo Personal Data Storage and Disposal Policy :** Personal Data Storage and Disposal Policy, which is the basis for the deletion, destruction and anonymization of personal data by CMK Kablo with the maximum period of time required for the purpose for which the personal data are processed in accordance with the Regulation on Deletion, Destruction and Anonymization of Personal Data.

**CMK Kablo PPD Policy :** Personal Data Protection and Processing Policy.

**CMK Kablo Suppliers :** Parties providing services to CMK Kablo on a contractual basis.

**CMK Kablo Data Owner Application Form :** Application form to be used by data owners when using their applications for their rights under Article 11 of the Law on PPD.

**Data Representative** : The real person who processes personal data on behalf of the data controller under the authority granted by the data controller.

**Data Controller** : The person who determines the purposes and means of processing personal data and manages the place where the data are systematically held.

**Data Controllers Register** : Data Officers Register, which is kept under the supervision of the PPD Board, under the supervision of the Personal Data Protection Authority and is open to the public.

**Communiqué on Application Procedures and Principles to the Data Controller:** Communiqué on Application Procedures and Principles to the Data Controller published and enacted in the Official Gazette dated March 10, 2018 and numbered 30356.

## 4. ROLES AND RESPONSIBILITIES

While **General Manager** is responsible for the implementation of CMK Kablo PPD Policy in all CMK Kablo operations, activities and processes; CMK Kablo Procurement Unit and CMK Kablo Attorney shall be the guides for the implementation of the regulations, procedures, guide standards and training activities prepared in accordance with CMK Kablo PPD Policy by the Consultant Özgür Çiftçi within CMK Kablo. All of our employees, stakeholders, guests, visitors and related third parties throughout CMK Kablo are obliged to cooperate with CMK Kablo Attorney together with Consultant Özgür Çiftçi in preventing legal risks and imminent danger in compliance with CMK Kablo PPD Policy. All organs and departments of CMK Kablo are responsible for observing compliance with CMK Kablo PPD Policy.

## 5. PRINCIPLES OF CMK Kablo PPD POLICY

### 5.1. GROUPS OF PEOPLE MANAGED BY CMK KABLO PPD POLICY

Data owners within the scope of CMK Kablo PPD Policy whose personal data are processed by CMK Kablo are grouped as follows:

- **CMK Kablo Employee Candidates**  
Persons who have not been contracted for service with CMK Kablo but have been evaluated for CMK Kablo to be established.
- **CMK Kablo Partners Officials, Employees**  
Real person officials, shareholders, employees of the organizations in which CMK Kablo is in commercial relationship.
- **CMK Kablo Visitors**  
Real persons visiting CMK Kablo premises or CMK Kablo operated websites.

- **Other Real Persons**

CMK Kablo Workers All natural persons not covered by the Personal Data Protection and Processing Policy.

## 5.2 PURPOSES OF PROCESSING PERSONAL DATA WITHIN THE SCOPE OF BUSINESS ACTIVITIES CARRIED OUT BY CMK KABLO

Main Objectives	Sub-Objectives
Identification, planning and implementation of CMK Kablo short / medium / long term commercial policies	<ol style="list-style-type: none"> <li>1. Planning and execution of external training activities</li> <li>2. Managing relationships with business partners and suppliers</li> </ol>
Design and Execution of CMK Kablo Human Resources Activities	<ol style="list-style-type: none"> <li>1. Execution of employee procurement processes</li> <li>2. Planning and execution of intern and student procurement, placement and operation processes</li> <li>3. Planning human resources processes</li> <li>4. Fulfillment of obligations arising from employment contract and legislation for company employees</li> <li>5. Monitoring and supervision of employees' business activities</li> <li>6. Planning and execution of benefits and benefits for employees</li> <li>7. Planning and execution of employee exit procedures</li> <li>8. Planning and monitoring performance evaluation processes of employees</li> <li>9. Planning and execution of in-house training activities</li> <li>10. Managing relationships with business partners and suppliers</li> <li>11. Fee management</li> <li>12. Planning and execution of internal orientation activities</li> </ol>
Performance of Necessary Works by Business Units within CMK Kablo and Conducting Activities in accordance with CMK Kablo's Commercial Activities in accordance with Legislation Policies	<ol style="list-style-type: none"> <li>1. Follow-up of finance and accounting affairs</li> <li>2. Planning and execution of corporate communication activities</li> <li>3. Planning and execution of efficiency/efficiency and in-situ analyses of business activities</li> <li>4. Establishment and management of information technology infrastructure</li> <li>5. Planning, supervision and execution of information security processes</li> <li>6. Planning and execution of business continuity activities</li> <li>7. Planning and execution of information access authorizations of business partners and suppliers</li> </ol>

Supporting the design, planning and execution of CMK Kablo human resources activities	<ol style="list-style-type: none"> <li>1. Supporting CMK Kablo in planning human resources strategies</li> <li>2. Monitoring and announcing the transfer, temporary assignment, promotion and dismissal of CMK Kablo employees</li> <li>3. Supporting the planning and execution of the processes of measuring employee loyalty of CMK Kablo employees</li> <li>4. Supporting CMK Kablo Companies employee procurement processes</li> </ol>
Protecting CMK Kablo's commercial reputation and confidence	<ol style="list-style-type: none"> <li>1. Demand and complaint management</li> <li>2. Carrying out studies to protect the reputation of community and community values</li> </ol>

## 6. PRINCIPLES ADOPTED BY CMK KABLO REGARDING THE PROCESSING AND PROTECTION OF PERSONAL DATA

### 6.1 CARRYING OUT PERSONAL DATA PROCESSING ACTIVITIES IN ACCORDANCE WITH THE DATA PROCESSING REQUIREMENTS

CMK Kablo acts in accordance with (i) basic principles, (ii) personal data processing requirements and (iii) special quality personal data processing requirements when conducting its personal data processing activities.

#### 6.1.1 Compliance with Basic Principles

CMK Kablo adopts the following basic principles within the scope of compliance with personal data protection legislation and maintaining compliance:

**(1) Processing personal data in accordance with the law and the rules of integrity**

CMK Kablo carries out its personal data processing activities in accordance with the law and honesty rules, especially the Constitution of the Republic of Turkey, in accordance with the legislation on the protection of personal data.

**(2) Ensuring the accuracy and timeliness of the personal data processed**

While the processing of personal data is carried out by CMK Kablo, all necessary administrative and technical measures are taken to ensure the accuracy and updating of personal data within the technical possibilities. In this context, our company has established mechanisms to correct and verify the accuracy of personal data owners' personal data if they are incorrect.

**(3) Processing of personal data for specific, explicit and legitimate purposes**

The processing of personal data by CMK Kablo is carried out within express and lawful purposes determined before the commencement of the personal data processing activity.

**(4) Processing personal data in a purpose-related, limited and measured manner**

CMK Kablo processes personal data in connection with the data processing requirements and as necessary for the performance of these services. In this context, the purpose of personal data processing is determined before the commencement of the personal data processing activity and no data processing activity is carried out on the assumption that it can be used in the future.

**(5) Keeping personal data for as long as is required by the relevant legislation or for the purpose for which they are processed**

CMK Kablo maintains personal data for a limited period of time as stipulated in the relevant legislation or as required for the purpose of data processing. In this direction, if the period stipulated in the legislation expires or the reasons requiring the processing of personal data disappear, the personal data are erased, destroyed or anonymized by CMK Kablo.

## **6.1.2 Compliance with Personal Data Processing Requirements**

CMK Kablo carries out its personal data processing activities in accordance with the data processing requirements set forth in Article 5 of the PPD Law. In this context, the personal data processing activities carried out are carried out in the presence of the following personal data processing conditions:

**(1) Presence of the explicit consent of the Personal Data Owner**

Personal data processing is carried out by CMK Kablo if the data owner gives his/her consent to the processing of the data about him/her, freely, with sufficient knowledge of the data owner, in a way that leaves no room for doubt and limited to that process.

**(2) Clearly Predicted of Personal Data Processing Activity in the Laws**

In the event that there is an explicit regulation in the laws relating to the personal data processing activity, the personal data processing activity may be carried out by CMK Kablo, limited to the relevant legal regulation.

**(3) Failure to Obtain the Data Owner's Express Consent Due to Actual Impossibility and Compulsory Processing of Personal Data**

In cases where the personal data owner cannot disclose his/her consent or his/her consent is not recognized, if it is compulsory to process personal data in order to protect the life or body integrity of the persons, data processing activity is carried out by CMK Kablo in this context.

**(4) The Personal Data Processing Activity is Directly Related to the Establishment or Performance of a Contract**

In cases directly related to the establishment or performance of a contract, if the processing of personal data belonging to the parties to the contract is necessary, data processing activity is carried out by CMK Kablo.

**(5) Mandatory Performance of Personal Data Processing Activity for CMK Kablo to Fulfil Legal Obligation**

In the event that the legal obligation of CMK Kablo, which has been adopted as the Company policy for showing the necessary sensitivity in compliance with the law, is in question, personal data processing is carried out in order to fulfil the legal obligation.

**(6) Data Owner's Making Personal Data Public**

CMK Kablo processes personal data publicized by the person concerned (in any way disclosed to the public) in accordance with the purpose for which they are publicized.

**(7) Mandatory Data Processing for the Establishment, Use or Protection of a Right**

In case the processing of personal data is mandatory for the establishment, use or protection of a right, personal data processing is carried out by CMK Kablo in parallel with this obligation.

**(8) Conduct of Personal Data Processing Activity on the condition that it does not harm the Fundamental Rights and Freedoms of the Data Owner is Mandatory for the Legitimate Interests of CMK Kablo**

For the legitimate interests of CMK Kablo, data processing may be carried out if personal data processing is compulsory and the fundamental rights and freedoms of the data owner are not harmed.

**6.1.3. Compliance with Specific Personal Data Processing Requirements**

CMK Kablo also attaches importance to the processing of special quality personal data that pose a risk of discrimination when processed unlawfully. In this context, CMK Kablo primarily determines whether there are sensitive data processing conditions in the processing of special quality personal data, data processing activities are carried out after it is ensured that there is a legal compliance requirement.

Specific personal data may be processed by CMK Kablo provided that adequate measures are taken as determined by the PPD Board in the following cases:

**(1) Processing of Personal Health Data**

Personal health data can be processed by CMK Kablo in the presence of one of the following conditions: – by persons or competent authorities and organizations under an obligation to keep secrets for the purpose of the protection of public health, the conduct of preventive medicine, medical diagnosis, treatment and care services, the planning and management of health services and their financing; or – the existence of explicit consent of the personal data owner,

**(2) Processing of Private Personal Data Other than Health and Sexual Life**

CMK Kablo may process special personal data other than health and sexual life (biometric and genetic data and data related to race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, costume and clothing, association, foundation or trade union membership, health, sex life, criminal conviction and security measures and biometric and genetic data); if the data owner gives explicit consent or if required by law.

#### **6.1.4 Compliance with Personal Data Transfer Requirements**

Personal data transfers to be carried out by CMK Kablo are carried out in accordance with the personal data transfer requirements regulated in Articles 8 and 9 of the PPD Law.

##### **(1) Domestic Transfer of Personal Data**

In accordance with Article 8 of the PPD Law, CMK Kablo shall comply with the data processing requirements in the data transfer activities to be carried out domestically (See CMK Kablo PPD Policy Section 6.1).

##### **(2) Transfer of Personal Data Abroad .**

Personal data as per Article 9 of PPD Law may be transferred by CMK Kablo provided that (i) they are in compliance with the requirements of personal data processing (See CMK Kablo PPD Policy Section 6.1.) and (ii) in the case that the country to be transferred is from countries with adequate protection announced by the PPD Board, or if there is insufficient protection in the relevant foreign country, the data holders in Turkey and the relevant foreign country can be transferred abroad by committing a sufficient protection in writing and having the approval of the PPD Board.

##### **(3) CMK Kablo Personal Data Transfer Person Groups**

CMK Kablo refers to the data owners within the scope of CMK Kablo PPD Policy in accordance with Articles 8 and 9 of the PPD Law (See CMK Kablo PPD Policy Section 5.2.) may transfer their personal data to the following groups of persons for the following purposes:

- (i) To CMK Kablo Suppliers, limited to the supply of CMK Kablo from the supplier to perform CMK Kablo's commercial activities,
- (ii) Authorized public institutions and organizations and authorized private legal persons, limited to the purpose requested by the relevant persons within the legal authority,
- (iii) In accordance with the terms of transferring personal data to third parties.

#### **6.2 INFORMING PERSONAL DATA OWNERS BY CMK KABLO**

CMK Kablo carries out the necessary processes to ensure that data owners are informed during the acquisition of personal data in accordance with Article 10 of the PPD Law and the Communiqué on Procedures and Principles to be Followed in Fulfillment of the Disclosure Obligation. In this context, the lighting texts provided by CMK Kablo to the data owners contain the following information:

- (1) The title of our company,
- (2) For what purpose the personal data of the data owners will be processed by CMK Kablo,
- (3) To whom and for what purpose the processed personal data can be transferred,
- (4) Method and legal reason for personal data collection,



- (5) The rights of the data owner;
- (a) To find out if their personal data are processed,
  - (b) Requesting information if their personal data has been processed,
  - (c) To find out the purpose of the processing of personal data and whether they are used in accordance with their purpose,
  - (d) To know the third parties to whom personal data are transferred at home or abroad,
  - (e) Requesting correction of personal data in case of incomplete or incorrect processing and requesting notification of the transaction to third parties where the personal data are transferred,
  - (f) Requesting the deletion or destruction of personal data within the framework of the foreseen conditions and requesting that the transaction be notified to the third parties to whom the personal data are transferred,
  - (g) Object to the emergence of a result against the person by analyzing the processed data exclusively through automated systems,
  - (h) Requesting the compensation of the damage if the personal data is damaged due to unlawful processing.

## **6.3 CONCLUSION OF REQUESTS OF PERSONAL DATA OWNERS BY CMK KABLO**

In the event that the data owners submit their requests regarding their personal data to our Company in writing or by other methods determined by the PPD Board, CMK, acting as the Kablo Data Controller, carries out the necessary processes in accordance with Article 13 of the PPD Law to ensure that the request is concluded as soon as possible and within thirty (30) days at the latest according to the nature of the request. Data owners should carry out their requests regarding their personal data in accordance with the Communiqué on Application Procedures and Principles to the Data Controller and CMK Kablo application guide.

CMK Kablo may request information in order to determine whether the applicant owns the personal data owner to the application within the scope of ensuring data security. Our company may also ask the personal data owner about his application in order to ensure that the personal data owner's application is concluded in accordance with the request.

In cases where the application of the data owner is likely to hinder the rights and freedoms of other persons, requires disproportionate effort, and the information is public information, the request may be rejected by CMK Kablo by explaining the reason.

### **6.3.1 Rights of Personal Data Owners**

Pursuant to Article 11 of the Law on PPD, you may apply to our Company and request the following:

- (1) To find out if your personal data are processed,
- (2) Requesting information about your personal data if it has been processed,
- (3) To find out whether your personal data are used in accordance with the purpose of processing and their purpose,

- (4) To learn about the third parties in which your personal data is transferred domestically or abroad,
- (5) Requesting correction of your personal data if they are incomplete or incorrectly processed and requesting that the third parties to whom your personal data are transferred be informed of the action taken within this scope,
- (6) Requesting the deletion, destruction or anonymization of your personal data in the event that the reasons requiring processing are eliminated despite being processed in accordance with the provisions of the Law on PPD and other relevant laws, and requesting that the transaction carried out in this context be notified to the third parties to whom your personal data are transferred,
- (7) Object to the emergence of a result against you by analyzing your processed data exclusively through automated systems,
- (8) Requesting compensation if you suffer damage due to unlawful processing of your personal data.

### **6.3.2 Conditions Excluding the Rights of Personal Data Subjects Due to Legislation**

Pursuant to Article 28 of the Law on PPD, it will not be possible for personal data owners to assert their rights in the following matters as the following situations are not within the scope of the Law on PPD:

- (1) Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that it does not violate or constitute a crime against national defence, national security, public security, public order, economic security, privacy or personal rights.
- (2) Processing of personal data for purposes such as research, planning and statistics by anonymizing them with official statistics.
- (3) Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defence, national security, public security, public order or economic security.
- (4) Processing of personal data by judicial authorities or enforcement authorities in relation to investigations, prosecutions, trials or executions.

Pursuant to Article 28/2 of the PPD; it will not be possible for the personal data owners to assert their rights except to request the compensation of the damage in the cases listed below:

- (1) Personal data processing is necessary for the prevention of crime or for the investigation of crime.
- (2) Processing of personal data made public by the personal data owner.
- (3) Personal data processing is necessary for disciplinary investigation or prosecution by competent public institutions and organizations and professional organizations in the nature of public institutions, based on the authority granted by the law, for the execution of supervisory or regulatory tasks.
- (4) The processing of personal data is necessary for the protection of the economic and financial interests of the state in relation to budget, tax and financial matters.

#### **6.4 CMK CATEGORIES OF PERSONAL DATA PROCESSED WITHIN THE SCOPE OF PERSONAL DATA PROCESSING ACTIVITIES CARRIED OUT BY Kablo AND CATEGORIES OF SHARED PARTIES**

The categories and descriptions of personal data processed within the scope of the personal data processing activities carried out by CMK Kablo are as follows:

<b>PERSONAL DATA CATEGORIES</b>	<b>DESCRIPTION</b>
Identification Information	Personal data containing information about the identity of the person; documents such as name, surname, driver's license, identity card and passport containing information such as TR ID number, nationality information, mother's name-father's name, place of birth, date of birth, gender and tax number, SGK number, signature information, vehicle license plate, etc.
Communication Information	Contact information; personal data such as phone number, address, e-mail address, fax number.
Family Members and Relative Information	Personal data about family members (e.g. spouse, mother, father, child) and relatives of the personal data owner in order to protect the legal interests of CMK Kablo and the data owner within the framework of operations conducted by CMK Kablo.
Physical Space Safety Information	Personal data relating to the records and documents received at the entrance to the physical space, during the stay in the physical space; camera records, and records taken at the security point, etc.
Transaction Security Information	Personal data processed to ensure the technical, administrative, legal and commercial security of both the data owner and the Company when conducting the commercial activities of CMK Kablo.
Risk Management Information	Personal data processed through methods used in accordance with generally accepted rules of law, business practice and integrity in these fields for the management of commercial, technical and administrative risks.
Financial Information	Personal data, such as bank account number, IBAN number, credit card information, financial profile, asset data, income information and personal data related to information, documents and records showing all kinds of financial results created within the scope of the legal relationship between CMK Kablo and the data owner.
Employee Candidate Information	Personal data processed about individuals who have applied to become CMK Kablo employees or who have been evaluated as Employee Candidates in line with the human resources needs of our Company due to commercial custom and honesty rules or who have a working relationship with our Company.

Legal Action and Compliance Information	Personal data processed within the scope of determination, follow-up and performance of legal receivables and rights of CMK Kablo and legal obligations and compliance with CMK Kablo policies.
Audit and Inspection Information	Personal data processed within the scope of CMK Kablo's legal obligations and compliance with Company policies.
Private Personal Data	The data specified in Article 6 of the PPD (e.g. health data, including blood type, biometric data, religion and membership association information).
Claim/Complaint Management Information	Personal data regarding the receipt and evaluation of all kinds of requests or complaints directed to CMK Kablo.
Reputation Management Information	Personal data associated with the person and collected to protect CMK Kablo's commercial reputation (e.g., CMK Kablo related posts).

#### 6.4.2. Shared Party Categories

CMK Kablo refers to the data owners within the scope of CMK Kablo PPD Policy in accordance with the principles contained in the PPD Law and in particular Articles 8 and 9 of the PPD Law (See Section 5.1.) personal data may be transferred to the following groups of persons for the following purposes:

- (i) CMK Kablo Suppliers,
- (ii) CMK Kablo Partners,
- (iii) Authorized public institutions and organizations and authorized private law persons,
- (vi) to other third parties in accordance with the data transfer requirements.

The scope and possible purposes of the data transfer of the persons mentioned above are given below.

PERSONS TO WHOM DATA TRANSFER CAN BE MADE	DESCRIPTION	DATA TRANSFER PURPOSE
Supplier	Parties providing services to CMK Kablo in accordance with CMK Kablo's orders and instructions and on a contractual basis within the scope of the conduct of CMK Kablo's commercial activities	Limited to the services provided by the Company from the supplier and required for the performance of the Company's commercial activities
Legally Authorized Public Institutions and Organizations	According to the provisions of the relevant legislation, the Company is authorized to	For the purpose requested by the relevant public institutions and

	obtain information and documents from public institutions and	organizations within their legal authority
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	organizations	as limited
Legally Authorized Private Legal Persons	Private legal persons authorized to receive information and documents from the Company according to the provisions of the relevant legislation	Limited to the purpose requested by the relevant private legal persons within their legal authority

## 6.5. ENSURING THE SECURITY AND CONFIDENTIALITY OF PERSONAL DATA BY CMK KABLO

CMK Kablo shall take all necessary measures to prevent unlawful disclosure, access, transfer of personal data or other security deficiencies that may occur, within the scope of possibilities, according to the nature of the data to be protected.

In this context, all kinds of (i) administrative and (ii) technical measures are taken by CMK Kablo,

(iii) an audit system is established within the company and (iv) in case of unlawful disclosure of personal data, it is acted in accordance with the measures stipulated in the PPD Law.

### (1) Administrative Measures Taken by CMK Kablo to Ensure the Legal Processing of Personal Data and Prevent Illegal Access to Personal Data

- (a) CMK Kablo trains its employees and ensures their awareness regarding the legislation on the protection of personal data.
- (b) In cases where personal data is subject to transfer, it is ensured that records are added to the contracts concluded by CMK Kablo with the persons to whom the personal data are transferred that the party to whom the personal data are transferred will fulfil its obligations to ensure data security.
- (c) The personal data processing activities carried out by CMK Kablo are examined in detail, in this context, the steps to be taken to ensure compliance with the personal data processing requirements stipulated in the PPD Law are determined.
- (d) CMK Kablo determines the practices to be fulfilled in order to ensure compliance with the PPD Law and regulates these practices with internal policies.

### (2) Technical Measures Taken by CMK Kablo to Ensure Legal Processing of Personal Data and Prevent Illegal Access to Personal Data

- (a) Regarding the protection of personal data by CMK Kablo, technical measures are taken to the extent possible and the measures taken are updated and improved in line with the developments.
- (b) In technical matters, expert personnel are employed.
- (c) Audits are carried out at regular intervals for the implementation of the measures taken.
- (d) Software and systems are installed to ensure security.
- (e) The authority to access personal data being processed within CMK Kablo is limited to the relevant employees for the specified processing purpose.

**(3) Conducting Audit Activities on Protection of Personal Data by CMK Kablo**

The compliance, functioning and effectiveness of the technical measures, administrative measures and practices taken within the scope of protection and security of personal data by CMK Kablo with the relevant legislation, policies, procedures and instructions are supervised by the consultant. The Consultant may carry out the said audit activity by its own organization or may have outsourced audit firms carry out the audit activity if it deems it necessary. The results of the audit activities carried out within this scope are reported to CMK Kablo company managers. It is the responsibility of the process owners to regularly monitor the planned actions regarding the audit results.

**(4) Measures to be taken in case of Non-Legal Disclosure of Personal Data** Within the scope of the personal data processing activity carried out by CMK Kablo , if the personal data is obtained illegally by unauthorized persons, the situation shall be notified to the PPD Board and the relevant data owners without delay.

**6.6. IDENTIFICATION OF THE UNIT RESPONSIBLE FOR THE PROTECTION AND PROCESSING OF PERSONAL DATA**

CMK Kablo has established the "Personal Data Protection Unit" which will provide the necessary coordination within the Company within the scope of ensuring, maintaining and maintaining compliance with the legislation on the protection of personal data. The Personal Data Protection Unit is responsible for the implementation and improvement of the systems established in order to ensure the unity between CMK Kablo departments and the compliance of the activities carried out with the legislation on the protection of personal data.

**7. REVIEW**

This Policy document takes effect from the moment it is approved by CMK Kablo administrators. The Quality Officer has been authorized by CMK Kablo managers to make changes to the Policy and how it will be put into effect, except for the repeal of this Policy.

Implementing rules to be issued in accordance with this Policy and specifying how the matters specified in this Policy shall be performed in particular shall be regulated in the form of a regulation.

In any case, this Policy shall be reviewed once a year and, if necessary, updated by submitting it to CMK Kablo managers and Quality Officer for approval.

In the event of a conflict between the legislation in force on the protection and processing of personal data and CMK Kablo PPD Policy, CMK Kablo agrees that the legislation in force will find an area of application.

CMK Kablo PPD Policy is published on CMK Kablo website (<http://www.cmkkablo.com>) and is accessible to personal data owners. In parallel with the changes and innovations to be made in the relevant legislation, changes to CMK Kablo PPD Policy will be made available to data owners in a way that data owners can easily access.