

# HURREM SULTAN HAMAMI

## CORPORATE PERSONAL DATA PROTECTION POLICY

*English Translation*

<b>Document Name:</b>	Personal Data Protection Policy
<b>Document Subject:</b>	The purpose of the Personal Data Protection Policy is to plan the processes for the protection of personal data by Hurrem Sultan Hamami and to determine the principles to be applied regarding this matter.
<b>Publication Date:</b>	22.01.2026
<b>Version No:</b>	1
<b>Reference / Justification:</b>	Law No. 6698 on the Protection of Personal Data and other applicable legislation

**Approval Authority: Hurrem Sultan Hamami Board of Managers**

### 1. PURPOSE

Every individual's right to request the protection of personal data concerning themselves is a sacred right arising from the Constitution. As Hurrem Sultan Hamami, we consider fulfilling the requirements of this right to be one of our most valuable duties. For this reason, we attach importance to the lawful processing and protection of your personal data.

The Corporate Personal Data Protection Policy has been prepared as a result of the importance we attach to the protection of personal data, in order to determine the principles we take as a basis and the procedures we apply while processing and protecting personal data.

### 2. SCOPE

This Policy covers all kinds of operations performed on all personal data managed by Hurrem Sultan Hamami, such as obtaining, recording, storing, preserving, changing, reorganizing, disclosing, transferring, taking over, making available, classifying, or preventing the use of data, by fully or partially automatic means or by non-automatic means provided that they are part of any data recording system.

This Policy relates to all processed personal data of Hurrem Sultan Hamami's partners, authorized persons, customers, employees, supplier officials and employees, and third parties.

Hurrem Sultan Hamami may amend the Policy for the purposes of compliance with legislation and the decisions of the Personal Data Protection Authority, and for better protection of personal data.

### 3. DEFINITIONS

<b>Abbreviation / Term</b>	<b>Definition</b>
<b>Recipient Group</b>	The category of natural or legal persons to whom personal data are transferred by the data controller.
<b>Explicit Consent</b>	Consent relating to a specific subject, based on information, and declared with free will.
<b>Anonymization</b>	Rendering personal data impossible to associate with an identified or identifiable natural person in any way, even by matching them with other data.
<b>Data Subject</b>	The natural person whose personal data are processed.
<b>Relevant User</b>	Persons who process personal data within the data controller organization or in line with the authorization and instruction received from the data controller, excluding the person or unit responsible for the technical storage, protection, and backup of the data.

<b>Destruction</b>	Deletion, destruction, or anonymization of personal data.
<b>Law / KVKK</b>	Law No. 6698 on the Protection of Personal Data.
<b>Recording Medium</b>	Any medium in which personal data processed by fully or partially automatic means or by non-automatic means, provided that they are part of any data recording system, are located.
<b>Personal Data</b>	Any information relating to an identified or identifiable natural person.
<b>Data Inventory</b>	The inventory created by data controllers by associating their personal data processing activities carried out depending on their business processes with the purposes and legal grounds of processing personal data, data category, transferred recipient group, and data subject group, and detailing the maximum retention period required for the purposes for which personal data are processed, personal data envisaged to be transferred to foreign countries, and measures taken regarding data security.
<b>Processing of Personal Data</b>	All kinds of operations performed on data, such as obtaining, recording, storing, preserving, changing, reorganizing, disclosing, transferring, taking over, making available, classifying, or preventing the use of personal data, by fully or partially automatic means or by non-automatic means provided that they are part of any data recording system.
<b>Commission</b>	The Personal Data Protection Commission established by Hurrem Sultan Hamami to manage the Policy and other related procedures and to ensure the enforcement of the Policy.
<b>Board</b>	The Personal Data Protection Board.
<b>Authority</b>	The Personal Data Protection Authority.
<b>Special Categories of Personal Data</b>	Data relating to persons' race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal conviction and security measures, and biometric and genetic data.
<b>Periodic Destruction</b>	The deletion, destruction, or anonymization process to be carried out ex officio at recurring intervals specified in the personal data retention and destruction policy if all personal data processing conditions set forth in the Law cease to exist.
<b>Policy</b>	Personal Data Protection Policy.
<b>Data Processor</b>	The natural or legal person who processes personal data on behalf of the data controller based on the authorization granted by the data controller.
<b>Data Controller</b>	The natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system.

## 4. GENERAL PRINCIPLES

Hurrem Sultan Hamami checks the compliance of the data to be processed with the following principles during the preparation phase of every business workflow that requires new personal data processing. Workflows that are not found appropriate are not implemented.

Hurrem Sultan Hamami, while processing personal data:

- (I) Complies with the law and the rules of honesty.
- (II) Ensures that personal data are accurate and, where necessary, up to date.
- (III) Pays attention to ensuring that the purpose of processing is specific, explicit, and legitimate.
- (IV) Checks that the processed data are related to the purpose of processing, are processed only to the extent necessary, and are proportionate.

(V) Retains data only for the period prescribed in the relevant legislation or required for the purpose of processing, and destroys them when the purpose of processing ceases to exist.

## 5. DUTIES AND RESPONSIBILITIES

A Personal Data Protection Commission has been established within Hurrem Sultan Hamami to manage this Policy and other related procedures regarding the processing of personal data and to ensure the enforcement of the Policy. The Commission consists of an authorized representative on behalf of the Board of Managers, the accounting department, the human resources department, the information technologies department, and the security unit. In addition, Hurrem Sultan Hamami receives KVKK consultancy support when necessary in order to ensure compliance with Law No. 6698 on the Protection of Personal Data. The Commission may invite the KVKK consultant to its meetings if deemed necessary.

The duties and responsibilities of the Commission are listed below.

- (I) It ordinarily meets once every 6 months. If circumstances require, extraordinary meetings may be held, for example in the event of a possible data breach.
- (II) It discusses matters that need to be amended or improved in the Policy.
- (III) It determines the matters that may be fulfilled for the lawful processing and protection of personal data.
- (IV) The Commission determines the steps that may be taken to increase KVKK awareness within the company and among business partners.
- (V) It identifies risks that may be encountered regarding the processing and protection of personal data and takes the necessary administrative and technical measures.
- (VI) It ensures communication with the Authority and manages relations.
- (VII) It evaluates requests received from the Data Subject.
- (VIII) It follows up periodic destruction processes.
- (IX) It updates the Data Inventory.
- (X) It makes assignments regarding the matters listed above.

## 6. MEASURES TAKEN FOR DATA SECURITY

Hurrem Sultan Hamami takes all necessary technical and administrative measures to ensure an appropriate level of security in order to (i) prevent the unlawful processing of personal data, (ii) prevent unlawful access to personal data, and (iii) ensure the preservation of personal data.

### 6.1. Technical Measures

- (I) Network security and application security are ensured.
- (II) Security measures are taken within the scope of the procurement, development, and maintenance of information technology systems.
- (III) Access logs are kept regularly.
- (IV) Up-to-date antivirus systems are used.
- (V) Firewalls are used.
- (VI) Necessary security measures are taken regarding entries and exits to physical environments containing personal data.
- (VII) The security of physical environments containing personal data against external risks such as fire and flood is ensured.
- (VIII) The security of environments containing personal data is ensured.
- (IX) Personal data are backed up, and the security of backed-up personal data is also ensured.
- (X) A user account management and authorization control system is implemented and monitored.
- (XI) Log records are kept in a manner that does not allow user intervention.

(XII) Intrusion detection and prevention systems are used.

(XIII) Encryption is applied.

## **6.2. Administrative Measures**

(I) Disciplinary regulations containing data security provisions are in place for employees.

(II) Training and awareness activities on data security are carried out for employees at certain intervals.

(III) Corporate policies on access, information security, use, retention, and destruction have been prepared and put into practice.

(IV) Data masking measures are applied when necessary.

(V) Confidentiality undertakings are executed.

(VI) An authorization matrix has been created for employees.

(VII) The authorizations in this area of employees whose duties change or whose employment ends are removed.

(VIII) Signed contracts contain data security provisions.

(IX) Personal data security policies and procedures have been determined.

(X) Personal data security issues are reported quickly.

(XI) Personal data security is monitored.

(XII) Personal data are minimized as much as possible.

(XIII) Periodic and/or random internal audits are carried out and caused to be carried out.

(XIV) Existing risks and threats have been identified.

(XV) Protocols and procedures for the security of special categories of personal data have been determined and implemented.

(XVI) If special categories of personal data are to be sent by electronic mail, they are always sent encrypted and by using a registered electronic mail (KEP) account or a corporate mail account.

(XVII) Awareness of service providers acting as data processors regarding data security is ensured.

## **7. RIGHTS OF THE DATA SUBJECT REGARDING PERSONAL DATA**

The Data Subject may apply to Hurrem Sultan Hamami and make requests regarding the matters listed below:

(I) To learn whether their personal data are processed.

(II) To request information if their personal data have been processed.

(III) To learn the purpose of processing their personal data and whether they are used in accordance with that purpose.

(IV) To learn the third parties to whom their personal data are transferred domestically or abroad.

(V) To request the correction of their personal data if they have been processed incompletely or incorrectly, and to request notification of the transaction carried out within this scope to third parties to whom the personal data have been transferred.

(VI) Although processed in accordance with the KVKK and other relevant laws, to request the deletion, destruction, or anonymization of their personal data if the reasons requiring their processing cease to exist, and to request notification of the transaction carried out within this scope to third parties to whom their personal data have been transferred.

(VII) To object to the emergence of a result against them by means of analysis of their processed data exclusively through automated systems.

(VIII) To request compensation for damages if they suffer damage due to the unlawful processing of their personal data.

## **8. BREACH NOTIFICATIONS**

Hurrem Sultan Hamami employees report to the Commission any work, action, or fact that they think violates the provisions of the KVKK and/or the Policy. Following such breach notification, the Committee convenes if deemed necessary and creates an action plan regarding the breach.

If the breach occurs through the unlawful acquisition of personal data by others, the Commission notifies the relevant person and the Board within 72 hours within the scope of the Board's decision dated 24.01.2019 and numbered 2019/10.

## **9. AMENDMENTS**

Amendments to the Policy are prepared by the Commission and submitted to the approval of the Hurrem Sultan Hamami Board of Managers. The updated Policy may be sent to employees by e-mail or published on the website.

## **10. EFFECTIVE DATE**

This version of the Policy entered into force upon approval by the Board of Managers on .....