

This document is a translation of the original Turkish text.

PERSONAL DATA PROTECTION AND PROCESSING POLICY

1. INTRODUCTION

a) Introduction

At Aksoy Araştırma Eğitim ve Danışmanlık Ltd. Şti. ("Company"), we attach the utmost importance to the lawful protection and processing of Personal Data under the Law on the Protection of Personal Data No. 6698 ("Law"), and exercise this care in all our planning and activities. As a Company, we view the protection and processing of Personal Data, which underpin privacy, as more than a matter of regulatory compliance; the value we place on people is fundamental to our approach. With this awareness, we take all administrative and technical measures necessary to protect and process Personal Data.

b) Purpose and Scope

This Personal Data Protection and Processing Policy ("Policy") sets out the Company's approach to Personal Data protection and establishes the procedures and principles for ensuring that all of the Company's operations relating to Personal Data are carried out lawfully within the framework of the Law.

This Policy aims to ensure full regulatory compliance in the Personal Data protection and processing activities carried out by our Company, and to safeguard Data Subjects' rights to privacy and data security.

The Policy has been prepared for Company Shareholders, Company Business Partners, Company Officers, Job Applicants, Visitors, Company Customers, Research Participants, Prospective Customers, website visitors, Third Parties and all other individuals connected with the Company, provided they are natural persons, and applies to these persons. This Policy does not apply to legal entities in any capacity.

The Company informs these Data Subjects about the Law by publishing this Policy on its website.

If there is any inconsistency between this Policy and the Law or other relevant legislation, the provisions of the legislation shall apply.

c) Definitions

The terms used in the application of this Policy have the meanings set out below:

Explicit Consent: Consent relating to a specific matter, based on information and given freely.

Anonymisation: Altering Personal Data irreversibly so that they cease to qualify as Personal Data. For example, using masking, aggregation, data perturbation or similar techniques to prevent personal data from being associated with an identifiable individual.

Application Form: The “Application Form for Requests by the Data Subject to the Data Controller Pursuant to the Law on the Protection of Personal Data No. 6698”, through which personal data subjects apply to exercise their rights.

Job Applicant: A natural person who has applied to our Company for employment by any means or has made their CV and related information available for our Company's review.

Employees, Shareholders and Officers of Organisations with Which We Cooperate: Natural persons working at organisations with which the Company has any form of business relationship, including but not limited to business partners, suppliers and customers, together with those organisations' shareholders and officers.

Business Partner: Parties with which the Company establishes business partnerships in the course of its commercial activities, either directly or together with Group Companies, for purposes such as undertaking various projects or obtaining services.

Law: The Law on the Protection of Personal Data No. 6698.

Processing of Personal Data: Any operation performed on Personal Data, such as obtaining, recording, storing, retaining, modifying, reorganising, disclosing, transferring, receiving, making available, classifying or preventing their use, by wholly or partly automated means, or by non-automated means provided they form part of a data filing system.

Board: The Personal Data Protection Board.

Data Subject/Individual Concerned: Company Shareholders, Company Business Partners, Company Officers, Job Applicants, Visitors, Company Customers, Prospective Customers and Third Parties whose Personal Data are processed.

Personal Data: Any information relating to an identified or identifiable natural person.

Company Customer: A natural person who uses or has used the products and services offered by our Company, regardless of whether they have a contractual relationship with our Company.

Special Categories of Personal Data: Data relating to race, ethnic origin, political opinions, philosophical beliefs, religion, denomination or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sex life, criminal convictions and security measures, and biometric and genetic data.

Prospective Customer: A natural person who has expressed a request or interest in using our products and services, has requested a quotation from the Company, or is considered likely to have such an interest in accordance with commercial practice and the principles of good faith.

Company/Our Company: Aksoy Araştırma Eğitim ve Danışmanlık Ltd. Şti.

Company Shareholder: A natural person who is a shareholder of Aksoy Araştırma Eğitim ve Danışmanlık Ltd. Şti.

Company Business Partner, or a Business Partner's Shareholder, Officer or Employee: All natural persons with whom our Company has any form of business relationship, together with employees, shareholders and officers of natural or legal persons with which our Company has any form of business relationship, such as business partners or suppliers.

Company Officer: A board member or other authorised natural person of Aksoy Araştırma Eğitim ve Danışmanlık Ltd. Şti.

Third Party: Other persons who do not fall within the scope of the Aksoy Araştırma Eğitim ve Danışmanlık Ltd. Şti. Personal Data Protection and Processing Policy prepared for Company Employees, and who do not fall into any Data Subject category under this Policy.

Data Processor: A natural or legal person who processes Personal Data on behalf of the Data Controller under the authority granted by that controller.

Data Filing System: A filing system in which Personal Data are structured and processed according to specific criteria.

Data Controller: The person who determines the purposes and means of processing Personal Data and manages the place in which the data are held systematically.

Visitor: Any natural person who enters our Company's physical premises for various purposes or visits our websites for any purpose.

2. ENSURING DATA SECURITY

In accordance with the Law, our Company takes all necessary technical and administrative measures to ensure an appropriate level of security, prevent unlawful processing of and access to Personal Data, and ensure their safekeeping.

a) Technical Measures

Our Company establishes, or arranges the establishment of, all technical infrastructure necessary to process Personal Data in accordance with the Law and ensure data security, and updates this infrastructure in line with legislation.

For this purpose, it uses firewalls, gateway applications and similar methods against unauthorised access threats. Employees' access to systems containing Personal Data is restricted by defining the scope of their authorisation. Access authorisation and control matrices are used accordingly.

b) Auditing

Our Company conducts and commissions the audits necessary to establish the data security described above and ensure the consistent and continuous application of the measures taken, and prepares the necessary audit reports.

c) Training

Company employees, officers and representatives are regularly informed, by department, about processing Personal Data in accordance with the Law and this Policy.

d) Confidentiality

Company Employees and, where Third Parties are engaged in processing Personal Data, the relevant Third Parties are informed, and the necessary provisions are included in contracts.

e) Unauthorised Disclosure of Personal Data

If Personal Data processed by our Company are obtained unlawfully by others, our Company takes the necessary steps to notify the relevant Data Subject and the Board as soon as possible. If the Board considers it necessary, the incident may be announced on the Board's website or by another method it deems appropriate.

f) Respecting Data Subjects' Legal Rights

Our Company respects all Data Subjects' legal rights in applying this Policy and the Law, and takes all measures necessary to protect those rights.

3. PROCESSING OF PERSONAL DATA

a) General Principles for Processing Personal Data

Our Company processes Personal Data in accordance with the procedures and principles prescribed by the Law and this Policy. When processing Personal Data, our Company complies with the following principles:

i. Processing Personal Data lawfully and in accordance with the principles of good faith. ii. Keeping Personal Data accurate and, where necessary, up to date. iii. Processing Personal Data for specific, explicit and legitimate purposes. iv. Ensuring that Personal Data are relevant, limited and proportionate to the purposes for which they are processed. v. Retaining Personal Data for the periods prescribed by relevant legislation or required for the purposes for which they are processed. b) Purposes of Processing Personal Data

Our Company processes your Personal Data for the following purposes:

i. Implementing our Company's human resources policy. ii. Properly planning and carrying out our Company's commercial partnerships and strategies. iii. Ensuring the legal, commercial and physical security of our Company and our business partners. iv. Ensuring our Company's organisational functioning. v. Undertaking activities to enable you to benefit as fully as possible from the products and services offered by our Company. vi. Customising the products and services offered by our Company to your demands, needs and wishes, and recommending them to you. vii. Ensuring the highest level of data security. viii. Creating the databases necessary for the Company to continue its activities. ix. Improving the services offered on our Company's website. x. Contacting those who submit requests and complaints to our Company. xi. Resolving errors on our Company's website. xii. Ensuring security at Company premises. c) Methods and Legal Basis for Collecting Personal Data

Personal Data are collected in oral, written or electronic form, through technical and other methods and various channels such as the call centre, our Company's website and mobile applications, to achieve the purposes set out in this Policy. Collection is based on legal grounds arising from legislation, contracts, requests and demands, to fulfil statutory responsibilities completely and correctly. The data are processed by our Company or by data processors appointed by our Company.

d) Classification of Personal Data

Our Company processes the following Personal Data in accordance with this Policy:

- i. Identity Information: Data relating to a person's identity, including full name, Turkish identity number, marital status, educational background, occupation, income status, nationality, parents' full names, place and date of birth, gender and other identity information; driving licences, identity cards, passports and other documents containing that information; tax number, Social Security Institution (SGK) number, signature details, vehicle registration number and other information.
- ii. Contact Information: Telephone number, address, email address, fax number, IP address and other information.
- iii. Transaction Security Information: Personal data processed in the course of the Company's activities relating to the technical, administrative, legal and commercial security of both the Data Subject and the Company.
- iv. Financial Information: Personal data processed in relation to information, documents and records showing all financial consequences of the employer-employee relationship between the Company and the Individual Concerned, together with bank account number, branch code, bank card details, IBAN, credit card details, financial profile, credit rating, asset data, income information and other information.
- v. Visual and Audio Information: Photographs, camera recordings, audio recordings, all data containing these and other information.
- vi. Personnel Information: All personal data processed to obtain information forming the basis for protecting the employment rights of natural persons in a working relationship with the Data Subject.
- vii. Location Information: Information identifying the location of the Individual Concerned while using Company or Group Company vehicles within the activities and operations of the Company, its group companies or the companies and organisations with which it cooperates; GPS location, travel data and other information.
- viii. Family Member and Next-of-Kin Information: Identity and contact information, as defined above, relating to the Individual Concerned's family members (such as spouse, mother, father and children), relatives and other emergency contacts, within the activities and operations of the Company, its group companies or the companies and organisations with which it cooperates, or to protect the legal and other interests of the Company and the Individual Concerned.
- ix. Physical Premises Security Information: Personal data relating to records and documents obtained on entry to or during a stay at physical premises, including camera recordings, fingerprint records, records taken at security checkpoints and other data.
- x. Legal Proceedings Information: Data processed in connection with establishing and pursuing the Company's legal claims and rights, fulfilling its debts and meeting its statutory obligations.
- xi. Special Categories of Personal Information: Data specified under Article 6 of the Law, including health data, biometric data, religion, association membership and other such information.
- xii. Request/Complaint Management

Information: Personal data relating to the receipt and assessment of requests or complaints addressed to our Company. e) Conditions for Processing Personal Data

Our Company does not process Personal Data without the Data Subject's explicit consent. However, Personal Data may be processed without explicit consent where one of the following conditions specified in the Law applies:

i. Processing is expressly provided for by law. ii. Processing is necessary to protect the life or physical integrity of a person who is physically unable to express consent or whose consent is not legally valid, or of another person. iii. Processing the personal data of the parties to a contract is necessary, provided that it is directly related to the establishment or performance of that contract. iv. Processing is necessary for our Company to fulfil a legal obligation. v. The Personal Data have been made public by the Data Subject/Individual Concerned. vi. Processing is necessary to establish, exercise or protect a right. vii. Processing is necessary for our Company's legitimate interests, provided that it does not harm Data Subjects' fundamental rights and freedoms. f) Conditions for Processing Special Categories of Personal Data

Our Company does not process Special Categories of Personal Data without the Individual Concerned's explicit consent. However, Personal Data other than those relating to health and sex life may be processed without explicit consent in the circumstances provided for by law. Personal Data relating to health and sex life are processed by our Company without explicit consent only for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care,

and the planning and management of healthcare services and their financing, in circumstances where we are subject to an obligation of confidentiality.

g) Transfer of Personal Data

Our Company may transfer the Personal Data it obtains, for the stated purposes, to our shareholders, business partners, suppliers, subsidiaries, companies and organisations with which we cooperate, companies from which we procure external services to fulfil contractual or statutory obligations (in areas such as security, healthcare, occupational safety and law), and authorised institutions and organisations. Personal Data are not transferred without the Data Subject's explicit consent. However, Personal Data may be transferred without explicit consent where one of the following conditions specified in the Law applies:

i. There is an express legal provision for the transfer of Personal Data. ii. The transfer is necessary to protect the life or physical integrity of the Data Subject or another person, and the Data Subject is physically unable to express consent or their consent is not legally valid. iii. The transfer of the contracting parties' Personal Data is necessary, provided that it is directly related to the establishment or performance of a contract. iv. The transfer is necessary for our Company to fulfil a legal obligation. v. The Personal Data have been made public by the Data Subject. vi. The transfer is necessary to establish, exercise or protect a right. vii. The transfer is necessary for our Company's legitimate interests, provided that it does not harm the Data Subject's fundamental rights and freedoms.

Personal Data other than those relating to health and sex life may be processed without the Individual Concerned's explicit consent in the circumstances provided for by law.

h) Conditions for Transferring Personal Data Abroad

Our Company may transfer the Personal Data it obtains to third parties abroad for the stated purposes, taking the necessary security measures. Personal Data are not transferred abroad without the Data Subject's explicit consent. Our Company may transfer Personal Data to foreign countries declared by the Board to offer adequate protection or, where adequate protection is not available, to foreign countries where the data controllers in Türkiye and the relevant foreign country undertake in writing to provide adequate protection and the Board has granted permission.

4. ERASURE, DESTRUCTION AND ANONYMISATION OF PERSONAL DATA

Our Company retains Personal Data processed in accordance with the Law, other relevant legislation and this Policy for the periods prescribed by legislation, where such periods exist. Where no period is prescribed, it retains them for a period determined according to the purpose of processing.

When the reasons requiring the processing of Personal Data cease to exist, our Company erases, destroys or anonymises the relevant Personal Data during the periodic destruction interval specified in the Personal Data Destruction Policy, or at the Data Subject's request.

Our Company's methods and relevant periods for destroying Personal Data are set out in detail in the Personal Data Destruction Policy.

5. RIGHTS OF THE DATA SUBJECT

Under Article 11 of the Law, Data Subjects may exercise the following rights in relation to their Personal Data obtained by our Company:

i. Find out whether their Personal Data are being processed. ii. Request information about the processing of their Personal Data, if they have been processed. iii. Find out the purpose of processing their Personal Data and whether they are being used in accordance with that purpose. iv. Know the third parties to whom their personal data have been transferred within Türkiye or abroad. v. Request rectification of their Personal Data if they have been processed incompletely or inaccurately. vi. Request the erasure or destruction of their Personal Data under the conditions specified in Article 7 of the Law. vii. Request that actions taken under Article 11(d) and (e) of the Law be notified to third parties to whom the personal data have been transferred. viii. Object to a result arising to their detriment through analysis of the processed data exclusively by automated systems. ix. Claim compensation if they suffer damage as a result of unlawful processing of their Personal Data.

For detailed information about the rights listed above, you can contact us by email at aksoy@aksoyarastirma.com.

Under Article 13(1) of the KVK Law and the Communiqué on the Procedures and Principles for Applications to the Data Controller, you may exercise the rights listed above by completing the

Personal Data Subject Application Form available on our website. You may submit it in person, through a notary, by registered post with acknowledgement of receipt addressed to the relevant Company at Kozyatağı Mah. Gülbahar Sok., No:12/19 Kadıköy, İstanbul, Türkiye, or by other methods specified in the Law. Alternatively, you may scan the form and send it to aksoy@aksoyarastirma.com using a secure electronic signature, a mobile signature or the email address you previously provided to our Company and which is registered in our systems. Our Company will resolve the requests in your application free of charge as soon as possible, and within thirty days at the latest, depending on their nature. However, if the procedure entails an additional cost, a fee may be charged in accordance with the tariff determined by the Board.

Our Company may accept the request or reject it with an explanation of its reasons, and will notify the individual of its response in writing or electronically. If the request in the application is accepted, our Company will take the necessary action.

If an application is rejected, the response is considered inadequate or no response is provided within the prescribed period, the data subject has the right to lodge a complaint with the Board within thirty days of learning of the response and, in all cases, within sixty days of the application date.

6. CHANGES TO OUR POLICY

Our Company may amend this Policy from time to time as required by its activities or by law. Such changes take effect when the amended Policy is published at “www.aksoyarastirma.com”. Customers, employees and officers will also be notified of changes by email.