



KOLUMAN PERSONAL DATA PROTECTION AND PRIVACY POLICY



1. Purpose

Within the scope of the Koluman Holding Joint Stock Company Personal Data Protection and Processing Policy, the principles adopted in the personal data processing activities carried out by our Company and the fundamental principles regarding compliance with the provisions set forth in Law No. 6698 on the Protection of Personal Data are established; within this framework, personal data subjects are informed and the necessary transparency is ensured.

2. Scope

This Policy applies to all personal data processed in relation to individuals other than our Company's employees.

The activities carried out by Koluman Holding regarding the protection of employees' personal data are governed under the Koluman Holding Joint Stock Company Employees' Personal Data Protection and Processing Policy.

3. Application of Legislation

The applicable legal regulations currently in force regarding the processing and protection of personal data shall primarily apply. In the event of any inconsistency between the applicable legislation and this Policy, our Company acknowledges that the provisions of the applicable legislation shall prevail.

4. Matters Regarding the Protection of Personal Data

The applicable legal regulations currently in force concerning the processing and protection of personal data shall primarily apply. In the event of any inconsistency between the applicable legislation and this Policy, our Company acknowledges that the provisions of the applicable legislation shall prevail.

4.1. Ensuring the Security of Personal Data

In accordance with Article 12 of the Law, our Company takes the necessary technical and administrative measures, depending on the nature of the data to be protected, in order to prevent the unlawful disclosure, access, transfer, or other security breaches of personal data.

Within this scope, our Company takes measures to ensure an adequate level of security in line with the guidelines published by the Personal Data Protection Board and conducts or commissions audits accordingly.

4.2. Protection of Special Categories of Personal Data

Under the Law, certain personal data are attributed special importance due to the risk of victimization or discrimination that may arise if they are processed unlawfully. Such data include information relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, membership in associations, foundations or trade unions, health data, sexual life, criminal convictions and security measures, as well as biometric and genetic data.

Koluman Holding exercises the utmost care in protecting personal data classified as special categories under the Law and processed in compliance with the law. In this regard, the technical and administrative measures adopted for the protection of personal data are also meticulously implemented for special categories of personal data, and the necessary periodic audit activities are carried out.

4.3. Awareness and Audit

Koluman Holding ensures that the necessary training programs are organized for relevant business units in order to increase awareness and to prevent the unlawful processing of personal data and unauthorized access thereto, and to ensure the secure storage of personal data. To enhance employees' awareness of personal data protection, Koluman Holding establishes the necessary systems and receives support from expert consultants where required. Accordingly, our Company monitors participation in relevant training, seminar, and information activities, and regularly updates and renews training content in line with amendments to the applicable legislation.

5. Matters Regarding the Processing of Personal Data

5.1. Processing of Personal Data in Compliance with the Principles Set Forth in the Legislation

5.1.1. Processing in Compliance with the Principles of Lawfulness and Fairness

Koluman Holding acts in accordance with the principles determined by legal regulations, as well as the principles of good faith and fairness, during the processing of personal data. Within this scope, personal data are processed only to the extent required by the business activities carried out by our Company.

5.1.2. Ensuring That Personal Data Are Accurate and Up to Date

Koluman Holding takes the necessary measures to ensure that personal data are kept accurate and up to date throughout the processing period and establishes mechanisms at regular intervals to maintain the accuracy and currency of personal data.

5.1.3. Processing for Specific, Explicit and Legitimate Purposes

Koluman Holding clearly and explicitly determines the purposes for processing personal data and carries out personal data processing activities within the scope of legitimate purposes related to its business activities.

5.1.4. Relevance, Limitation and Proportionality

Koluman Holding collects personal data only to the extent and in the manner required by its business activities and processes such data in a manner limited to the determined purposes of processing.

5.1.5. Retention for the Period Required by the Relevant Legislation or the Purpose of Processing

Koluman Holding retains personal data for the period required for the purpose of processing and for the minimum retention periods stipulated under the applicable legislation governing the relevant activity. Where no specific retention period is prescribed under the legislation, personal data are retained only for the period necessary for the purpose for which they are processed. Following the expiration of the retention periods, personal data are disposed of in accordance with periodic disposal schedules or data subject requests by using the designated disposal methods (deletion and/or destruction and/or anonymization).

5.2. Conditions for the Processing of Personal Data

Personal data may be processed based on one or more of the conditions set forth below:

i. Obtaining the Explicit Consent of the Personal Data Subject

One of the conditions for processing personal data is obtaining the explicit consent of the data subject. Explicit consent must relate to a specific processing activity and be given freely based on adequate information. However, if any of the personal data processing conditions listed below are present, personal data may be processed without obtaining the explicit consent of the data subject.

ii. Explicit Provision in Laws

Personal data may be processed where it is explicitly stipulated in the applicable laws.

iii. Inability to Obtain Explicit Consent Due to De Facto Impossibility

Personal data of the data subject may be processed if it is mandatory to process such data for the protection of the life or physical integrity of the data subject or another person, where the data subject is unable to express consent due to de facto impossibility or where consent cannot be legally recognized.

iv. Direct Relevance to the Establishment or Performance of a Contract

Where the processing of personal data is necessary for the establishment or performance of a contract to which the data subject is a party, this condition shall be deemed to be fulfilled.

v. Fulfillment of the Company's Legal Obligations

Personal data of the data subject may be processed where processing is mandatory for Koluman Holding to fulfill its legal obligations.

vi. Public Disclosure of Personal Data by the Data Subject

Where personal data have been made public by the data subject, such personal data may be processed, provided that processing is limited to the purpose of disclosure.

vii. Necessity for the Establishment, Exercise or Protection of a Right

Personal data of the data subject may be processed where processing is mandatory for the establishment, exercise, or protection of a right.

viii. Necessity for Processing for the Legitimate Interests of the Company

Personal data of the data subject may be processed where processing is mandatory for the legitimate interests of Koluman Holding, provided that such processing does not harm the fundamental rights and freedoms of the data subject.

5.3. Processing of Special Categories of Personal Data

Special categories of personal data are processed by Koluman Holding in accordance with the principles set forth in this Policy and by taking all necessary administrative and technical measures, provided that one of the conditions specified below is met:

(i) Special categories of personal data other than health and sexual life data may be processed without obtaining the explicit consent of the data subject where explicitly stipulated by law. In other cases, explicit consent of the data subject must be obtained.

(ii) Special categories of personal data relating to health and sexual life may be processed without obtaining explicit consent by persons or authorized institutions and organizations under an obligation of confidentiality, for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning and management of health services and their financing. In all other cases, explicit consent of the data subject shall be obtained.

5.4. Informing the Personal Data Subject

Koluman Holding informs personal data subjects in accordance with Article 10 of the Law and the relevant secondary legislation. In this context, Koluman Holding provides information regarding the identity of the data controller, the purposes of processing personal data, the recipients and purposes of data transfers, the methods and legal grounds for data collection, and the rights of personal data subjects concerning the processing of their personal data.

5.5. Processing of Data Processed by Group Companies by Koluman Holding

For the purposes of conducting the activities of group companies in line with group principles, objectives, and strategies, and protecting the rights, interests, and reputation of group companies, personal data processed by group companies may also be processed by Koluman Holding to the extent necessary.

5.6. Transfer of Personal Data

Koluman Holding may transfer personal data and special categories of personal data to third parties within the framework of the provisions set forth in Article 8 of the Law, provided that the necessary security measures are taken and in line with lawful personal data processing purposes. Even in the absence of the explicit consent of the personal data subject, personal data may be transferred to third parties by Koluman Holding, provided that due care is exercised and all necessary security measures, including the methods prescribed by the Personal Data Protection Board, are taken, where one or more of the following conditions exist:

- The activities related to the transfer of personal data are explicitly stipulated by law,
- The transfer of personal data by Koluman Holding is directly related to and necessary for the establishment or performance of a contract,
- The transfer of personal data is mandatory for Koluman Holding to fulfill its legal obligations,
- The personal data have been made public by the data subject, provided that the transfer is limited to the purpose of disclosure,
- The transfer of personal data is mandatory for the establishment, exercise, or protection of the rights of Koluman Holding, the data subject, or third parties,
- The transfer of personal data is mandatory for the legitimate interests of Koluman Holding, provided that it does not harm the fundamental rights and freedoms of the data subject,
- The transfer of personal data is mandatory for the protection of the life or physical integrity of the data subject or another person who is unable to express consent due to de facto impossibility or whose consent is not legally valid.

In addition to the matters set forth above, personal data may be transferred to foreign countries declared by the Board to have an adequate level of protection, provided that one of the above-mentioned conditions exists. Where adequate protection is not available, personal data may be transferred to foreign countries in accordance with the data transfer conditions stipulated under the legislation, provided that the data controllers in Türkiye and the relevant foreign country have undertaken in writing to ensure adequate protection and the permission of the Board has been obtained.

5.6.1. Transfer of Special Categories of Personal Data

Special categories of personal data may be transferred by Koluman Holding by taking all necessary administrative and technical measures, provided that one of the following conditions exists:

(i) Special categories of personal data other than health and sexual life data may be transferred without obtaining the explicit consent of the data subject where explicitly stipulated by law. In other cases, explicit consent of the data subject must be obtained.

(ii) Special categories of personal data relating to health and sexual life may be transferred without obtaining explicit consent by persons or authorized institutions and organizations under an obligation of confidentiality, for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning and management of health services and their financing. In all other cases, explicit consent of the data subject shall be obtained.

In addition to the above, personal data may be transferred to foreign countries with an adequate level of protection where one of the above conditions exists. Where adequate protection is not available, data transfers may be made to foreign countries where the data controller providing adequate protection is located, in accordance with the data transfer conditions stipulated under the applicable legislation.

6. Storage and Disposal of Personal Data

Our Company stores personal data for the period required by the purpose for which they are processed and within the minimum retention periods stipulated under the applicable legal legislation governing the relevant activity. Where no specific retention period is prescribed under the legislation, personal data are stored only for the period necessary for the purpose for which they are processed.

Following the expiration of the determined retention periods, personal data are disposed of in accordance with periodic disposal schedules or data subject requests by using the designated disposal methods, including deletion and/or destruction and/or anonymization.

7. Rights of Personal Data Subjects

7.1. Rights of the Personal Data Subject

Personal data subjects have the following rights:

- To learn whether personal data are being processed,
- To request information regarding personal data if they have been processed,
- To learn the purpose of processing personal data and whether such data are used in accordance with their purpose,
- To know the third parties to whom personal data are transferred, whether domestically or abroad,
- To request the correction of personal data in the event that such data are processed incompletely or inaccurately, and to request that the actions taken in this scope be notified to third parties to whom the personal data have been transferred,
- To request the deletion or destruction of personal data where the reasons requiring their processing cease to exist, even though the data have been processed in accordance with the Law and other applicable legislation, and to request that the actions taken in this scope be notified to third parties to whom the personal data have been transferred,
- To object to the occurrence of a result against the data subject arising from the analysis of processed data exclusively through automated systems,
- To claim compensation for damages incurred due to the unlawful processing of personal data.

7.2. Exercising the Rights of the Personal Data Subject

Personal data subjects may submit their requests regarding their rights to our Company through the methods determined by the Personal Data Protection Board.

Within this scope, applications may be submitted via the Data Subject Application Form prepared in accordance with the application procedures and principles determined by our Company.

Our Company takes the necessary administrative and technical measures to conclude applications submitted by personal data subjects in compliance with the Law and secondary legislation.

Where a personal data subject submits a request regarding their rights to our Company, such request shall be concluded free of charge as soon as possible and, in any case, within a maximum period of thirty (30) days, depending on the nature of the request. However,

where the transaction requires an additional cost, a fee may be charged in accordance with the tariff determined by the Board.

8. Special Circumstances in Which Personal Data Are Processed

8.1. Personal Data Processing Activities Conducted at Building and Facility Entrances and Within Buildings and Facilities, and Website Visitors

For the purpose of ensuring security, Koluman Holding carries out personal data processing activities through security camera surveillance in Koluman Holding buildings and facilities, as well as through the monitoring of visitor entry and exit records.

8.2. Camera Surveillance Activities Conducted at and Within Koluman Holding Buildings and Facilities

For the purpose of ensuring security at buildings and facilities, Koluman Holding conducts camera surveillance activities in accordance with the Law on Private Security Services and the relevant legislation.

Koluman Holding carries out security camera surveillance activities at its buildings and facilities in line with the purposes stipulated under the applicable legislation and in compliance with the personal data processing conditions set forth in the Law.

In accordance with Article 10 of the Law, Koluman Holding informs personal data subjects regarding camera surveillance activities through multiple methods. Furthermore, in accordance with Article 4 of the Law, personal data are processed in a manner that is relevant, limited, and proportionate to the purpose for which they are processed.

The purpose of maintaining video camera surveillance activities by Koluman Holding is limited to the purposes set forth in this Policy. Accordingly, the areas monitored by security cameras, the number of cameras, and the monitoring periods are determined in a manner sufficient to achieve security purposes and limited to such purposes. Areas that may result in interference with personal privacy beyond security purposes, such as restrooms, are not subject to surveillance.

Access to live camera footage and digitally recorded and stored data is restricted to a limited number of authorized Koluman Holding employees. Individuals who have access to such records undertake, through confidentiality commitments, to protect the confidentiality of the data they access.

8.3. Monitoring of Visitor Entry and Exit at and Within Koluman Holding Buildings and Facilities

For the purpose of ensuring security and in line with the objectives specified in this Policy, Koluman Holding carries out personal data processing activities related to the monitoring of visitor entry and exit at its buildings and facilities.

While obtaining the name and surname information of visitors entering Koluman Holding buildings, personal data subjects are informed through notices posted at building entrances or other information texts made available to visitors.

Personal data obtained for the purpose of monitoring visitor entry and exit are processed solely for this purpose, and such personal data are recorded in data recording systems maintained in physical environments.

9. Entry into Force and Updates

Date of First Publication	Revision Date/No.	Explanation
27 May 2022	02 January 2026	Updated with extensions.



ANNEXES

1. Purposes of Personal Data Processing
2. Personal Data Subjects
3. Categories of Personal Data
4. Third Parties to Whom Personal Data Are Transferred

Annex 1 – Purposes Of Personal Data Processing

MAIN PURPOSES	SECONDARY PURPOSES
Conducting the Company's Commercial Activities	Event management
	Management of corporate communication activities
	Management of information security processes
	Conducting financial operations
	Management of sustainability activities
	Conducting corporate governance activities
Conducting the Company's Commercial Relations	Management of relations with business partners
	Management of strategic planning activities
Management of Group Human Resources Policies and Processes	Management of employee requests and complaints
	Management of fringe benefits and additional benefit processes of group employees
	Management of processes related to the training and career development of group employees
	Management of processes aimed at increasing employee engagement
	Conducting recruitment processes
	Management of appointment and promotion processes
	Management of internship processes
Protection of the Group's Reputation	Monitoring and handling customer requests and complaints
	Conducting Corporate Social Responsibility activities
	Conducting whistleblowing notification and investigation processes
Conducting Audit Activities	Compliance audits
	Monitoring and handling legal affairs
Ensuring the Legal, Technical and Commercial Security of Stakeholders	Creation and monitoring of visitor records
	Ensuring the security of company assets and operations
	Providing information to authorized institutions as required by legislation
	Ensuring the security of company campuses and facilities

Annex 2 – Personal Data Subjects

PERSONAL DATA SUBJECT CATEGORY	DESCRIPTION
Group Customer	Natural persons whose personal data are obtained within the scope of the activities carried out by Group Companies, regardless of whether they have any contractual relationship with Koluman Holding.
Visitor	Natural persons who enter the physical premises owned by Koluman Holding or visit its websites.
Job Applicant	Natural persons who have applied for a job at Koluman Holding by any means or who have submitted their résumés for review.
Group Employee	Individuals employed within Group Companies whose personal data are processed within the scope of business activities.
Family Members and Relatives	Spouses, children, and relatives of personal data subjects.
Third Party	Other natural persons not covered by this Policy (e.g., guarantors, companions, former employees, etc.).
Koluman Holding Supplier	Employees, authorized representatives, and shareholders of suppliers providing contract-based services to Koluman Holding.
Company Shareholder	Natural persons who are shareholders of Koluman Holding.
Company Authorized Person	Members of the Board of Directors and other authorized natural persons of Koluman Holding.
Employees, Shareholders, and Authorized Persons of Stakeholder Institutions	Employees, shareholders, and authorized persons of institutions with which Koluman Holding maintains business relationships.

Annex 3 – Personal Data Categories

CATEGORY	DESCRIPTION
Identity Information	Name and surname, Turkish ID number, date of birth, gender, nationality, title, etc.
Contact Information	Telephone number, address, e-mail address, etc.
Transaction Security Information	Log records, IP address information, authentication data.
Transaction Information	Requests, complaints, declarations, call center records, membership information.
Family Members and Relatives Information	Information regarding family members and emergency contact persons.
Physical Premises Security	Camera recordings, vehicle entry information.
Financial Information	IBAN, bank account details, income and debt information.
Visual / Audio Information	Photographs, camera recordings, and audio recordings.
Corporate Memory Information	Interviews, memoirs, historical records.
Special Categories of Personal Data	Health data, biometric data, genetic data, etc.
Legal Transaction and Compliance Information	Data related to lawsuits, enforcement proceedings, and compliance processes.
Audit and Inspection Information	Data related to audit and inspection activities.
Request / Complaint Management Information	Application and evaluation records.

Annex 4 – Third Parties To Whom Personal Data Are Transferred

RECIPIENTS TO WHOM DATA MAY BE TRANSFERRED	PURPOSE OF TRANSFER
Business Partners	Fulfillment of business partnership purposes.
Suppliers	Provision of services.
Group Companies	Conducting group activities.
Legally Authorized Public Institutions	Fulfillment of legal obligations.
Legally Authorized Private Legal Entities	Fulfillment of legal claims.



Compliance Programme

