ANKAREF INNOVATION AND TECHNOLOGY JOINT STOCK COMPANY

PRIVACY AND DATA POLICY REGARDING THE PERSONAL DATA PROCESSING AND PROTECTION

ID OF THE DATA CONTROLLER

Ankaref Innovation and Technology Inc. as (the "Company"), attaches importance to the security and privacy of your personal data , and in this respect, we hereby submit the following matters to your information as "Data Controller" within the scope of the The Law on the Protection of Personal Data No. 6698 ("KVKK") regarding your personal data we request from you in order to fulfill the clarification obligation arising from Article 10 of the Law .

WHICH PERSONAL DATA WILL BE PROCESSED

Your personal data is processed verbally, in writing or electronically by means of automated or nonautomated methods, such as call center, website, social media, e-mail. Due to your interest in or use of our company's services and products, your personal data (not limited to those listed below) that you have provided to us and/or can be updated can be processed:

- Your name, surname, date of birth and other data on your identity,
- Your contact data such as your phone number, e-mail address, home address,
- If you use our websites, your behavior and digital trace information we obtain through cookies,
- If you visit our company, your identity and contact information, images via closed circuit camera recording,
- Your visual and audio data that we have acquired within the framework of promotion, advertisement, campaign, social responsibility projects, organizations,
- If you are a business partner of our company, your financial data such as bank account number, IBAN, billing information in order to execute the contracts,
- Certificate of activity acquired within the performance of the contract, professional chamber registration etc. Signature circular and professional signature, if required, and signature,
- If you are an employee of our Company or if you work with an employer in partnership with our Company; your training data, your service flow within the framework of your business relationship, your data on your disposition and performance; your health data; your data on private health insurance and financing; Your Social Security Institution data; TR ID Nimber, your visa/passport data; your vehicle and any other personal data that may be processed within the scope of your service contract, but not limited to,

THE PURPOSE FOR PROCESSING THE PERSONAL DATA

Your personal data are being gathered and processed for;, the realization of the commercial activities carried out by our Company and the management and execution of business processes related to this, the relations with business partners and/or suppliers, the technical management of the websites of our Company, the management of customer and complaints, the product surveys and the questions

you send to our Company, carrying out the necessary works to benefit you from the products and services offered by our business units, planning and executing the sales, marketing, after-sales processes of the products and/or services, informing about the content of our products and services, managing customer satisfaction, customer complaints and requests, Customer relations, sending commercial electronic messages by obtaining approval in accordance with the legal regulations, Competition, event, course, workshop within our company and other organizations and execution, conducting legal and commercial relations with our Company and people who have a business relationship with our Company, ensuring the security of these relations, administrative operations for the communication carried out by our Company, employee management and organization, ensuring the physical safety and control of the locations of the company, logistics activities planning, following up of the contract procedures and/or legal claims, planning and executing the Human Resources and recruitment procedures, follow-up and realization of the training and educational activities, planning and/or carrying out the occupational health and/or safety procedures, executing the research and development activities, ensuring the Company to benefit from the incentives, planning and carrying out the corporate communication and corporate management activities, carrying out the information safety management services, following and auditing the finance and/or accounting operations, carrying out activities devoted to the financial risks of the customers, determining and carrying out the trade and business strategies of the Company, keeping and tracking the records of the visitors, throughout the objectives to be notified to the related persons during gathering the information and for fulfilling the legal obligations required by the relevant legislations, within the scope of the conditions and purposes of personal data processing stipulated in Articles 5 and 6 of the KVKK limited to the aforementioned purposes.

WITH WHOM AND FOR WHAT PURPOSE THAT PERSONAL DATA CAN BE TRANSFERRED

The personal data gathered, within the framework of the personal data processing conditions and purposes set out in Articles 8 and 9 of the Law, for the purposes included in this Visitor Clarification Text, can be shared with official institutions and organizations in Turkey, law enforcement, courts and enforcement offices, third-party natural and legal persons, service providers and officials, business partners, shareholders of our Company, suppliers and support service providers, domestic people and institutions that we receive the data storage in cloud environment. Your personal data is not transferred abroad.

PERSONAL DATA COLLECTION METHOD AND LEGAL GROUNDS

Application forms, employment contracts, contracts, resumes, electronic tracking and physical access control systems in the workplace (eg biometric and card access systems, CCTV), information systems and electronic devices (eg telecommunications infrastructure, computers and telephones), İŞKUR and private employment agencies (including Kariyer.net, etc.), parties providing Headhunter service, third parties (eg KKB and Findeks), online website Cookies created by our own site, Tracking Cookies created by third parties (ex: Hotjar) is collected via oral, written or electronic means through site usage measurement systems and other documents declared by the person concerned.

Your personal data obtained by the above mentioned methods are processed within the framework of the personal data processing conditions specified in Articles 5 and 6 of KVKK and in accordance with the basic principles of the law of protection of personal data.

HOW DO WE SAVE YOUR PERSONAL DATA?

Your personal data shared with our company are stored on our company's secure servers in accordance with the relevant legal regulations, KVKK provisions and Company policies.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

In accordance with KVKK, when the purpose that needs to be processed according to Article 7/1 of the KVKK has disappeared and/or when the timeout period has become obligatory for us to process your data in accordance with the legislation, your personal data will be deleted, destroyed or anonymized by us.

OUR MEASURES FOR THE SECURITY OF YOUR PERSONAL DATA

Our company takes the technical and administrative measures regarding technological possibilities possible in order to prevent the illegal processing of your personal data and to provide the level of security necessary to keep your personal data safe.

PERSONAL DATA OWNER RIGHTS

In accordance with Article 11 of the KVKK, everyone concerned about himself/herself have the following ritghts by applying to the data controller;

- a) Learn whether or not your personal data have been processed,
- b) Request information concerning the processing if your personal data have been processed,
- c) Learn the purpose for the processing of your personal data and whether your personal data have been used in accordance with the purpose,
- d) ç) to know the third parties to whom your personal data is transferred at home or abroad,
- e) Requesting the rectification of the data in the event they are processed incompletely or inaccurately,
- f) To request his personal data to be erased or destroyed under the conditions laid down in the Article
- g) To request notification of the operations carried out in compliance with subparagraphs (d) and (e) to third parties to whom his personal data has been transferred,
- h) Object to occurrence of any result deriving from a decision based solely on automated processing and that is to your detriment,
- i) In case the personal data is damaged due to unlawful processing, requesting the compensation for the loss ,

HOW CAN YOU USE YOUR RIGHTS?

You can submit your applications regarding your rights listed above to the Data Controller by filling out the Application Form, which you can access <u>here</u>.

Pursuant to the Communiqué on the Procedures and Principles of Application to the Data Controller, the name, surname, signature if the application is written, the Turkish identity number (passport number if the applicant is foreigner), the address or place of residence of the notification, e-mail address, phone number and fax number, if any, and the subject of the request are mandatory.

The Person concerned should clearly and evidently state what is requested in the application, which includes explanations regarding the right to do and requests to use the rights mentioned above. Information and documents related to the application must be attached to the application.

Although the subject of the request must be related to the applicant's person, if acting on behalf of someone else, the applicant must have a special authority in this regard and this authority must be documented (special power of attorney). In addition, the application must contain identification and address information and authenticating documents must be attached to the application.

The requests made by unauthorized third parties on behalf of someone else will not be considered.

WHEN WILL YOUR DEMANDS BE ANSWERED?

Your claims regarding your personal data are evaluated and answered within 30 days at the latest after they reach us. However, if the transaction requires a separate cost, the fee determined by our Company by the Personal Data Protection Board will be charged.

In case of negative evaluation of your application, the rejection reasons are sent to the address you specified in the application, via e-mail or postal way, in the form <u>Application Form</u> selected.

Contact Information of theData Protection Officer:

Data Controller Contact Information:

Ankaref Innovation and Technology Inc.

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