



stadia
engineering

**PERSONAL DATA
PROTECTION AND
PROCESSING
POLICY**

1. Introduction

1.1. Purpose and scope of the policy

Personal Data Protection Act No. 6698 (the “**Law**”) entered into force on April 7, 2016. This Stadia Engineering Policy regarding the Processing and Protection of Personal Data (the “**Policy**”) is developed by STADIA Mühendislik Müşavirlik Ltd.Şti (the “**Company**”) in order to ensure that the Company complies with the Law and establishes the principles that the Company must follow in fulfilling its obligations to protect and process personal data.

The Policy sets out the conditions for the processing of personal data and sets out the basic principles adopted by the Company in the processing of personal data. Therefore, the Policy applies to all actions of the Company to process personal data in accordance with the Law, to the owners of all personal data that the Company processes, and to all personal data that it processes.

Issues related to the processing of personal data of employees of the Company do not fall under the scope of this Policy, but are regulated separately by the Policy of Processing and Protecting Personal Data of employees of Stadia Engineering.

1.2. Entry into force and revisions

The Policy was published by the Company on its website and presented to the public. If the provisions contained in this Policy contradict the current legislation, especially the Law, the provisions of the legislation shall apply.

The Company reserves the right to make changes to the Policy in accordance with regulations.

2. Data owners, data processing purposes and data categories for personal data processing operations carried out by our company

2.1. Data Owners

The Data Owners covered by the Policy are all individuals, except employees of the Company, whose personal data is processed by the Company. In this structure, the categories of data owners generally look like this:

No	Categories of data owners	Description
1	Employee candidate	Individuals applying for a job by sending a resume to the company or by other means
2	Employee's family	Family members of the company's employees
3	Customer (Client)	The customer, the administration or a private legal entity of the customer, its officials and employees
4	Intern	Employees who are interning in the company in accordance with legal norms.
5	Employee of the supplier/subcontractor	Employees of companies where the company receives products or services

PREPARED BY: QUALITY MANAGEMENT SYSTEM MANAGER	APPROVED BY: GENERAL MANAGER
ALMA YILDIRIM	KORAY BAŞAR

No	Categories of data owners	Description
6	The official of the employee of the supplier /subcontractor	Officials of companies where the Company receives products or services
7	An official of a business partner	Officials of the partner (a legal entity or the partner himself as an individual)
8	Employee of a business partner	Employees of the partner (legal entity)
9	Third party	Persons and enterprises that are not data owners or data controllers
10	Shareholder	Shareholders and (or) partners of the Company (individuals)
11	Visitor	Third parties who entered the company building
12	All	Individuals involved

The categories of data owners are indicated for the purposes of general information exchange. The fact that the data owner does not fall into any of these categories does not negate the qualification of the data owner, as provided by Law.

2.2. Purposes of personal data processing

The Company may process your personal data and restricted personal data for the following purposes in accordance with the terms of personal data processing contained in the Law and relevant legislation:

- Implementation of emergency management processes
- Implementation of information security processes
- Conducting application and recruitment processes for candidates and interns
- Conducting audit activities
- Conducting educational activities
- Performing access rights
- Implementation of measures in accordance with the legislation
- Conducting financial and accounting activities
- Ensuring the physical security of premises
- Tracking and management of legal cases
- Planning of personnel management processes
- Conducting and supervising business activities
- Carrying out occupational health and safety measures
- Implementation of business continuity measures
- Conducting storage and archiving activities

PREPARED BY: QUALITY MANAGEMENT SYSTEM MANAGER	APPROVED BY: GENERAL MANAGER
ALMA YILDIRIM	KORAY BAŞAR

- Social responsibility and implementation of civil society activities
- Execution of contractual processes
- Carrying out strategic planning activities
- Ensuring the security of movable property and resources
- Ensuring the security of the operations of the personal data controller
- Implementation of investment processes
- Providing information to authorized persons, institutions and organizations
- Management activities

2.3. Categories of personal data

The Company processes personal data classified into the following categories in accordance with the terms of personal data processing set out in the Law and relevant legislation:

Categorization of personal data	Description
Personal information	A person's identity card (first name, last name, names of father and mother, mother's maiden name, date of birth, place of birth, marital status, serial number of the identity card, vehicle identification number) contained in documents such as a driver's license, ID card, place of residence, passport
Contact information	Information for contacting the data owner: phone number, address, e-mail address
Personal file	Personal data that are fundamental to the formation of personal rights of employees (any information and documents that, by law and in accordance with workplace policy, must be included in a personal file), salary information, employment records, resume information, etc.
Information about the client's activities	Information about the relevant person obtained and produced as a result of our business activities and operations conducted by our business units.
Security of the physical space	Surveillance camera footage taken at the entrance and while people were in the room.
Information about transaction security	Your personal data is processed to ensure our technical, administrative, legal and commercial security when conducting business activities
Financial information	Processed personal data, bank account information related to information, documents and records showing any financial results created in accordance with the type of legal relationship that the company has established with the data owner
Information about professional experience	Data on previous professional experience
Health Information	All types of medical information

PREPARED BY: QUALITY MANAGEMENT SYSTEM MANAGER	APPROVED BY: GENERAL MANAGER
ALMA YILDIRIM	KORAY BAŞAR

Categorization of personal data	Description
Video and audio recordings	Any visual and audio recordings related to the owners of our employees' personal data (for example, photos, camera recordings, audio recordings, etc.)
Criminal record information and security measures	Information about the criminal record of our employees
Sensitive personal data	Data on people's race, ethnicity, political views, philosophical beliefs, religion, denominations or other beliefs, their appearance and clothing, membership in associations, foundations or trade unions, health, sexual life, criminal record and security measures, as well as their biometric and genetic data are sensitive personal data.
Family members and loved ones	Information about family members and relatives of the personal data owner, processed in order to protect the legitimate interests of the company and the data owner
Information about incidents	Information and documentation related to accidents in which employees were injured
Legal procedures, accounting Human resources	Salary information, disciplinary investigations, employment records, resume information, performance assessment reports, bank account information, insurance, employment verification and dismissal.

3. Principles and conditions of personal data processing

3.1. Principles of personal data processing

The Company processes personal data in accordance with the principles of personal data processing set out in Section 4 of the Law. These principles are mandatory for compliance with each personal data processing operation.

- **Processing of personal data in accordance with the law and the rules of good faith**

When processing your personal data, the Company acts in accordance with the laws, secondary rules and general principles of law when processing your personal data. The Company attaches great importance to the processing of personal data, limiting it to the purpose of its processing and taking into account the reasonable expectations of data owners.

- **Accuracy and relevance of personal data**

The Company is attentive to checking the relevance of your personal data processed by the Company. In this context, data owners are given the right to request correction or deletion of inaccurate and outdated data.

- **Processing of personal data for specific, explicit and legitimate purposes**

The Company determines the purposes of data processing before each personal data processing operation and ensures that these purposes do not contradict the law.

- **Personal data must be linked, limited and measured for the purpose for which it is processed;**

PREPARED BY: QUALITY MANAGEMENT SYSTEM MANAGER	APPROVED BY: GENERAL MANAGER
ALMA YILDIRIM	KORAY BAŞAR

The Company's data processing activities are limited to personal data necessary to achieve the purpose of collection. Necessary steps are taken to prevent the processing of personal data unrelated to this purpose.

Storage of personal data for the period required by law or for the purposes of processing

Personal data is deleted, destroyed or anonymized by the Company after the termination of the purpose of processing personal data or after the expiration of the period established by law.

3.2. Terms of personal data processing

The Company processes your personal data in accordance with section 5 of the Law. The data is processed in the presence of at least one of the conditions for the processing of personal data contained in article 2018 of the Law on Personal Data. Below are explanations of these conditions:

- **In the presence of the explicit consent of the personal data owner**, in the absence of other data processing conditions, 3.1. In accordance with the general principles set out in the section, the Company may process the personal data of the data owner at its discretion, having sufficient knowledge of the data owner's personal data processing activities, without any hesitation and only if he or she gives limited consent to this transaction.
- **If personal data processing activities are clearly provided for by law**, the Company may process personal data without the explicit consent of the data owner. In this case, the Company will process personal data within the framework of the relevant legal regulation.
- **If the explicit consent of the data owner cannot be obtained due to the actual impossibility, and the processing of personal data is mandatory**, personal data belonging to the data owner, whose consent cannot be disclosed by the Company or whose consent cannot be recognized as valid, will be processed if the processing of personal data is mandatory to protect the life or bodily integrity of the data owner or a third party.
- **If the personal data processing activity is directly related to the conclusion or execution of the contract, the personal data processing activity will be carried out if the processing of personal data belonging to the parties to the contract established or already signed** between the data owner and the Company is necessary.
- **If the activity of processing personal data is mandatory to fulfill the legal obligations of the personal data controller**, the Company processes personal data in order to fulfill its legal obligations provided for by applicable law.
- **If the data owner has made his personal data public**, personal data that has been made public in any way by the data owner and that has been made publicly available as a result of disclosure may be processed by the Company for the purpose of disclosure without the explicit consent of the data owners.
- **If the processing of personal data is mandatory for the establishment, use or protection of a right**, the Company may process the personal data of the data owner without the explicit consent of the data owner in accordance with such an obligation.
- **Personal data may be processed by the Company provided that the balance of interests of the Company and the data owner is respected** if data processing is mandatory for the legitimate interests of the personal data controller, provided that the fundamental rights and

PREPARED BY: QUALITY MANAGEMENT SYSTEM MANAGER	APPROVED BY: GENERAL MANAGER
ALMA YILDIRIM	KORAY BAŞAR

freedoms of the data owner are respected. In this context, when processing data based on a legitimate interest, the Company primarily determines the legitimate interest that results from such data processing.

The Company evaluates the possible impact of personal data processing on the rights and freedoms of the data owner and performs processing if it believes that the balance has not been violated.

3.3. Conditions for processing sensitive personal data

Article 6 of the Law. The article "Sensitive personal data" indicates that the number of such data is limited. This includes data on race, ethnicity, political views, philosophical beliefs, religion, denominations or other beliefs, appearance and clothing, membership in associations, foundations or trade unions, health, sexual life, criminal record and security measures, as well as biometric and genetic data.

The Company may process Restricted Personal Data, ensuring that additional measures are taken as determined by the Personal Data Protection Council in the following cases:

- **The processing of Sensitive personal data, except for data on health and sexual life**, can be carried out if the data owner gives explicit consent or if this is expressly provided for by law.
- **Personal data related to health and sexual life** may be processed by persons or authorized bodies and organizations required to maintain confidentiality, without the explicit consent of the data owner, only for the purpose of protecting public health, preventive medicine, medical diagnosis, treatment and care, planning and management of medical services and their financing.

4. Obligations to store personal data and ensure data security

In accordance with Article 12 of the Law, the personal data controller is obliged to take all necessary technical and administrative measures to prevent illegal processing, illegal access and ensure the protection of personal data. In cases where there is more than one data controller, these obligations apply to both parties and must be fulfilled jointly. These measures include technical measures such as encryption, access control, firewalls and regular security checks aimed at preventing unauthorized access, loss, damage or unauthorized changes during data storage, as well as administrative measures such as data protection policies, training programs and internal audits. The storage of personal data will be carried out in accordance with certain principles within the framework of the Law. The data must be accurate and up-to-date, processed for specific, clear and legitimate purposes and stored for a period of time provided for by relevant legislation or necessary for the purposes for which they are processed, depending on the purpose for which they are processed, in limited and moderate quantities.

Personal data controllers and data processors may not disclose the received personal data to anyone else in violation of the provisions of the Law and may not use it for purposes other than processing purposes. This obligation remains after they leave office. In case of transfer of personal data to another personal data controller, measures to ensure the security of personal data are determined jointly between the personal data controllers.

PREPARED BY: QUALITY MANAGEMENT SYSTEM MANAGER	APPROVED BY: GENERAL MANAGER
ALMA YILDIRIM	KORAY BAŞAR

The Company may store and process employee-owned data on paper, electronically, using electronic tools and in virtual environments. The Company takes administrative, technical and legal measures to ensure the safe storage of data belonging to employees and is responsible for the receipt of data by third parties. Personal data of employees shall be processed automatically or non-automatically in accordance with the law and for legitimate purposes. Personal data is stored for the entire period of the business relationship and for the periods required by legal obligations.

5. Transfer of personal data

In accordance with the additional provisions specified in articles 8 and 9 of the Law and determined by the Personal Data Protection Council, subject to the conditions for the transfer of personal data, the Company may transfer personal data within the country or abroad.

- **Transfer of personal data to third parties within the country;** Articles 5 and 6, as well as section 3 of this Policy: your personal data may be transferred by the Company if there is at least one of the data processing conditions described in the Data Processing section and subject to compliance with the basic principles regarding data processing conditions.
- **Transfer of personal data to third parties abroad:** In cases where a person does not have explicit consent, if at least one of the data processing conditions specified in Articles 5 and 6 of the Law and explained in Section 3 of this Policy is present, and subject to compliance with the basic principles regarding data processing conditions, the Company may transfer your personal data data abroad.

If the country to which the transfer is made is not one of the countries recognized as safe by the Personal Data Protection Council, after the Company and the personal data controller in the relevant country undertake in writing to ensure adequate protection, the Personal Data Protection Council authorizes the transfer of data to third parties in such a country if there is at least one from the data processing conditions specified in Articles 5 and 6 of the Law (see section 3 of this Policy).

Subject to the general principles of Articles 8 and 9 of the Law and the data processing conditions specified therein, the Company may transfer data to the parties that have been classified in the following table:

Categorization of the parties to whom the data is transmitted	Includes:
Authorized state bodies and organizations	Government agencies and organizations authorized by law to receive information and documents from the Company
Individuals or legal entities of private law	Individuals or private legal entities Shareholders Subsidiaries and branches Suppliers Customers (Clients) Banks

PREPARED BY: QUALITY MANAGEMENT SYSTEM MANAGER	APPROVED BY: GENERAL MANAGER
ALMA YILDIRIM	KORAY BAŞAR

Categorization of the parties to whom the data is transmitted	Includes:
	Employees of the HR department working in the company, employees of the information technology department, officials engaged in accounting

The Company transfers data for the following purposes and for the following legal reasons:

Purposes

- Implementation of measures in accordance with the legislation
- Conducting financial and accounting activities
- Planning of personnel management processes
- Conducting / supervising business activities
- Implementation of business continuity measures
- Performing customer relationship management processes
- Execution of contractual processes
- Providing information to authorized persons, institutions and organizations

Legal reasons

- The presence of the explicit consent of the data owner
- Establishment and execution of the contract
- The implementation of personal data processing activities is mandatory for the fulfillment of the legal obligations of the personal data controller responsible for data processing
- Mandatory processing of personal data for the establishment, use or protection of the right
- Data processing is mandatory for the legitimate interests of the personal data controller that it does not prejudice the fundamental rights and freedoms of the data owner.

6. Informing data owners and the rights of data owners

In accordance with Article 10 of the Law, data owners must be informed about the processing of their personal data before or no later than during the processing of personal data. In accordance with the relevant article, the Company, being the data controller, has created the necessary internal structure to ensure that data owners are informed in all cases when the Company processes personal data.

PREPARED BY: QUALITY MANAGEMENT SYSTEM MANAGER	APPROVED BY: GENERAL MANAGER
ALMA YILDIRIM	KORAY BAŞAR

- Purposes of processing your personal data: see section 2.2 of the Policy.
- The parties to whom your personal data is transferred and the transfer of data: see section 5 of the Policy.
- The conditions for processing your personal data, which may be collected through various channels, whether physical or electronic media: see Section 4 of the Policy.
- According to Article 11 of the Law, you, as the data owner, have the following rights:
 - To know if your personal data has been processed;
 - If your personal data has been processed, request information about it;
 - Know for what purpose your personal data is being processed and whether it is being used for its intended purpose;
 - To know about third parties to whom your personal data has been transferred within the country or abroad;
 - Request correction of personal data in case of incomplete or incorrect processing, request notification of third parties to whom your personal data has been transferred about such procedures;
 - To request the deletion or destruction of personal data in case of elimination of the reasons for their processing, despite the fact that they were processed in accordance with the Law and other relevant provisions of the Law, and to request notification of third parties to whom personal data was transferred about such procedures;
 - Object if, as a result of the analysis of the processed data exclusively with the help of automatic systems, an unfavorable result is obtained for you
 - To claim damages if the damage occurred as a result of illegal processing of your personal data.

Applications regarding the above rights should be sent to kvkk@stadia.com.tr. Depending on the nature of the request, applications are processed free of charge as soon as possible and no later than within thirty days. However, if additional costs are required for processing, you may be charged according to the tariff set by the Personal Data Protection Council.

During the review of applications, the company first determines whether the person who submitted the application is the actual beneficiary. However, if necessary, the Company can request detailed and additional information to better understand the request.

The company's responses to the data owners' requests are communicated to the data owners in writing or electronically. If the request is rejected, the reasons for the refusal will be explained to the data owner in a reasonable manner.

If the personal data is not received directly from the data owner, the Company takes measures to inform the data owners: (1) within a reasonable period of time after receiving the personal data, (2) during the first communication if the personal data will be used for communication purposes with the data owners (3) no later than the first moment of transmission if the personal data is subject to transfer

7. Deletion, destruction or anonymization of personal data

PREPARED BY: QUALITY MANAGEMENT SYSTEM MANAGER	APPROVED BY: GENERAL MANAGER
ALMA YILDIRIM	KORAY BAŞAR

Despite the fact that personal data was processed in accordance with Article 7 of the Law, when eliminating the reasons for processing, the Company deletes, destroys or anonymizes personal data by virtue of its official authority or at the request of the data owner in accordance with the instructions published by the institution.

8. Restrictions on the scope and enforcement of the law

The following cases are outside the scope of the Law:

- The processing of personal data by individuals is carried out entirely within the framework of activities related to them or their family members living in the same dwelling, provided that personal data is not transferred to third parties and data security obligations are respected
- Processing of personal data by anonymizing it with the help of official statistics for purposes such as research, planning and statistics
- Processing of personal data for artistic, historical, literary or scientific purposes or within the framework of freedom of expression, provided that it does not violate or constitute a crime against national defense, national security, public safety, public order, economic security, privacy or personal rights
- The processing of personal data is carried out within the framework of preventive, protective and intelligence measures carried out by state bodies and organizations authorized by law to ensure national defense, national security, public safety, public order or economic security.
- Processing of personal data by judicial authorities or executive authorities in connection with an investigation, prosecution, trial or execution.

In the cases listed below, the Company is not obliged to provide information to the data owners, and the data owners cannot exercise their rights set out in the Law, except for their right to damages:

- The processing of personal data is necessary to prevent the commission of crimes or to investigate crimes
- Processing of personal data made public by the person concerned
- The processing of personal data is necessary for the performance of audit or regulatory duties, as well as disciplinary investigations or prosecutions by government agencies and organizations, as well as professional organizations that are government agencies, based on the powers granted by Law.
- The processing of personal data is necessary to protect the economic and financial interests of the State in relation to budgetary, tax and financial issues.

9. Related documents

- FR-38_ Non-Disclosure Agreement and Personal Data Protection Act

PREPARED BY: QUALITY MANAGEMENT SYSTEM MANAGER	APPROVED BY: GENERAL MANAGER
ALMA YILDIRIM	KORAY BAŞAR

Annex 1- Definitions

DEFINITIONS	DESCRIPTION
Personal data	Any information belonging to a specific or identifiable individual.
Sensitive personal data	Information about race, ethnicity, political views, philosophical beliefs, religion, confessions or other beliefs of people, their appearance and clothing, membership in associations, foundations, or trade unions, health, sexual life, criminal records and security measures, as well as their biometric and genetic data.
Personal health information	Any medical information related to a specific or identifiable individual.
Data owner/ Person concerned	An individual whose personal data is subject to processing
Employee	Real persons who are employees or interns of the company and work under fixed-term/indefinite, full-time/part-time employment contracts and other contracts
Employee candidate	Individuals who are not employees of the Company, but somehow have the status of a candidate for the company's staff.
Processing of personal data	Any operation performed with data by fully or partially automatic or non-automatic means, provided that they are part of any data registration system: receipt, recording, storage, preservation, modification, reordering, disclosure, transfer, assignment, provision, classification or prevention of use.
Explicit consent	Agreement on a specific issue, based on information and expressed in good faith
Data controller	An individual or a legal person who defines the purposes and means of processing personal data, responsible for the creation and administration of a data registration system
Data Processor	An individual and a legal entity processing personal data on his behalf on the basis of the powers granted by the personal data administrator
Inventory of personal data processing processes	The Company's actions for processing personal data carried out by data controllers depending on their

PREPARED BY: QUALITY MANAGEMENT SYSTEM MANAGER	APPROVED BY: GENERAL MANAGER
ALMA YILDIRIM	KORAY BAŞAR

DEFINITIONS	DESCRIPTION
Personal data	Any information belonging to a specific or identifiable individual.
	business processes; an inventory that they create by linking personal data with the purposes of processing personal data, the category of data transmitted by a group of recipients and a group of data subjects, as well as indicating the maximum period required for the purposes of processing personal data, personal data provided for to be transferred to foreign countries and measures taken to ensure data security.
Personal health information	Any medical information related to a specific or identifiable individual.
Personal Data Protection Act	Personal Data Protection Act No. 6698 of March 24, 2016
The Constitution	Constitution of the Republic of Turkey No. 2709
PDP Council	Personal Data Protection Council
PDP authority	Personal Data Protection Authority
Business partners	Persons with whom the Company cooperates within the framework of contractual relations in the field of its commercial activities.
Company	STADİA Mühendislik Müşavirlik Ltd.Şti

PREPARED BY:
QUALITY MANAGEMENT SYSTEM MANAGER

ALMA YILDIRIM

APPROVED BY:
GENERAL MANAGER

KORAY BAŞAR