



TUNÇTAŞ CAM SANAYİİ VE TİCARET A.Ş.

PERSONAL DATA PROTECTION AND PROCESSING POLICY

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SECTION 1 - GENERAL

Our Company's Personal Data Protection and Processing Policy (the "**Policy**") sets out the principles and fundamental rules adopted in carrying out the personal data processing activities performed by our Company in compliance with the provisions of the Law on the Protection of Personal Data No. 6698 (the "**Law**").

Scope: This Policy covers the personal data of all natural persons, such as our Company's employees, former employees, job applicants, customers, suppliers, business partners, shareholders and visitors. Such data may be processed by automated or non-automated means and may form part of a data recording system.

Entry into Force and Currency of the Policy: This Policy entered into force on 01.10.2018. It was updated on 10/02/2026.

This Policy has been made available for information and access on the website of **Tunçtaş Cam Sanayii ve Ticaret AŞ** at <https://tunctas.com.tr/>.

SECTION 2 - MATTERS RELATING TO THE PROCESSING OF PERSONAL DATA

Personal Data: Personal data means any information relating to an identified or identifiable natural person. In this context, personal data includes not only information that enables the definitive identification of an individual, such as their name, surname, date of birth and place of birth, but also information relating to the person's physical, family, economic, social and other characteristics. A person being identified or identifiable means that the person is made identifiable by associating the available data with a natural person in any way.

Special Categories of Personal Data: Certain personal data has been given special importance under the Law and defined as “special categories of personal data” due to the risk of causing victimization or discrimination if processed unlawfully. Such data consists of data relating to 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 convictions and security measures, as well as biometric and genetic data.

The following principles must be complied with in the processing of personal data:

- **Processing in Compliance with the Law and the Principle of Good Faith**

Our Company acts in accordance with the general principles of trust and good faith in the processing of personal data and carries out lawful processing activities.

- **Ensuring that Personal Data Is Accurate and, Where Necessary, Up to Date**

Our Company takes the necessary measures to ensure that personal data is accurate and up to date throughout the period in which it is processed.

- **Processing for Specified, Explicit and Legitimate Purposes**

Our Company clearly sets out the purposes for which personal data is processed, processes such data within the scope of legitimate purposes connected with its business activities, and clearly informs data subjects through privacy notices.

- **Being Relevant, Limited and Proportionate to the Purposes of Processing**

Our Company processes personal data only to the extent required by its business activities, in a manner that is limited, relevant and proportionate to the specified purposes.

- **Retention for the Period Stipulated in the Relevant Legislation or Required for the Purpose of Processing**

Our Company determines whether a retention period for personal data is stipulated in the relevant legislation and, if such a period has been set, acts in accordance with it. If there is no statutory period, personal data is retained for a reasonable period necessary for the purpose for which it is processed. At the end of the periods so determined, personal data is destroyed using the destruction methods (erasure and/or destruction and/or anonymization) set out in the Retention and Destruction Policy.

Conditions for Processing Personal Data: Personal data may be processed with the explicit consent of the data subject, and may also be processed without explicit consent where one or more of the conditions set out below exist. The explicit consent of the data subject must relate to a specific matter, be based on information and be expressed with free will. Where any of the personal data processing conditions set out below exist, personal data may be processed without the need for the data subject's explicit consent.

- **Explicit Provision by Law:** This processing condition applies where the processing of the data subject's personal data is expressly provided for by law.

- **Inability to Obtain the Data Subject's Explicit Consent Due to Actual Impossibility:** The personal data of the data subject may be processed where processing is necessary to protect the life or physical integrity of a person who is unable to express consent due to actual impossibility or whose consent is not legally valid, or of another person.

- **Being Directly Related to the Establishment or Performance of a Contract:** This condition is deemed fulfilled where the processing of personal data is necessary, provided that it is directly related to the establishment or performance of a contract to which the data subject is a party.

- **Fulfilment of the Company's Legal Obligation:** The personal data of the data subject may be processed where processing is mandatory for our Company to fulfil its legal obligations.

- **Personal Data Made Public by the Data Subject:** Where the data subject has made their personal data public, such personal data may be processed limited to the purpose of making it public.

- **Processing Being Mandatory for the Establishment, Exercise or Protection of a Right:** The personal data of the data subject may be processed where data processing is mandatory for the establishment, exercise or protection of a right.
- **Processing Being Mandatory for the Legitimate Interests of Our Company:** The personal data of the data subject may be processed where processing is mandatory for the legitimate interests of our Company, provided that it does not harm the fundamental rights and freedoms of the data subject.

Processing of Special Categories of Personal Data: Special categories of personal data are processed by our Company where the following conditions set out in Article 6 of the Law exist.

- The explicit consent of the data subject,
- Explicit provision by law,
- Processing being mandatory to protect the life or physical integrity of a person who is unable to express consent due to actual impossibility or whose consent is not legally valid, or of another person,
- Processing relating to personal data made public by the data subject and in line with their intention to make it public,
- Processing being mandatory for the establishment, exercise or protection of a right,
- Processing being necessary, by persons under an obligation of confidentiality or by authorized institutions and organizations, for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning, management and financing of healthcare services,
- Processing being mandatory for the fulfilment of legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance,
- Processing concerning current or former members and affiliates of foundations, associations and other non-profit organizations or bodies established for political, philosophical, religious or trade union purposes, or persons in regular contact with such organizations and bodies, provided that it complies with the legislation to which they are subject and their purposes, is limited to their fields of activity and is not disclosed to third parties,

Transfer of Personal Data: In line with lawful personal data processing purposes, our Company may transfer the personal data and special categories of personal data of data subjects to third parties (third persons and public and private authorities) by taking the necessary security measures. In this respect, our Company acts in accordance with the provisions of Article 8 of the Law.

Conditions for the Transfer of Personal Data: Even without the explicit consent of the data subject, personal data may be transferred to third parties, with all necessary security measures being taken, where one or more of the conditions set out below exist.

- o The transfer of personal data is expressly provided for by law,
- o The transfer of personal data is directly related to and necessary for the establishment or performance of a contract,
- o The transfer of personal data is mandatory for our Company to fulfil its legal obligation,
- o The personal data has been made public by the data subject (limited to the purpose of making it public),
- o The transfer of personal data by the Company is mandatory for the establishment, exercise or protection of the rights of the Company, the data subject or third parties,
- o The transfer of personal data is mandatory for the legitimate interests of the Company, provided that it does not harm the fundamental rights and freedoms of the data subject,

- o The transfer is mandatory to protect the life or physical integrity of a person who is unable to express consent due to actual impossibility or whose consent is not legally valid, or of another person.

Furthermore, pursuant to Article 9 of the Law and the Regulation on the Procedures and Principles for the Transfer of Personal Data Abroad, personal data may be transferred abroad where one of the conditions set out in Articles 5 and 6 of the Law is met and an adequacy decision exists regarding the country, sectors or international organizations to which the transfer is to be made. In the absence of an adequacy decision, personal data may be transferred abroad by ensuring one of the appropriate safeguards set out in paragraph 4 of Article 9 of the Law, provided that one of the conditions set out in Articles 5 and 6 of the Law exists and that the data subject is able to exercise their rights and seek effective legal remedies in the country to which the transfer is made.

The appropriate safeguards set out in paragraph 4 of Article 9 of the Law are as follows:

- The existence of an agreement, not constituting an international treaty, between public institutions or international organizations abroad and public institutions or professional organizations having the status of public institutions in Türkiye, and authorization of the transfer by the Board.
- Compliance by companies within a group of undertakings engaged in joint economic activity with binding corporate rules that contain provisions on the protection of personal data and are approved by the Board.
- The existence of a standard contract published by the Board, covering matters such as data categories, purposes of transfer, recipients and groups of recipients, technical and administrative measures to be taken, and additional measures to be taken for special categories of personal data.
- The existence of a written undertaking providing adequate protection, and authorization of the transfer by the Board.

Since the servers of the Microsoft applications used within our Company are located abroad, personal data is transferred abroad by providing appropriate safeguards and taking the necessary technical and administrative measures.

Parties to Whom Data Is Transferred: In order to ensure the conduct of commercial and operational activities, personal data is transferred, within the conditions set out above, to affiliates and group companies; to suppliers, customers and business partners with whom we have commercial relations; to legally authorized public institutions and organizations; and to legally authorized private persons and organizations.

Our Company has certain obligations under the Law to ensure the effective protection of personal data. The main obligations can be listed as follows:

- Obligation to inform and, where necessary, to obtain explicit consent
- Obligations regarding data security
- Obligation to register with VERBİS and to create an inventory
- Obligation to respond to applications made by data subjects
- Obligation to comply with Board decisions
- Obligation to establish a data retention and destruction policy

SECTION 3 – PERSONAL DATA PROCESSED

The categories of personal data processed within our Company are as follows:

- Identity (name and surname, mother's and father's names, date of birth, place of birth, T.R. identity number, etc.)
- Contact (address, e-mail address, contact address, telephone number, etc.)
- Location (location information of where the person is)
- Personnel File (payroll information, disciplinary investigations, employment entry and exit records, CV information, performance evaluation reports, etc.)
- Legal Transaction (information in correspondence with judicial authorities, information in case files, etc.)
- Customer Transaction (invoice, promissory note and cheque information, order information, request information, etc.)
- Physical Space Security (entry and exit records of employees and visitors, camera recordings, etc.)
- Transaction Security (IP address information, password and passcode information, etc.)
- Risk Management (information processed to manage commercial, technical and administrative risks, etc.)
- Finance (balance sheet information, financial performance information, credit and risk information, etc.)
- Professional Experience (diploma information, courses attended, in-service training information, certificates, transcript information, etc.)
- Visual and Audio Recordings (visual and audio recordings, etc.)
- Trade Union Membership (trade union membership information, etc.)
- Health Information (information on disability status, blood type information, personal health information, etc.)
- Criminal Convictions and Security Measures (information on criminal convictions, information on security measures, etc.)
- Family Members and Relatives Information

The groups of persons whose personal data is held within our Company are as follows:

- Job Applicant
- Employee
- Shareholder/Partner
- Potential Product or Service Buyer
- Supplier Employee
- Supplier Representative
- Product or Service Recipient
- Visitor
- Subcontractor

SECTION 4 – RIGHTS OF DATA SUBJECTS AND THE EXERCISE OF THESE RIGHTS

A data subject is defined as the natural person whose personal data is processed. The data subject has the following rights against our Company:

- To learn whether personal data is being processed
- To request information if personal data has been processed
- To learn the purpose of the processing of personal data and whether such data is used in accordance with its purpose

- To know the third parties to whom personal data is transferred, domestically or abroad
- To request the rectification of personal data if it has been processed incompletely or inaccurately, and to request that this action be notified to the third parties to whom the personal data has been transferred
- To request the erasure or destruction of personal data if the reasons requiring its processing no longer exist, and to request that this action be notified to the third parties to whom the personal data has been transferred
- To object to any outcome to their detriment arising from the analysis of the processed data exclusively through automated systems
- To claim compensation for damages if they suffer loss due to the unlawful processing of personal data

Exercise of Rights by Data Subjects: Data subjects may submit their requests regarding their rights through the methods specified in the Application Form available on our Company's website.

Our Company's Response to Applications: Where the data subject submits their request regarding their rights to our Company in accordance with the procedure, our Company will conclude the request free of charge as soon as possible and within 30 (thirty) days at the latest, depending on the nature of the request. However, if the action requires an additional cost, a fee may be charged in accordance with the tariff to be determined by the Personal Data Protection Board.

SECTION 5 – SPECIAL CIRCUMSTANCES IN WHICH PERSONAL DATA IS PROCESSED

Detailed studies have been carried out across all departments of our Company to determine which categories of personal data are processed, for which purposes, on which legal grounds and within the scope of which processes. As a result of these studies, the areas of responsibility of the relevant units have been clarified, the necessary administrative and technical security measures have been identified and implemented, and all legal obligations arising from the personal data protection legislation have been identified on a departmental basis and structured into applicable procedures.

In addition to the personal data processing activities carried out within the Company, there are also certain personal data processing activities specific to visitors. First of all, our Company monitors its buildings and facilities with a closed-circuit camera system for security purposes. Data subjects are informed about the camera monitoring activity through privacy notices. Only a limited number of Company employees have access to camera footage and to the recordings stored in digital form.

For security purposes, our Company carries out personal data processing activities to track visitor entries and exits at its buildings and facilities. While information such as the names and surnames of persons visiting our Company's buildings is obtained, these persons are informed through notices that are posted or otherwise made available to guests.

In addition, the complete and timely fulfilment of the obligation to inform regarding the personal data processed in the Human Resources department as well as in all other operational and support units of the Company, the assessment of data processing activities according to their legal grounds and the conduct of explicit consent processes where necessary, the establishment of safeguards compliant with the legislation for the transfer of personal data, and the continuous updating and implementation of technical and administrative measures for data security have become an integral part of the Company's corporate culture.

In this context, practices such as raising awareness among all employees, clarifying the responsibilities of process owners, regularly reviewing policies and procedures, and operating internal audit and control mechanisms also form the basis of a sustainable compliance structure.

The Company embraces full compliance with personal data protection legislation not merely as an obligation, but as an indispensable element of its corporate reputation, ethical management approach and trust-based working culture.

SECTION 6 – PROTECTION OF PERSONAL DATA

- **Establishment of Policies:** Through the policies and procedures it has established in accordance with the personal data protection legislation, our Company has made the protection of personal data part of its corporate compliance. In addition, data subjects are informed through privacy notices in personal data processing processes. For the processing of personal data in the Human Resources department, data subject groups are distinguished and compliance activities are carried out for each of them. Policies and procedures are reviewed and updated at regular intervals.
- **Organizational Structure and Responsibilities:** A Personal Data Protection Committee responsible for personal data security has been established within our Company. Personal data processing activities have been clarified for all departments and a personal data inventory has been prepared. In addition, an authorized position has been created within our Group's organizational structure so that employees can be given the support they may need in practice.
- **Training and Awareness Activities:** All our employees receive training on the protection of personal data, the obligations under the Law and company policies. In addition, regular awareness activities are carried out to keep employees attentive.
- **Personal Data Security Measures:** In accordance with Article 12 of the Law, our Company takes the necessary administrative and technical measures, in line with the guidelines published by the Authority, to prevent the unlawful processing of and access to personal data, to ensure the safekeeping of personal data and to provide an appropriate level of security for this purpose. These measures are continuously updated in line with the Authority's guidelines. Unauthorized persons are prevented from entering areas where personal data is kept; visitor records are maintained within the Company and controls such as security cameras are applied. Physical files are kept in locked cabinets, and the "*clean desk policy*" and "*screen privacy*" principles have been adopted within our Company. In addition, access rights in our information systems are defined on a role basis, and each employee can access only the minimum data necessary to perform their job.
- **Retention and Destruction:** Retention periods, and the destruction processes to be carried out in compliance with them, have been determined for each category of data processed within the Company. A Retention and Destruction Policy has been prepared for the management of this process.
- **Breach Management and Application Processes:** A "Data Breach Response Plan" has been established to be put into action in the event of a suspected personal data breach. In addition, data subjects can submit their applications and rights requests to our Company as specified in the Application Form available on our website.
- **Audit, Monitoring and Continuous Improvement:** Personal data processing activities and the measures taken are checked regularly. In this context, changes in legislation, guidelines and Board decisions are monitored, and company policies and processes are updated when necessary.