

**NUROL TEKNOLOJİ SANAYİ VE MADENCİLİK
TİCARET A.Ş.
PERSONAL DATA PROTECTION AND
PROCESSING POLICY**

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1. SECTION 1-INTRODUCTION

1.1. INTROUCTION

The protection of personal data is one of the most critical priorities of Nurol Teknoloji Sanayi ve Madencilik Ticaret Anonim Şirketi (“company”), and our company makes the utmost efforts to comply with all applicable legislation in this respect. Nurol Teknoloji Sanayi ve Madencilik Ticaret Anonim Şirketi Personal Data Protection and Processing Policy (“Policy”) constitutes the most important pillar of this issue.

This policy of personal data processing activities performed by our company within the framework of the adopted policies and in the conduct of the company's data processing activities of personal data protection law No. 6698 (“law”) taken in terms of regulatory compliance describes the basic principles, and thus our company provides the necessary transparency in informing the owners of personal data. With full awareness of our responsibility to this extent, your personal data is processed and protected under this policy.

1.2. SCOPE

This policy relates to all personal data of persons other than employees of our Company that is processed by automatic or non-automatic means, provided that they are part of any data recording system.

Detailed information about such personal data holders can be accessed from Annex-1 (“**Annex 1 - Personal Data Holders**”) of this policy.

Our company's activities regarding the protection of our employees' personal data are managed under the Nurol Group employees' personal data protection, and Processing Policy, which is written in parallel with the principles set out in this policy.

2. SECTION 2 – PROCESSING OF PERSONAL DATA

2.1 Processing Of Personal Data In Accordance With The Principles In The Legislation

2.1.1. Processing in Accordance With The Law And The Good Faith Rule

Personal data is processed in accordance with the general rule of trust and good faith so as not to harm the fundamental rights and freedoms of persons. In this context, personal data is processed to the extent and limited to the extent required by our company's business activities.

2.1.2. Keeping Personal Data Accurate and Up to Date

Our company takes the necessary measures to ensure that the personal data is accurate and up-to-date during the time it is processed and sets up the mechanisms required to ensure the accuracy and up-to-date of the personal data for specific periods.

2.1.3. Processing for Specific, Open and Legitimate Purposes

Our company sets out the purposes for which personal data is processed and also operates within the scope of the related activities in line with its business activities.

2.1.4. Being Connected, Limited, and Restrained with the Processed Purpose

Our company collects personal data only in the nature and extent required by its business activities and processes it for limited purposes.

2.1.5. Preservation Up To The Time Provided For in The Relevant Legislation Or Sufficient For The Committed Purpose

Our company maintains personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the relevant legislation. In this context, our company first determines whether a period is specified for the storage of personal data in the applicable law, and if a period is determined, it acts under this period. If a statutory period is not available, personal data is stored for the period required for the purpose for which it is processed. Personal data dispose at the end of the specified retention periods in accordance with the annual disposal periods or the application of the data owner and by the determined methods of disposing of (deletion and/or damage and/or anonymization).

2.2 TERMS OF PROCESSING OF PERSONAL DATA

The express consent of the owner of the personal data is only one of the legal bases that makes it possible to process the personal data in accordance with the law, and in the case of one of the conditions listed below, the personal data is processed by our company without seeking the express consent of the owner of the data.

The basis of personal data processing activity, except for express consent, maybe only one of the following conditions, and more than one condition may be the basis of the same personal data processing activity. If the processed data is of exceptional quality personal data, the terms contained in title 2.3 of this policy ("**Processing Of Special Quality Personal Data**") shall apply.

2.2.1 Clearly Stipulated In The Law

If there is an explicit provision in the law regarding the processing of personal data, the personal data may be processed by our company within the framework stipulated in the legislation.

2.2.2 Failure To Obtain The Express Consent Of The Relevant Person Due To Actual Impossibility

The personal data may be processed if it is necessary to process the personal data of the person who is unable to disclose his/her consent due to actual impossibility or whose consent cannot be granted validity to protect the life or physical integrity of the person or another person.

2.2.3 Having A Direct Interest In The Establishment or Execution Of The Contract

This condition may be deemed fulfilled if the processing of personal data is necessary, provided that it is directly related to the establishment or execution of a contract to the data holder.

2.2.4 Fulfilling The Legal Obligation Of The Company

The personal data of the data holder may be processed if it is necessary to process the data for our company to meet its legal obligations.

2.2.5 Personal Data Publicization Of The Owner

If the data holder has publicly disclosed his/her personal data, the relevant personal data may be processed for publicization purposes only.

2.2.6 If Data Processing Had Obligatory To Establish Or Protect A Right

If the data processing obligatory for the establishment, use, or protection of a right, the holder's personal data may be processed.

2.2.7 If Data Processing is Mandatory For The Legitimate Interest Of Our Company

The holder's personal data may be processed if it is necessary to process the data for the legitimate interests of our company, provided that it does not harm the fundamental rights and freedoms of the personal data holder.

2.3 Processing Of Private Personal Data

Particular attention has been given to personal data that are sensitive under the law because of the risk of victimization or discrimination of persons when processed unlawfully. This "private" personal information is; such as race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, costume and dress, association or trade union membership, health, sexual life, criminal convictions and security measures with biometric data and genetic data.

Private personal data are qualified by our company, under the principles in this policy and by taking all necessary administrative, and technical measures, including methods to be determined by the board and, are processed in the presence of the following terms:

- (i) Private personal data other than health and sexual life** may be processed without the express consent of the data holder if there is a clear provision in the law relating to the processing of personal data, provided that it is clearly stipulated in the law. Otherwise, the express consent of the data holder will be obtained.
- (ii) Private personal data relating to health and sexual life**, the protection of public health, preventive medicine, medical diagnosis, treatment and care services, health services and financing planning and management of the persons, under the obligation of secrecy or by authorized institutions and organizations can be processed without explicit consent. Otherwise, the express consent of the data owner will be obtained.

2.4 Categories Of Processed Personal Data And Processing Purposes

The personal data categories and detailed information about these categories processed by our company under the purposes and conditions set out in this policy in accordance with the law and other relevant legislation can be accessed from Annex-2 ("**Personal Data categories**") of this policy.

Purposes of our company's personal data processing are as follows under the terms of the processing of personal data and qualified personal data detailed in this policy, by the law and other relevant legislation:

1. Planning and/or execution of our company's human resources policies and processes,
2. Planning and/or execution of legal and technical security of our company and related persons in a business relationship with our company,
3. Planning and/or execution of the activities necessary to propose and introduce the products and services offered by our company and/or to our company's name and account to the relevant persons by customizing them according to their liking, usage habits, and needs,

4. Şirketimiz tarafından ve/veya Şirketimiz nam ve hesabına sunulan ürün ve/veya hizmetlerden ilgili kişileri faydalandırmak için gerekli çalışmaların yapılması ve ilgili iş süreçlerinin yürütülmesi,
5. To benefit the relevant persons from the products and/or services offered by our company and/or to our company's name and account, the necessary works are carried out and the related business processes are carried out,
6. Planning and/or execution of our company's commercial and/or business strategies.

Detailed information on these personal data processing purposes can be found in ANNEX-3 (***ANNEX 3- Personal Data Processing Purposes***) document of this Policy.

3. SECTION 3 – ISSUES RELATING TO THE TRANSFER OF PERSONAL DATA

Our company can transfer the personal data of the personal data owner and private personal data to third parties by taking the necessary security measures by the lawful personal data processing purposes. Our Company acts under regulations stipulated in Article 8 and 9 of the Law. Detailed information on this subject can be found in Annex 4 of this Policy (***ANNEX 4- Third Parties to whom Personal Data is Transmitted by Our Company and the Purpose of Transfer***).

3.1 Transferring of Personal Data

If one or more of the following conditions exist, the personal data may be transferred to third parties by taking all security measures including the methods prescribed by the board, even without the express consent of the personal data holder.

- The relevant activities relating to the transferring of personal data are stipulated in the law,
- The transferring of personal data by the company is directly related to the establishment or execution of a contract and is necessary,
- The transferring of personal data is mandatory for our company to fulfill its legal obligation,
- The transferring of personal data by our company in a limited manner for publicization purposes, provided that it has been publicly disclosed by the data holder,
- The transferring of personal data by the company is mandatory for the establishment, use or protection of the rights of the company or the data holder or third parties,
- It is mandatory to carry out personal data transfer activities for the legitimate interests of the company, provided that it does not harm the fundamental rights and freedoms of the data holder,
- The obligation of the person who is unable to disclose his consent due to actual impossibility or whose consent is not granted legal validity to protect his or anyone else's life or physical integrity.

In addition to the conditions above, if the personal data is transferred abroad, it is transferred to foreign countries announced by the board which has adequate protection(***Foreign Country That Has Adequate Protection***); or in the absence of adequate protection in Turkey and in foreign countries that is undertaken in writing the permission of the board responsible for adequate protection and data resides are exported to the foreign countries (***Foreign Country That are Committed to Adequate Protection, Which is Responsible For Data***).

3.2 Transferring Of Private Personal Data

Private personal data are qualified by our company, in accordance with the principles in this policy and by taking all necessary administrative and technical measures, including methods to be determined by the board and may be transferred in the presence of the following terms:

- (i) Private personal data other than health and sexual life may be transmitted without the explicit consent of the data owner if there is an explicit provision in the law, in other words, in the relevant law, there is a clear provision for the processing of personal data. Otherwise, the express consent of the data owner will be obtained.
- (ii) Private personal data relating to health and sexual life, public health protection, preventive medicine, medical diagnosis, treatment and care in the execution of services, to finance the planning and management of health services, or authorized persons under confidentiality obligation by the institutions may be transferred without requiring explicit consent. Otherwise, the express permission of the data holder will be obtained.

If private personal data is to be transferred abroad, in addition to the above conditions, personal data are transferred to Foreign Countries with Adequate Protection or to the Foreign Countries in which the Data Responsible for Adequate Protection is located.

4. SECTION 4 –DISCLOSURE OF PERSONAL DATA HOLDER

In accordance with Article 10 of the Law and the secondary legislation, our Company provides the personal data owners with whom, as the data responsible, for which purposes they are processed, for which purposes they are shared, by which methods they are collected, and the legal reasons and rights of the data owners within the scope of their personal data processing.

5. SECTION 5- STORAGE AND DISPOSAL OF PERSONAL DATA

Our company maintains personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the relevant legislation. In this context, our company first determines whether a period is stipulated for the storage of personal data in the relevant law, and if a period is determined, it acts in accordance with this period. If a statutory period does not exist, personal data is stored for the required period for which is processed. Personal data is destroyed at the end of the specified retention periods by the periodical disposal periods or the application of the data owner and by the determined methods of disposal (deletion and/or destruction and/or anonymization).

6. SECTION 6- ISSUES RELATED TO THE PROTECTION OF PERSONAL DATA

Under Law Article 12, our company takes the necessary measures to prevent unlawful disclosure, access, transfer, or other security deficiencies of personal data by the nature of the data to be protected. In this context, our company takes administrative measures, audits, or conducts the following guidelines published by the Personal Data Protection Board (“**Board**”) to provide the necessary level of security.

In this context, technical and administrative measures taken by our company for the protection of personal data are carefully implemented in terms of private personal data, and necessary audits are provided within our company.

6.1 Increasing The Awareness And Supervision Of Business Units About The Protection And Processing Of Personal Data

Our company provides training to business units to raise awareness about the illegal processing of personal data, preventing unlawful access to data, and ensuring the protection of data.

Our company sets up systems to raise awareness about the protection of personal data of existing employees and new employees and works with consultants if needed. Accordingly, our company evaluates participation in the related training, seminars, and information sessions and organizes new training in parallel with the update of the relevant legislation.

7. SECTION 7 – THE RIGHTS OF THE PERSONAL DATA HOLDERS AND THE EXERCISE OF THESE RIGHTS

7.1 PERSONAL DATA HOLDER'S RIGHTS

Holders of personal data have the following rights:

- 1) Learning whether personal data is processed,
- 2) Request information about personal data if it has been processed,
- 3) Learning the purpose of personal data processing and whether they are used in accordance with their purpose,
- 4) To know the third parties from which personal data is transferred at home or abroad,
- 5) To request their correction and to inform the third parties to whom the personal data is transferred if the personal data is incomplete or incorrectly processed.
- 6) Although it has been processed under the provisions of the Law and other relevant laws, to request the deletion or destruction of the personal data in case the reasons that require it are eliminated and to notify the third parties to whom the personal data has been transferred,
- 7) To object to the occurrence of a result against the person by analyzing the processed data exclusively through automated systems,
- 8) To claim damages if personal data is damaged due to illegal processing.

7.2 EXERCISING THE RIGHTS OF THE PERSONAL DATA HOLDERS

The personal data holders will be able to submit their requests for the rights listed in section 7.1 (“rights of the owner of personal data”) to our company by means determined by the board. In this respect; www.nurolinsaat.com.tr, they will be able to use the “Data Holder Application Form” which can be reached at the address.

7.3 TO RESPOND OF COMPANY APPLICATIONS

Our company takes the necessary administrative and technical measures to finalize the applications to be made by the owner of personal data under the law and secondary legislation.

In the event that the personal data holder duly submits his request for the rights contained in Section 7.1 (“**Personal Data Holder's Rights**”) to our company, our company will conclude the request free of charge as soon as possible and within 30 (thirty) days at the latest, according to the nature of the request. However, if the transaction requires a further cost, it may be charged by the tariff set by the board.

ANNEX-1 PERSONAL DATA HOLDERS

CATEGORY OF PERSONAL DATA HOLDERS	DESCRIPTION
Employee/Trainee Candidate :	A real person who has applied for a job to our company or has opened his resume and related information to our company's review.
Ex-Employee :	The employment contract between the company and the company for any reason (dismissal, dismissal, retirement, etc.) is the real person who has come to an end.
Customer :	Real persons and real person shareholders, employees and officials of legal persons who are using, using or applying for the products and services offered by our company and whose application is in the evaluation stage.
Potential Customer :	Real persons and real person shareholders, employees and officials of legal persons who have not used our products and services but has requested or been interested in using them or have been evaluated in accordance with the rules of business practice and honesty with which they may have this interest.
Event Participant :	A real person who participates in the activities, organizations and similar activities organized by our company.
Owners of opinions/complaints/suggestions and Information requests :	A real person who delivers opinions/complaints/suggestions or information and other requests to our company, whether or not he has benefited from our company's products and services.
Visitor :	A real person who visits our company's sites, websites, or joins our company's guest internet network.
Data Owner Relatives :	Family members and relatives of people who benefit from our company's products and/or services and/or our employees.
Supplier Employee/Official/Shareholder :	A real person who is the shareholders, officials or employees of the companies that provide goods and/or services to our company based on the existing and/or future contract between the company and the company.
Partner Employee/Official/Shareholder :	Real persons who are shareholders, officials or employees of the companies in which they establish business partnerships for sales, promotion, and marketing of our company's products and services, after-sales support, and the conduct of joint customer loyalty programs while conducting commercial activities of our company.
Other 3. People :	Within the scope of this Policy, Nurol Teknoloji Sanayi ve Madencilik Ticaret A.Ş., real persons and other third parties not covered by the Protection and Processing of Employee Personal Data Policy.

ANNEX-2 PERSONAL DATA CATEGORIES

CATEGORY OF PERSONAL DATA	DESCRIPTION
Credential	: It refers to the data that contains information about the person's identity. (First Name, T.C. identification number, nationality information, mother's name-father's name, place of birth, date of birth, gender, including documents such as driver's license, ID card, and passport and tax number, etc.)
Contact Information	: Telephone number, address, e-mail, IP address, and similar contact information.
Financial Information	: Our company is established according to the type of legal relationship with the owner of the personal data indicating the result created all kinds of financial information, documents, and records in relation to processed personal data and bank account number, IBAN, credit card information, business profile, assets, data, informations such as income data.
Customer Information	: Data on customers who benefit from our engineering, procurement and sales services during the realization of our business activities.
Customer Transaction Information	: It means records of the use of our products and services and information such as our customers ' instructions and requests.
Security Process Information	: It is personal data (Log records, passwords, and passwords, etc.) that are processed to ensure our technical, administrative, legal, and commercial security while conducting our business activities.
Legal process and compliance information	: It is personal data that is processed within the scope of determination of legal receivables and rights, follow-up and performance of our debts, legal obligations and compliance with our company's policies.
Demand/Complaint Management Information	: It means personal data relating to the receipt and evaluation of any requests and/or complaints made to our company.
Audio and visual data	: Photographs are data of visual or auditory quality, such as camera/audio recordings.
Physical Location Security Information	: Personal data, such as camera records, visitor records, and documents taken during your stay in the physical space, are recorded at the entrance to the physical area.
Inspection information	: Personal data processed during internal or external audit activities within the scope of our company's legal obligations and compliance with company policies
Candidate Employee Information	: It is the personal data of employees and/or trainee candidates who have applied for a job in any way to our company, such as CVS, interview notes, etc.
Vehicle Information	: Associated with the owner of the data is the license plate etc.data relating to the vehicles.
Location Data	: It is personal data such as GPS location, travel data that determines the location of the employees of the companies in which we cooperate with our employees while using our company's vehicles.
Family members and relatives	: In order to protect the legal and other interests of our company and the data holder within the framework of operations carried out by the business units of our company, personal data is about the family members (spouse, mother, father, child) of the personal data holder, their relatives and other persons that may be reached in case of emergency.
Marketing Information	: It refers to the personal data that is processed to customize and market our products and services in line with the personal data owner's usage habits, tastes and needs, and the reports and evaluations that are generated as a result of these processing results.
Private Personal Data	: The data stated in the article 6 (health data, biometric data, religion, associations, etc.).

ANNEX-3 PERSONAL DATA PROCESSING PURPOSES

MAIN GOALS (PRIMARY)	SUB-GOALS (SECONDARY)
Planning and/or execution of our company's human resources policies and processes	Planning and/or execution of performance/ability evaluation processes of employees
	Planning and/or execution of application, selection and evaluation processes of employee candidates
	Monitoring and/or supervision of employees ' business activities
	Planning and/or execution of ancillary rights and/or benefits for employees
	Planning and/or execution of personal records of sub-employer employees, supervision and/or follow-up activities
	Planning and/or execution of necessary operational activities related to disciplinary/ethical processes
	Planning and/or execution of internal/external training activities
Planning and/or execution of legal and technical security of our company and related persons in a business relationship with our company	Planning and/or execution of necessary operational activities to ensure that the company's activities are carried out in accordance with the company's procedures and/or relevant legislation
	Planning and/or execution of activities for realization of companies and partnership law
	Follow-up of legal affairs
	Planning and/or execution of the activities of providing and recording the information or documents and requests requested from the official institutions and/or organizations
	Planning and/or execution of emergency and/or incident management processes
	Planning and/or execution of activities to launder proceeds of crime, fight against financing of terrorism, identify your client (KYC) and similar legal and commercial risks
	Ensuring the security of company operations
	Planning, auditing and/or execution of information security processes
	Creation and/or management of information technology infrastructure
	Planning and/or execution of internal/external audit, inspection, investigation and/or control activities of our company
	Follow-up of contract processes and/or legal claims
	Ensuring the security of company fixtures and/or resources
	Ensuring the security of company premises and/or facilities
	Creation and/or tracking of visitor records
The planning and/or execution of the activities necessary to propose and introduce the products and services offered by the company and/or to the company's nam and account to the relevant persons by customizing them according to their liking, usage habits and needs.	Planning and/or execution of market research activities for sales and/or marketing of products and services
	Creation and/or follow-up of application and/or sales processes for products and/or services

<p>In order to benefit the relevant persons from the products and/or services offered by our company and/or to our company's name and account, the necessary works are carried out, and the related business processes are carried out.</p>	Planning and/or execution of activities for customer satisfaction and/or experience
	Evaluation of customer requests and/or complaints collected in digital and/or other media
	Planning and/or execution of activities related to returning/renewal/repair of products
	Planning and/or execution of activities for taking security measures related to products and services
<p>To carry out the commercial and/or operational activities carried out by our company, the necessary work is carried out by our related business units, and the related business processes are carried out.</p>	Planning and/or execution of invitations and/or organizations for product/service promotion
	Follow-up of Finance and/or accounting
	Planning and/or execution of activities for the realization of efficiency/efficiency and/or place analysis of business activities
	Planning and/or execution of corporate governance activities
	Planning and/or execution of business continuity activities
	Planning and/or execution of inventory and/or shipment operations of our company products
	Planning and/or execution of purchasing processes
	Planning and/or execution of corporate communication activities
	Planning and/or execution of supply chain management processes
	Planning and/or execution of business activities
	Planning and/or execution of sponsorship activities
	Planning and/or execution of Social Responsibility and/or civil society activities
	Planning and/or execution of operations and/or efficiency processes
	Identification and/or control of the authority of our employees and persons outside the company to access information
Planning and/or execution of internal/external reporting activities	
<p>Planning and/or execution of our company's commercial and/or business strategies</p>	Planning and/or execution risk and feasibility review with regards to choosing potential business partner and/or suppliers
	Management of relationships with business partners and/or suppliers
	Making and/or performing budget studies
	Planning and/or execution of the company's financial risk processes

ANNEX- 4 THIRD PERSONS AND PURPOSES TO TRANSFERRING OF PERSONAL DATA

People Who Can Transfer Data	Description	Purpose of Data Transferring
Supplier	Within the scope of conducting commercial activities of our Company, it means the parties providing services to our Company in line with the data processing purposes and instructions of our Company.	Personal data is transferred to our company on a limited basis to ensure that the services that are outsourced by our company from the supplier and necessary for the fulfillment of our company's business activities are provided to our company.

Business Partner	It means the parties that the Company cooperates with for sales, promotion, and marketing of the Company's products and services, after-sales support, and the conduct of joint customer loyalty programs while conducting commercial activities of our Company.	To ensure the fulfillment of the objectives of the establishment of the business partnership, personal data is transferred on a limited basis.
Group Companies	Group companies which belong to Nurol Holding Anonim Şirketi. You can reach the group companies of Nurol Holding Anonim Şirketi from the list at https://www.nurol.com.tr .	Personal data is transferred to group companies directly or indirectly affiliated with Nurol Holding Anonim Şirketi by the consent of the employee candidate.
Shareholders	This means the shareholders, including Nurol Holding Anonim Şirketi, who are authorized to design the strategies and audit activities related to the commercial activities of the Company under the provisions of the relevant legislation.	According to the provisions of the relevant legislation, personal data is transferred to design strategies and auditing related to the business activities of our company.
Public institutions and organizations authorized by law	This means the public institutions and organizations authorized to receive information and documents from our Company under the relevant legislation. <ul style="list-style-type: none"> • Courts, law enforcement agencies, tax offices, etc. 	Personal data is transferred for the purpose requested by the relevant public institutions and organizations within the legal authority.
Private Institutions Authorized By Law	This means the institutions or organizations established in accordance with certain conditions determined by the law in accordance with the provisions of the relevant legislation and continuing their activities within the framework determined by the law.	Within the scope of the activities carried out by the related private institutions and organizations, personal data are shared on a limited basis and to provide the benefits and interest providing to our employees.