

 AKGİRİŞİM	PERSONAL DATA PROCESSING AND PROTECTION POLICY	Document No:	KVKK.PO.01
		Release Date:	02.12.2019
		Revision Date:	26.08.2024
		Revision No:	02

PERSONAL DATA PROCESSING AND PROTECTION POLICY

The procedures and principles adopted and implemented by our Company to ensure compliance with the **Law No. 6698 on the Protection of Personal Data ("KVKK")**, published in the Official Gazette dated **07.04.2016** and numbered **29677**, and with the relevant legislation, are set out in this Policy within the scope of the data controller's obligation to inform.

Below you will find information regarding the personal data processed by our Company; the principles applicable to personal data processing; the purposes and conditions of processing; domestic and cross-border transfers; destruction of personal data; and the practices and principles concerning your rights over the personal data processed.

Akgirişim Construction, Consultancy and Environmental Technologies Industry and Trade Inc. (hereinafter the "Company") will act in accordance with the procedures and processes defined in this Policy to ensure compliance with the KVKK and other applicable regulations, and to lawfully process, use, destroy, transfer and otherwise handle your personal data.

1. 1. DEFINITIONS

Explicit Consent: Consent that is related to a specific matter, informed, and given by free will.

Anonymization: Rendering personal data impossible to associate with an identified or identifiable natural person, even by matching with other data.

Personal Data: Any information relating to an identified or identifiable natural person.

Processing of Personal Data: Any operation performed on personal data—fully or partially by automatic means or, provided that it forms part of a data registry system, by non-automatic means—such as collection, recording, storage, retention, alteration, re-organization, disclosure, transfer, takeover, making available, classification, or preventing the use thereof.

Data Subject: The natural person whose personal data are processed.

Special Categories of Personal Data: Data relating to a person's 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 conviction and security measures, as well as biometric and genetic data.

2. 2. WHAT PERSONAL DATA DO WE PROCESS?

The categories listed below are **examples** of personal data we may process and **do not** cover every possible data category. Depending on the nature of a given activity, new processing operations may arise. In such cases, separate information notices will be prepared and shared with the relevant data subjects.

a. Customers and Prospective Customers

- Identity information (name, surname)
- Contact information (phone number, email address)

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- Financial information (payment details, payment date/time, payment method)
- Turkish ID number (if you request that it appear on the invoice)
- Personal data processed to resolve your requests and complaints
- Vehicle information (license plate, model and type)
- Information contained in the circular of signature

b. Suppliers, Business Partners' Employees and Authorized Persons

- Identity information (name, surname, Turkish ID No.)
- Contact information (phone number, email address)
- Product or Service Sales Information (sales details, date/time, payment method)
- If you request it to appear on the invoice: Turkish ID No., tax ID, sole proprietorship details
- Information contained in the circular of signature
- Information contained in subcontractor employees' personnel files

c. Job Applicants

- Identity information (name, surname, date/place of birth, Turkish ID No.)
- Contact information (address, email, phone)
- Gender information
- Education and professional information
- Information regarding references
- Information in the résumé you share with us
- Driver's license status

d. Employees

- Identity information (name, surname, date of birth, Turkish ID No., address)
- Contact information (address, email, phone)
- Personnel file information (copy of ID card, detailed population registry, certificate of residence, health report, copy of diploma, military service status, employment/service contract, SGK employment notification, criminal record, health information/documents for heavy and hazardous work, blood type card, bank passbook)
- Driver's license status
- Photograph
- CV
- Performance status, trainings received, information required by law, data processed under the employer's right of management and the law
- Records of entry/exit to the workplace
- Camera recordings at the workplace
- Other data processed under the employer's right of management during employment
- Data processed by technological devices for occupational safety purposes

e. Website and Application Visitors

- Information provided in the contact form (email, identity and contact details, etc.)
- Cookie data

f. Visitors (on premises)

- Identity information (name, surname, signature)

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- Visual data
- Physical space security data
- Vehicle information

These examples are **not exhaustive**; our Company may process data as required by the nature of the work performed.

3. 3. METHODS OF COLLECTING YOUR PERSONAL DATA

Your personal data are collected by methods compliant with the KVKK. Within the areas where our Company operates, data may be collected by automatic or non-automatic means—primarily through electronic systems, cameras, physical and electronic forms during recruitment processes, CVs, supplier companies and contracts.

4. 4. PURPOSES AND LEGAL GROUNDS FOR PROCESSING YOUR PERSONAL DATA

Your personal data may be processed—by category—for the purposes listed below in compliance with the KVKK and relevant legislation. While the main purposes are grouped by data subject categories, processing may also occur for **general purposes** beyond these.

1.1.4.1 4.1. Our Customers and Prospective Customers

Our customers are primarily legal entities; therefore, the data of their employees are processed. In general, processing takes place within the context of a contractual relationship and rests on a primary legal ground.

1.1.4.1.1 4.1.1. General Processing Purposes Concerning Customers

Your personal data are processed by our Company on the purposes and legal grounds set out below:

Purpose of Processing	Legal Ground
Verifying signatory authorities during contract procedures required by the work performed; issuing invoices (where sole proprietorships are involved and legally required data must be included)	KVKK Art. 5(2)(a) — expressly provided for by law
Processing customer employees' data for the negotiation and performance of contract processes	KVKK Art. 5(2)(c) — necessary for establishment or performance of a contract
Contacting relevant individuals for customer service; conducting business development via card distribution related to our line of business	KVKK Art. 5(2)(f) — legitimate interests of the data controller, provided fundamental rights and freedoms are not harmed
Sharing information for business line processes via cards and social media content	KVKK Art. 5(2)(d) — data made public by the data subject

1.1.4.2 4.2. Job Applicants and Employees

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During recruitment and employment management, various data are processed—at the hiring stage, during employment, and following termination. The purposes and legal grounds include:

Purpose of Processing	Legal Ground
Assessing whether you meet the qualifications for the position at application and throughout recruitment; placing successful candidates	KVKK Art. 5(2)(c) — necessary for establishment/performance of a contract
Establishing and performing employment contracts; evidencing the employment relationship; arranging travel insurance, flights/hotels, opening salary accounts, mandatory BES contributions, social security premium payments	KVKK Art. 5(2)(c) — necessary for establishment/performance of a contract
Processing personal data to fulfill legal obligations (e.g., creating/retaining personnel files) and sharing during inspections with public authorities or authorized private bodies; OHS and General Health Law trainings and mandatory notifications	KVKK Art. 5(2)(a) — expressly provided for by law
If recruitment is unsuccessful, retaining data to contact you about future opportunities; organizing fairs, seminars, trainings, conferences, trips, social events; arranging accommodation/transport; informing you of company developments; contacting you or your relatives when necessary; incentives (gifts, promotions); marketing/promotion purposes, and transfers at home/abroad for these purposes	KVKK Art. 5(1) — explicit consent
Reference checks; performance measurement; productivity improvement; ensuring workplace and employee safety (entry/exit logs, electronic monitoring); storing corporate email correspondence on cloud systems abroad	KVKK Art. 5(2)(f) — legitimate interests of the data controller
Data you have made public in your CV without being requested	KVKK Art. 5(2)(d) — data made public by the data subject
Processing special categories (e.g., health, criminal convictions) to ensure business continuity	KVKK Art. 6/2-f — necessary to fulfill legal obligations in employment, OHS, social security/services/assistance
Retaining personnel files after termination and conducting legal processes	KVKK Art. 5(2)(ç) — necessary to fulfill the data controller's legal obligation

1.1.4.3 4.3. Physical and Online Visitors

When you visit our headquarters or construction sites, your personal data are processed physically by automatic or non-automatic means; during website/app visits, data are processed electronically.

Purpose of Processing	Legal Ground
Ensuring physical space security at headquarters and facilities; monitoring construction site security through automated analysis; keeping entry/exit records	KVKK Art. 5(2)(f) — legitimate interests of the data controller

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Purpose of Processing

Legal Ground

Managing marketing processes via web tracking technologies **upon your consent**

KVKK Art. **5(1)** — explicit consent

Following up issues via the website contact form

KVKK Art. **5(2)(d)** — data made public by the data subject

1.1.4.4 4.4. Suppliers, Business Partners and Dealers

To manage our processes, we work with various suppliers, partners and dealers. In doing so, data of their officials/employees (and, where applicable, their partners) may be processed through contracts, bilateral meetings, online conferences and field representatives.

Purpose of Processing

Legal Ground

Fulfilling obligations arising from contracts with partners and suppliers

KVKK Art. **5(2)(c)** — necessary for establishment/performance of a contract

Fulfilling legal obligations stipulated in contracts between the parties

KVKK Art. **5(2)(ç)** — necessary to fulfill the data controller's legal obligation

Audits under **Akkök Holding Business and Ethics Principles**

KVKK Art. **5(2)(f)** — legitimate interests of the data controller

Establishing new partnerships at fairs/events; initiating dealership processes; business development

KVKK Art. **5(2)(d)** — data made public by the data subject

5. 5. TRANSFER OF YOUR PERSONAL DATA

Our Company may transfer personal data to third parties **in Turkey** or, where necessary and subject to the security measures prescribed by law, **abroad**—including via outsourced services—either after processing in Turkey or for processing/storage abroad. To operate efficiently and benefit from technology, we may transfer your personal data abroad through **cloud computing technologies**, taking all necessary technical and administrative measures. Other than these cases, we do **not** transfer your personal data abroad.

Pursuant to **Article 9 of the KVKK**, where one of the conditions in **Art. 5(2)** or **Art. 6(3)** exists, cross-border transfers **without explicit consent** are possible if:

a) there is **adequate protection** in the recipient country, or

b) in the absence of adequate protection, **data controllers** in Turkey and the recipient country **undertake adequate protection in writing** and obtain the **Authority's permission**.

For **regular** transfers, under **Art. 9/4(c)**, the existence of a **standard contract** announced by the Authority—covering data categories, purposes of transfer, recipients/recipient groups, technical and administrative measures, and additional safeguards for special categories—is required. For **occasional** transfers, under **Art. 9/6**, we may transfer data based on: the data subject's **explicit consent** after being informed of potential risks; necessity for the **performance of a contract** with the data subject or for pre-contractual steps at the data subject's request; necessity for the **conclusion or performance of a contract** in the data subject's interest between the controller and another person; or necessity for the **establishment, exercise or protection of a right**.

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Accordingly, in cases where explicit consent is **not** required, our Company additionally seeks the condition of **adequate protection** in the recipient country for any transfer. Adequacy is determined by the **Personal Data Protection Authority**; where adequacy is not found, both controllers (in Turkey and the recipient country) must undertake adequate protection **in writing** and obtain the Authority's **permission**.

In this context, we may share your personal data with:

- Business partners and service providers located in Turkey or abroad (e.g., database, consultancy) for IT or specialist consultancy services and support during collection processes—or abroad due to our domestic partners' servers being hosted abroad;
- Competent public institutions and judicial authorities to fulfill information/document requests and similar obligations and to exercise our legal rights (e.g., right to initiate or respond in legal proceedings);
- A domestic service provider first—then abroad under the **standard contract** recognized by the Authority—if servers for the Site and Systems are located abroad;
- Our suppliers (partners or non-partners) to perform services/products;
- Our partners for trainings and compliance; and professionals such as attorneys, certified public accountants, and OHS experts to fulfill legal obligations;
- Foreign customers, for the establishment and performance of communications and contracts;
- Akkök Holding Group Companies, our joint ventures and our foreign affiliates, where necessary.

6. 6. DESTRUCTION OF PERSONAL DATA

Personal data processed within the scope of our activities are retained for periods necessary to fulfill the purpose of processing and as required by the applicable legislation.

Data that become unnecessary, reach the end of their retention period, or are requested to be destroyed by the data subject (where permitted by law) are destroyed using one of the methods set out in **Article 7 of the KVKK: deletion, destruction, or anonymization**.

- Deletion** renders personal data inaccessible and unusable for relevant users in any way.
- Destruction** renders personal data inaccessible, non-retrievable and unusable by anyone.
- Anonymization** renders personal data impossible to associate with an identified or identifiable natural person—even by matching with other data.

7. 7. YOUR RIGHTS AS A DATA SUBJECT

Pursuant to **Article 11** of the Law, you may apply to the Company using the methods described in the **"Contact"** section of this Policy to:

- Learn whether your personal data are processed,

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- b. Request information if your data have been processed,
- c. Learn the purpose of processing and whether your data are used in accordance with that purpose,
- d. Learn the third parties to whom your data have been transferred domestically or abroad,
- e. Request correction if your personal data are incomplete or inaccurate,
- f. Request deletion or destruction of your personal data within the framework provided by the KVKK,
- g. Request notification to third parties to whom your data have been transferred regarding the actions taken under items (e) and (f),
- h. Object to results arising to your detriment from analysis of your data exclusively through automated systems,
- i. Request compensation for damages arising from unlawful processing.

You may submit your applications **in writing** or via **registered electronic mail (KEP)**, **secure electronic signature**, **mobile signature**, or by using the **email address previously notified to us and registered in our systems**. We will respond within **30 days** of receipt. To enable a prompt and accurate response, please ensure your applications are as clear, comprehensible, and date-specific as possible.

8. CONTACT

You may submit applications concerning your rights in accordance with the procedures set out in the **Communiqué on the Procedures and Principles of Application to the Data Controller**:

- **In person:** *Vişnezade Mahallesi Süleyman Seba Caddesi No:82 BEŞİKTAŞ / İSTANBUL* (please note that identification will be required),
- **By notary public:** same address,
- **By KEP with secure e-signature** under Law No. 5070: *akgirisim@hs02.kep.tr*,
- **By email** using the address previously registered in our systems: *kvkk@akgirisim.com*.

Once the Authority announces additional methods, our Company will provide further information on how applications will be received through those channels.