

AKKA GROUP PERSONAL DATA PROTECTION AND PROCESSING POLICY

1. PURPOSE AND SCOPE

In all our business within AKKA Group, utmost attention is paid to the security of personal data. With this awareness, we attach great importance to processing, saving, transferring, sharing, and keeping all kinds of personal data belonging to all individuals related to our Companies including the individuals benefiting from our products and services in compliance with the Law on the Protection of Personal Data numbered 6698 ("KVK Law"). In line with the importance attached by AKKA GROUP in protecting the personal data, the basic principles related to the compliance of the activities conducted by AKKA group with the regulations specified by "KVK Law" and AKKA GROUP KVK Policy are identified. With the implementation of AKKA GROUP KVK Policy regulations, the data protection principles adopted by AKKA GROUP shall become sustainable. AKKA GROUP KVK policy is intended for real persons, whose personal data are processed by way of automatic and non-automatic manners provided to remain as part of any data system and for AKKA GROUP employees.

2. AIM

With AKKA GROUP KVK Policy, it is aimed that the necessary systems are created in accordance with the purpose of creating awareness in processing and protecting personal data in accordance with the law within AKKA GROUP and that necessary organization is established in order to ensure the compliance with the legislation. Within this scope, AKKA GROUP KVK Policy aims to establish a guideline in terms of implementing the regulations specified by the KVK Law and relevant legislation.

3. DEFINITIONS

Significant definitions used in AKKA GROUP KVK Policy are as follows:

Express Consent	:	Consent about a specific subject based on information and expressed in free will.
Anonymization	:	Making personal data unlikely to be associated with any identifiable real person in any way even when personal data is paired with other data.
Communique on Procedures and Principles to be Followed in Fulfilling Disclosure Obligation	:	Communique on Procedures and Principles to be Followed in Fulfilling Disclosure Obligation issued in the Official Gazette dated 10 March 2018 and numbered 30356 and entered in the force.
Employee(s)	:	Employee(s) of AKKA GROUP:
Customer(s)	:	Those who benefit from services of AKKA GROUP.
Regulation on Processing Personal Health Data	:	Regulation on Processing of Personal Health Data and Ensuring Confidentiality issued in the Official Gazette dated 20 October 2016 and numbered 29863.
Personal Health Data	:	Any information related to the physical and mental health of real person, whose identity is defined or can be defined and information related to the health service provided to the individual.
Personal Data	:	Any information related to a person, whose identity is defined or can be defined.
Personal Data Owner	:	Natural persons whose personal data are processed i.e. customers, employees.
Personal Data Protection Department	:	Department to ensure necessary coordination within the Company within the scope of ensuring, maintaining and sustaining compliance with personal data protection legislation by AKKA GROUP.
Processing Personal Data	:	All kinds of processes performed on personal data including obtaining, recording, storing, keeping, changing, re-

		arranging, disclosure, transmission, acquisition, making available, classification or prevention of use in whole or in part, automatically or in non-automatic ways, being part of any data recording system.
KVK Board	:	Personal Data Protection Board
KVK Authority	:	Personal Data Protection Authority
KVK Compliance Program	:	Program related to ensuring the compliance with the legislation regarding personal data protection, implemented by AKKA GROUP.
Data of Special Nature	:	Personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership to associations, foundations or trade-unions, health, sexual life, convictions and security measures, and the biometric and genetic data are deemed to be personal data of special nature.
AKKA GROUP	:	All companies under AK-KA İNŞ. TUR. TİC. A.Ş.
AKKA GROUP Personal Data Retention and Disposal Policy	:	As per the Regulation on Removal, Destroying, and Anonymization of Personal Data, “AKKA GROUP Personal Data Retention and Disposal Policy” taken as a basis by AKKA GROUP in order to determine the maximum period required for the objective of processing personal data and deletion, destroying and anonymization of data.
AKKA GROUP Suppliers	:	Parties providing services to AKKA GROUP under a contract.
AKKA GROUP Data Owner Application Form	:	The application form for data owners to use for their applications related to the rights described in Article 11 of the Law on KVK
Data Processor	:	A real and legal person who processes personal data on his behalf on the basis of the authority conferred by the data controller.
Data Controller	:	Person determining the purposes and means of processing personal data, and managing the space where the data are systematically held.
Data Controllers' Registry	:	Data Controllers Registry, maintained under supervision of KVK Board and Personal Data Protection Authority Directorate, which can be publicly accessible.
Communique on Principles and Procedures for Application to Become Data Controller	:	Communique on Principles and Procedures for Application to Become Data Controller issued in the Official Gazette dated 10 March 2018 and numbered 30356, and entered into force.

4. ROLES AND RESPONSIBILITIES

.... is responsible for the implementation of AKKA GROUP KVK Policy in all AKKA GROUP operations, activities and processes. Moreover, KVKK and Legal Advisors shall be the source of advice and the guides in the application of the regulations, procedures, guide standard and training activities prepared in accordance with AKKA GROUP KVK Policy within AKKA GROUP. All our employees, stakeholders, guests, visitors and relevant third persons in AKKA GROUP are obliged to comply with AKKA GROUP KVK Policy as well as to cooperate with Legal Advisors in preventing legal risks and imminent danger. All organs and departments of AKKA GROUP are responsible for observing the compliance with AKKA GROUP KVK Policy.

5. PRINCIPLES OF AKKA GROUP KVK POLICY

5.1. PEOPLE GROUPS MANAGED WITH AKKA GROUP KVK POLICY

Data owners, who are within the scope of AKKA GROUP KVK Policy, and whose personal data are processed by AKKA GROUP are categorized below:

- **AKKA GROUP Employee Candidates**
Individuals, with whom service contract has not been established with AKKA GROUP but included in the evaluation of AKKA GROUP to establish a contract.
- **AKKA GROUP Business Partners Authorized Bodies, Employees**
Real person authorized bodies, shareholders, employees of businesses that have a commercial relationship with AKKA GROUP.
- **AKKA GROUP Visitors and Guests**
Guests, visitors staying at AKKA GROUP hotels or real persons who visit websites operated by AKKA GROUP.
- **Other Real Persons**
All real persons who are not included in the scope of AKKA GROUP Employees Personal Data Protection and Processing Policy.

5.2. OBJECTIVES OF PROCESSING PERSONAL DATA WITHIN THE SCOPE OF BUSINESS ACTIVITIES CONDUCTED BY AKKA GROUP

MAIN OBJECTIVES	SUB-OBJECTIVES
Identification, planning and implementation of short / mid / long term commercial policies of AKKA GROUP	<ol style="list-style-type: none"> 1. Planning and execution of training activities 2. Management of relationships with business partners and suppliers
Designing and Conduction of Human Resources Activities of AKKA GROUP	<ol style="list-style-type: none"> 1. Conduction of employee procurement processes 2. Planning and execution of intern and student procurement, placement and operation processes 3. Planning of human resources processes 4. Fulfillment of job contract and obligations arising from the legislation for the employees of the company 5. Tracing and supervising job activities of employees 6. Planning of vested benefits for the employees 7. Planning of dismissal transactions for the employee 8. Planning and tracing performance assessment processes of employees 9. Planning and execution of training activities 10. Management of relationships with business partners and suppliers 11. Wage management 12. Planning and execution of in-house orientation activities
Carrying Out Necessary Activities by the Business Departments within the Company in order to Perform the Commercial Activities Conducted by AKKA GROUP in compliance with the Legislation and Company Policies and Conduction of Activities for This Purpose	<ol style="list-style-type: none"> 1. Tracing finance and accounting works 2. Conduction of investment relationships 3. Planning and execution of corporate communication activities 4. Planning, actualization and execution of efficiency and propriety analyses of business activities 5. Activity management 6. Creation and administration of information technologies infrastructure 7. Planning, auditing and execution of information security processes 8. Planning and execution of activities to ensure business continuity 9. Planning and execution of activities to allow business partners and suppliers to access information
Providing Support for Designing, Planning and Execution of Human	<ol style="list-style-type: none"> 1. Providing support for planning human resources strategies of AKKA GROUP 2. Tracing and announcing transfer, temporary assignation, promotion and release of AKKA GROUP employees

Resources Activities of AKKA GROUP	3. Providing support for planning and conduction of employee loyalty measurement processes within AKKA GROUP 4. Providing support for employee procurement processes of AKKA GROUP
Protecting the Commercial Reputation and Customer Trust of AKKA GROUP	1. Claim and complaint management 2. Execution of activities to protect the reputation of company assets

6. PRINCIPLES ADOPTED BY AKKA GROUP REGARDING THE PROTECTION AND PROCESSING OF PERSONAL DATA

6.1. EXECUTION OF PERSONAL DATA PROCESSING ACTIVITIES IN COMPLIANCE WITH DATA PROCESSING CONDITIONS

While conducting data processing activities, AKKA GROUP acts in compliance with (i) basic principles, (ii) personal data protection conditions, and (iii) processing conditions for personal data of special nature.

6.1.1. Compliance with Basic Principles

Within the scope of ensuring and maintaining compliance with personal data protection legislation, the following basic principles are adopted by AKKA GROUP:

(1) Processing personal data in compliance with law and good faith

AKKA GROUP conducts personal data processing activities in compliance with law and good faith according to personal data protection legislation, primarily the Constitution of the Republic of Turkey. In order to allow its customers to benefit from the customized products and services at the highest service quality AKKA GROUP collects your personal data within the limits in the legislation and processes these data within the conditions and purposes specified in article 5 and 6 of the Law numbered 6698.

(2) Ensuring the accuracy and actuality of the processed personal data

While conducting the activity of processing your personal data, AKKA GROUP takes all kinds of necessary administrative and technical measures within technical possibilities in order to ensure the accuracy and actuality of your personal data. Within this scope, our company carries out the necessary activity to correct and to verify the accuracy in case the personal data of the personal data owners are not accurate.

(3) Processing personal data for specific, clear and legitimate purposes

Personal data processing activities are conducted by AKKA GROUP within the scope of pre-determined, clear and legitimate purposes. The main objective for processing personal data is to increase the quality of AKKA GROUP services.

(4) Processing personal data in connection with purposes, in limited and moderate manner

Personal data are processed by AKKA GROUP in connection with data processing conditions and to the extent these services require. Within this scope, the purpose of processing the personal data is identified before commencing the personal data processing activity; and personal data processing activities are not conducted with the assumption that it may be utilized in the future.

(5) Retaining personal data for the period required for the purpose stipulated in the legislation or for the purpose for which they were processed

AKKA GROUP retains personal data for the period stipulated in the legislation for the purpose of data processing. Accordingly, personal data are removed, destroyed or anonymized by AKKA GROUP in case the conditions requiring the processing of personal data are removed or at the expiration of the period specified in the legislation.

6.1.2. Compliance with Personal Data Processing Conditions

AKKA GROUP conducts its personal data protection activities in compliance with data processing conditions set forth in article 5 of KVK Law. Within this scope, personal data processing activities may only be executed in the presence of the personal data processing conditions specified below:

(1) Personal Data Owner's Express Consent

AKKA GROUP conducts personal data processing activities provided that the data owner consents limited to the transactions clear in a way that may not cause any hesitation for the data processing freely and with sufficient knowledge about the subject.

(2) Personal Data Processing Activity is Clearly Specified by Laws

AKKA GROUP shall be able to conduct personal data processing activities limited to the relevant legislation in case there is a clear regulation in the laws related to personal data protection activity.

(3) Failure to Receive Express Consent of Data Owner Due to Actual Impracticability Despite It is Obligatory to Process Personal Data

In cases when the personal data owner is not able to express his/her consent or the consent is not legitimized as valid, AKKA GROUP conducts personal data processing activities if processing of personal data is mandatory in order to protect the bodily integrity or life of individuals.

(4) In Case Processing of Personal Data is Directly Related to the Establishment or Performance of a Contract

In cases when it is directly related to the establishment or performance of a contract, AKKA GROUP conducts personal data processing activities if personal data of the parties of the contract is mandatory to be processed.

(5) When It is Mandatory to Conduct Personal Data Protection Activity in order for AKKA GROUP to Fulfill its Legal Obligation

Having adopted to show the necessary sensitivity in terms of compliance with the law as a Company policy, AKKA GROUP conducts personal data processing activities in order to fulfill this legal obligation in case of the presence of such obligation.

(6) When Data Owner Publicizes His/Her Personal Data

Personal data, publicized by the relevant data owner (disclosed to the public in any manner), are processed by AKKA GROUP in accordance with the purpose of publicization.

(7) When Personal Data Processing is Mandatory for the Establishment, Exercising or Protection of a Right

When personal data processing is mandatory in order to establish, exercise or protect any right, AKKA GROUP conducts personal data processing activities in parallel with this obligation.

(8) Provided That It Does Not Harm the Fundamental Rights and Freedom of Data Owner, Personal Data Processing Activities Are Necessary for Legitimate Interests of AKKA GROUP

In case personal data processing is required for legitimate interests of AKKA GROUP, data processing activities may be conducted if the fundamental rights and freedom of the data owner shall not be harmed.

6.1.3. Compliance with Conditions for Processing Personal Data of Special Nature

AKKA GROUP attaches special importance to processing personal data of special nature with a risk of discrimination when they are processed against the law. Within this scope, in processing personal data of special nature by AKKA GROUP, primarily, it is identified whether the conditions of data processing are present with a sensitive manner; and data processing activities are conducted after it is ensured that the condition of compliance with law is present.

Personal data of special nature may be processed by AKKA GROUP provided that the necessary measures are taken by KVK Board in the following conditions:

(1) Processing Personal Health Data

Personal health data may be processed by AKKA GROUP in the presence of any of the following conditions:

- for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing by individuals or authorized institutions and organizations under confidentiality obligation; or
- in the presence of express consent of the personal data owner

(2) Processing of Personal Data of Special Nature Except for Health and Sexual Life

Personal data of special nature except for health and sexual life (such as race, ethnic origin, political opinion, philosophical belief, religion, sect or other belief, clothing, membership to associations, foundations or trade-unions, health, sexual life, convictions and security measures, and the biometric and genetic data) may only be processed by AKKA GROUP with the express consent of the data owner or in cases stipulated by the legislation.

6.1.4. Compliance with Personal Data Transfer Conditions

Personal data transfers by AKKA GROUP shall be in compliance with personal data transfer conditions specified in articles 8 and 9 of KVK Law.

(1) Transfer of Personal Data Within Domestic Borders

As per article 8 of KVK Law, AKKA GROUP acts in compliance with data processing conditions in data transfer activities to be conducted within the domestic borders.

(2) Transfer of Personal Data Abroad

As per article 9 of KVK Law, AKKA GROUP may transfer data abroad in compliance with personal data protection conditions on the condition that the data controllers both in Turkey and in the relevant country guarantees a sufficient protection in writing in case sufficient protection is not provided in the relevant foreign country or it may also be transferred to countries providing sufficient protection as in the list of countries announced by KVK Board.

(3) Person Groups to Whom Personal Data Are Transferred by AKKA GROUP

In compliance with articles 8 and 9 of KVK Law, AKKA GROUP may transfer the personal data of the data owners within the scope of AKKA GROUP KVK Policy with the purposes specified below:

- (i) AKKA GROUP, limited to ensuring the conduction of commercial activities requiring the participation of Community Companies,
- (ii) Limited to ensuring the establishment and continuity of business partnership to AKKA GROUP Business Partners,
- (iii) Limited to fulfilling the commercial activities of AKKA GROUP and the activities procured from suppliers to AKKA GROUP Suppliers,
- (iv) Limited to the purposes requested by the legal authorized body of the relevant persons, to the authorized public institutions and organizations as well as authorized private legal persons,
- (v) To third persons, in compliance with personal data transfer conditions.

6.2. INFORMING PERSONAL DATA OWNERS BY AKKA GROUP

In compliance with article 10 of KVK Law and the Communiqué on the Principles and Procedures in Fulfilling the Information Obligation, AKKA GROUP conducts the necessary processes in order to ensure that the data owners are informed while collecting personal data. Within this scope, in the information texts presented to data owners by AKKA GROUP, the following details are included:

- (1) Title of our company,
- (2) For what purposes the personal data of the data owners shall be processed by AKKA GROUP,
- (3) To whom and for what purpose the processed personal data may be transferred,
- (4) Method and legal reason of collecting personal data
- (5) Rights of data owner such as;
 - a) To learn whether his/her personal data are processed or not,
 - b) To request information regarding their personal data if they are processed,
 - c) To learn the purpose of data processing and whether this data is used for intended purposes,
 - d) To know the third parties to whom his personal data is transferred at home or abroad,
 - e) To request the rectification of the incomplete or inaccurate data, if any,
 - f) To request the erasure or destruction of his personal data under the conditions stipulated in the Law,
 - g) To request notification of the operations carried out in compliance with subparagraphs (e) and (f) to third parties to whom his personal data has been transferred,
 - h) To object a consequence arising to the detriment of the person by analyzing the processed data exclusively by automatic means,
 - i) To claim compensation in case of suffering loss due to illegal processing of the personal data.

6.3. FINALIZATION OF PERSONAL DATA OWNER'S REQUESTS BY AKKA GROUP

In the event that the data owners deliver their requests regarding their personal data to our Company in writing or by way of other methods specified by KVK Board, with the capacity of data controller, AKKA GROUP shall conduct the necessary processes in order that the request is finalized within a maximum of thirty (30) days according to the nature of it as per article 13 of KVK Law. Data owners should make their requests in accordance with the procedures specified in Disclosure Text published on the web page of AKKA GROUP and also notified to the customers and employees.

Within the scope of ensuring data security, AKKA GROUP may request information from the concerned person to determine whether the personal data belongs to the applicant or not. Our company may also ask questions to the personal data owner regarding the application in order to finalize the application of the data owner in accordance with the quest.

In case the application of the data owner may obscure the rights and freedom of other persons, may require non-proportional efforts, or in case the information is already open to general public, the request may be rejected by AKKA GROUP by explaining the reason.

6.3.1. Rights of Personal Data Owners

As per article 11 of KVK Law, you may apply our company to make requests on the following subjects:

- (1) To learn whether your personal data are processed or not,
- (2) To request information regarding the personal data if they are processed,
- (3) To learn the purpose data processing and whether this data is used for intended purposes,

- (4) To learn the third parties inside and outside the country to whom the personal data are transferred,
- (5) To request correction of your personal data if it has been incompletely or incorrectly processed, and to request notification to the third parties to whom your personal data has been transferred,
- (6) To request erasure, destruction or anonymization of your personal data in case the reasons that require processing have been eliminated despite the fact that it has been processed in accordance with the KVK Law and other relevant legal provisions and to request notification to the third parties to whom your personal data has been transferred,
- (7) To object to the emergence of a result against you by analyzing your processed data exclusively through automated systems,
- (8) To claim damages if you suffer any damage due to the illegal processing of your personal data.

6.3.2. Conditions Outside the Rights of Personal Data Owners As Per Legislation

Pursuant to article 8 of KVK Law, it shall not be possible for personal data owners to claim rights in the following conditions as these are not within the scope of KVK Law:

- (1) Processing personal data within the context of artistic, historical, literary or scientific purposes or freedom of speech provided that the personal data does not breach the natural defence, national security, public security, public order, economic security and confidentiality of private life or personal rights, and does not constitute a crime.
- (2) Processing the personal data for the purposes of investigation, planning and statistics by anonymizing with official statistics.
- (3) Processing the personal data within the scope of preventive, protective and intelligence operations executed by state institutions and organizations so authorized by the law to ensure national defence, national security, public safety, public order or economic security.
- (4) Processing the personal data by judicial or enforcement authorities in relation to the investigation, proceedings, litigation or execution procedures

Personal data owners, pursuant to article 28/2 of KVK Law, may not claim their other rights, except the right to claim damage, in the following cases:

- (1) Personal data subjects, pursuant to Article 28/2 of the Law on KVK, may not claim their other rights, except the right to claim damage, in the following cases:
- (2) Processing of personal data publicized by the personal data subject.
- (3) Processing personal data being required for disciplinary investigation or prosecution and conducting supervisory or regulatory duties by the authorized state institutions and organizations and professional public organizations by the power granted by the law.
- (4) Processing personal data being required for protecting economic and financial interest of the State with regard to the budgetary, tax related and financial issues.

6.4. PERSONAL DATA CATEGORIES PROCESSED WITHIN THE SCOPE OF PERSONAL DATA PROCESSING ACTIVITIES CONDUCTED BY AKKA GROUP AND CATEGORIES OF PARTIES THESE DATA ARE SHARED

6.4.1. Personal Data Categories

Personal data categories and their descriptions processed within the scope of personal data processing activities by AKKA GROUP are as follows:

PERSONAL DATA CATEGORIES	DESCRIPTION
Identity Information	These are personal data including the information related to the person's identity; documents such as driver's license, identity card and passport including details name-surname, R.o.T. ID Number, nationality information, mother's name-father's name, place of birth, date of birth, gender information, and information such as tax number, SSI number, signature information, vehicle plate number, and so forth.
Communication Information	Personal data related to communication such as phone number, address, e-mail address, fax number, and so forth.
Location Information	Personal data identifying the location of the place where the person is located when using vehicles and devices of AKKA GROUP such as GPS location, travel data, and so forth.
Family Members and Kinship Information	Within the scope of the operations conducted by AKKA GROUP business departments, personal data related to the family members (i.e., spouse, mother, father, child) and kinship of the personal data owner in order to protect AKKA GROUP and the data owner's interests.
Physical Premises Security Information	Personal data related to the records and documents received at entry into the physical premises, and during the stay in the physical premises such as camera records, fingerprint records, and records received at the security point, and so forth.
Security Information of Activity	Personal data processed in order ensure technical, administrative, legal and commercial security of both the data owner and the company while commercial activities of AKKA GROUP are conducted.
Risk Management Information	Personal data processed in accordance with generally accepted legal, commercial and honest rules in these fields, in order to manage commercial, technical and administrative risks
Financial Information	Personal data related to information, document and records indicating all kinds of financial outcome created as a result of the legal relationship between AKKA GROUP and data owner as well as personal data such as bank account number, IBAN number, credit card information, financial profile, property ownership information, revenue information.
Candidate Employee Information	Personal data processed relating to the candidates who have applied to our AKKA GROUP in order to become an employee or are deemed as candidate employee due to the requirements of the human resources of our Company as per the customs of trade and principles of good faith.
Legal Procedure and Compliance Information	Personal data processed for the purposes of determining and following AKKA GROUP's legal receivables and rights and performance of our obligations and within the scope of compliance with the legal obligations of AKKA GROUP policies.
Supervision and Inspection Information	Personal data processed within the scope of AKKA GROUP's legal obligations and compliance with company policies.
Personal Data of Special Nature	Data specified in article 6 of KVK Law (i.e. health information including blood type, biometric data, religion and affiliated associations)
Request / Complaint Management Information	Personal data related to receiving and evaluation all kinds fo requests or complaints directed towards AKKA GROUP.
Reputation Management Information	Personal data associated with the individual and collected in order to protect the commercial reputation of AKKA GROUP (i.e., shares, social media posts and visuals related to AKKA GROUP).
Event Management Information	Information and evaluations associated with the individual and collected related to events that have the potential to influence AKKA GROUP employees and shareholders (i.e., information and evaluations collected related to manage public opinion in an accurate manner).

6.4.2. Categories of Parties with Whom Personal Data Are Shared

AKKA GROUP may transfer the personal data of the data owners within the scope of AKKA GROUP KVK Policy to the categories of persons listed below with the specified purposes in accordance with the principles of KVK Law, and especially articles 8 and 9 of the law in question:

- (i) AKKA GROUP Companies,
- (ii) AKKA GROUP Suppliers,
- (iii) AKKA GROUP Affiliates,
- (iv) AKKA GROUP Business Partners,
- (v) Authorized public institutions and organizations as well as authorized private legal persons,
- (vi) Other third persons in compliance with data transfer conditions.

The scope and possible data transfer purposes to persons to whom data is transferred are specified below.

PERSONS TO WHOM DATA MAY BE TRANSFERRED	DESCRIPTION	PURPOSE OF DATA TRANSFER
Business Partner	The parties with whom AKKA GROUP has established a business partnership for purposes such as the conduction of commercial activities.	Limited to ensure the fulfillment of the purposes of the business partnership.
Supplier	Parties providing services to AKKA GROUP based on a contract in accordance with orders and instructions of AKKA GROUP within the scope of the conduction of commercial activities of AKKA GROUP.	Limited to fulfill the commercial activities of the Company procured externally from suppliers and to ensure that necessary services are provided to the Company
Affiliates	Companies, of which AKKA GROUP is a shareholder	Limited to ensure that commercial activities requiring the participation of the company affiliates are conducted
AKKA GROUP Companies	All companies comprising AKKA GROUP	Limited to purposes such as planning the strategies related to the commercial activities of the Company and supervision or the continuation of activities
Legally Authorized Public Institutions and Organizations	Public institutions and organizations authorized to receive information and documents from the Company as per the provisions of relevant legislation	Limited to the purpose requested by the relevant public institutions and organizations within the scope of their legal authority
Legally Authorized Private Legal Persons	Private legal persons authorized to receive information and documents from the Company as per the provisions of relevant legislation	Limited to the purpose requested by the relevant legal person

6.5. ENSURING SECURITY AND CONFIDENTIALITY OF PERSONAL DATA BY AKKA GROUP

AKKA GROUP takes all kinds of necessary measures according to the nature of the data to be protected within the bounds of possibility in order to prevent the personal data to be disclosed, accessed, transferred against the law or to hinder other lack of security.

Within this scope, AKKA GROUP takes all kinds of (i) administrative, and (ii) technical measures, (iii) audit system is established within the company, and (iv) action in compliance with measures specified in KVK Law is taken in case the personal data are illegally disclosed.

(1) Administrative Measures Taken by AKKA GROUP in order to Prevent Illegal Access to Personal Data and to Ensure that Personal Data Are Processed in Compliance with the Law

- AKKA GROUP educates its employees about the legislation regarding the protection of personal data and ensures that they are aware of this subject.
- In cases when personal data are transferred, it is ensured that records indicating obligations of the parties to whom personal data are transferred to protect data in the contracts executed with the persons to whom AKKA GROUP transfers personal data.
- Personal data processing activities conducted by AKKA GROUP are examined in detail; within this scope, the steps to be taken in order to ensure compliance with personal data processing conditions specified in KVK Law are identified.
- AKKA GROUP identifies the applications necessary to ensure compliance with KVK Law and regulates these applications with internal policies.

(2) Technical Measures Taken by AKKA GROUP in order to Prevent Illegal Access to Personal Data and to Ensure that Personal Data Are Processed in Compliance with the Law

- AKKA GROUP takes technical measures to the extent allowed by technology regarding the protection of personal data, and these measures are updated and improved in parallel with technological developments.
- Specialist personnel are employed regarding technical subjects.
- Audits are regularly performed for the application of measures taken.
- Software and systems are established to ensure security.
- Authorization to access personal data processed within AKKA GROUP is limited to the employees in accordance with the specified purpose for processing.

(3) Conduction of Audit Activities Regarding the Protection of Personal Data by AKKA GROUP

Compliance of technical measures, administrative measures and applications taken within the scope of protecting and ensuring the security of personal data by AKKA GROUP to relevant legislation, policy, procedures and instructions, operation and efficiency are supervised by This supervisor may perform the relevant auditing activity by way of his/her own organization or may also get the audit done by external auditing companies. Results of audit activities performed within this scope are reported to the relevant senior managers of AKKA GROUP. It is the responsibility of the process owners to regularly monitor the actions planned related to the audit results. Process owners reports their monitoring and progress status to; and carries out the monitoring, verification tests and audits of the actions in this report. Activities to develop and improve the taken measures related to the protection of data including but not limited to the audit results are conducted by the relevant executive departments.

(4) Measures to Be Taken in Case Personal Data Are Illegally Disclosed

Within the scope of personal data processing activities conducted by AKKA GROUP, in case personal data are illegally obtained by unauthorized individuals, this condition shall be promptly notified to KVK Board and relevant data owners.

6.6. IDENTIFICATION OF DEPARTMENT TO BE RESPONSIBLE FOR THE PROTECTION AND PROCESSING OF PERSONAL DATA

The department to ensure the necessary coordination within the company in terms of ensuring the compliance with the personal data protection legislation as well as maintenance and continuation of the compliance by AKKA GROUP is This department is responsible for the conduction and improvement of the systems established in order to ensure cooperation between the departments of AKKA GROUP and that the conducted activities are in compliance with the personal data protection legislation.

7. REVIEW

This policy documents shall enter into force on the date it is approved by AKKA GROUP. Board of Directors of AKKA GROUP authorized for the amendments to be made in the Policy and how the policy shall be put into force except for the abolishment of the Policy hereby. Amendments may be made in this Policy and may be put into force with the approval of

Implementation rules to specify how the matters specified in this Policy shall be executed in connection with this Policy shall be organized in the form of a regulation.

This Policy hereby is annually reviewed; and in case of necessary amendments, it is updated with the approval of

In case of a conflict between the legislation in force regarding the protection and processing of personal data and AKKA GROUP KVK Policy, AKKA GROUP agrees that the legislation in force shall be applicable.