

POLICY OF PROTECTION AND PROCESSING OF PERSONAL INFORMATION

1. INTRODUCTION

As data controller, the protection of personal data of customers, employees and other real persons whom Ukinox Ankastre Sist. San. Tic. Ltd. Şti is in contact with has a great importance. The process and purpose managed with this Policy and other written policies within the structure of **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** for the processes of protection and processing of personal information is to process and protect personal data of our customers, potential customers, our employees, our interns, visitors, employees of organizations with which we cooperate and the employees of **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** to which we are included and third parties legally.

Within this scope, according to Law number 6698 and related legislation, necessary administrative and technical measures are taken by **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** to process and protect the personal data.

In this policy, fundamental principles which have been adopted by Ukinox Ankastre Sist. **San. Tr. Ltd.Şti** for the processing of personal data will be explained below :

- Processing of personal data within the scope of consent,
- Processing of personal data according to law and rules of honesty,
- Keep personal data updated and accurate when necessary,
- To process personal data for specified, clear and legal purposes,
- To process personal data in limits, measured and in connection with the purpose,
- To keep personal data for the period required for the purpose that they are processed or according to the related legislation,
- To illuminate and notify the personal data owners,
- To establish substructure required for personal data owners to use their rights,
- To take necessary measures to protect personal data,
- To comply with related legislation and KVK Council regulations in the implementation and determination of personal data processing purposes and conveyance to third parties,
- To regulate specific personal data processing and protection subjects distinctively.

2. THE PURPOSE OF POLICY

The main purpose of this policy is to make explanations about the systems adopted for the protection of personal data and personal data processing activity which has been conducted according to law by **Ukinox Ankastre Sist.San.Tic.Ltd.Şti**, and to provide transparency by informing our customers, employees, interns, visitors and shareholders and employees of the organizations with which we cooperate and third parties.

3. THE SCOPE OF POLICY

This policy is about all personal data of our customers, employees, interns, visitors, employees of the organizations with which we cooperate and third parties which are processed by automated methods or non-automated means, provided that they are the part of a data recording system.

4. THE ENFORCEMENT OF POLICY

This policy, issued by **Ukinox Ankastre Sist.San.Tic.Ltd.Şti**, is put into effect on This policy is published on website of **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** (www.ukinox.com) and access is provided to related parties upon the request of the owners of personal data.

5. SUBJECTS ABOUT THE PROTECTION OF PERSONAL DATA

Ukinox Ankastre Sist.San.Tic.Ltd.Şti takes necessary technical and administrative measures to provide a suitable security level to keep the personal data which it has been processing and to prevent access to the data illegally and to prevent having personal data to be processed illegally according to Article 12 of The Law on Protection of Personal Data, and within this scope has required inspections to be implemented.

5.1. Measures Taken to Provide Personal Data To Be Processed According to Law

Ukinox Ankastre Sist.San.Tic.Ltd.Şti takes technical and administrative measures according to technological facilities and application cost to provide the personal data to be processed according to provisions of law.

5.1.1 Technical Measures

Main technical measures taken by **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** to provide safe processing of personal data are as follows:

- Personal data processing activities implemented by **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** are supervised with the established technical systems.
- Technical measures are periodically reported to the concerned pursuant to its internal supervision mechanism.
- Support must be taken from **experts on the subject** about technical matters.

5.1.2 Administrative Measures

Administrative measures taken by **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** to provide legal processing of personal data are as follows:

- The employees of **Ukinox Ankastre Sist. San. Tic. Ltd. Şti** are informed and trained about the legal processing of personal data and law on the protection of personal data.
- All personal data processing activities implemented by **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** are carried out according to personal data inventory and annexes formed by analyzing all departments in detail.

- Personal data processing activities implemented by the related departments of **Ukinox Ankastrre Sist.San.Tic.Ltd.Şti** and liabilities of these activities which will be implemented to provide the compliance stated by Law on Protection of Personal Data about personal data processing conditions are connected to written policy and procedures and each department is informed about this subject and the elements which the department must consider about the activity are specified.
- The supervision and management of personal data security by the departments within **Ukinox Ankastrre Sist.San.Tic.Ltd.Şti** are organized by Information Security Committees. An awareness is created to provide legal requirements determined on the basis of service unit and administrative measures required to provide the continuity of the practice and supervision of these subjects are carried out through intracompany policy, procedures and trainings.
- Records including data safety and briefing related to personal data are put into labor contracts and related documents between the employees and **Ukinox Ankastrre Sist.San.Tic.Ltd.Şti** and additional protocols are drawn up. There have been some studies for creating the required awareness with the employees about this subject.

5.1.3 Technical and Administrative Measures to Prevent Illegal Access to Personal Data

Ukinox Ankastrre Sist.San.Tic.Ltd.Şti takes technical and administrative measures according to the class, qualification of the data, technological facilities and implementation cost to prevent the personal data to be disclosed, accessed, and transmitted by unauthorized people or through negligence and the leak of data in **Ukinox Ankastrre Sist.San.Tic.Ltd.Şti** systems or all illegal access in other forms.

5.1.4 Technical Measures

Main technical measures taken by **Ukinox Ankastrre Sist.San.Tic.Ltd.Şti** to prevent illegal access to personal data are as follows:

- New technological developments are followed and especially technical measures are taken over cyber security area and these measures are periodically updated and renewed.
- Access and authorization technical solutions are put into use within the frame of legal compliance requirements determined for each department within the structure of **Ukinox Ankastrre Sist.San.Tic.Ltd.Şti**.
- Access authorization are limited and authorizations are reviewed regularly. Access restrictions are applied to former employees and the accounts are closed.
- Technical measures taken pursuant to operation within the structure of **Ukinox Ankastrre Sist.San.Tic.Ltd.Şti** are reported to related users, and subjects carrying risk are re-evaluated and necessary technological solutions are created.
- Virus protection systems, data vulnerability securities and and software and equipment containing security walls are established.
- Support is provided in technical subjects.

5.1.5 Administrative Measures

- The employees are trained about administrative measures which will be taken to prevent illegal access to personal data.
- In each department within the structure of **Ukinox Ankastre Sist.San.Tic.Ltd.Şti**, legal compliance, processes of access to personal data and authorization within the company are applied by considering personal data processing procedures.
- The scope of personal data processing activity is explained in the contacts drawn up between the employees and **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** and commitments are included regarding the compliance to these subjects.
- Additional contract is drawn up between the people to whom personal data is conveyed and **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** containing provisions regarding the people to whom the personal data is conveyed will take necessary security measures and have their organizations comply with required security measures.

6. RIGHTS AND CLAIMS OF PERSONAL DATA OWNER

If the personal data owners submit their requests about their rights mentioned below via personal application with identification card submission in written or through registered electronic mail address (KEP), secure electronic signature, mobile signature or by using electronic mail address which was notified to **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** by the related person and is registered in the system of **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** or by using a software or application developed for the purpose of application in a way to prove their identity to **Ukinox Ankastre Sist.San.Tic.Ltd.Şti**, the company will reply to these requests according to the characteristic of the request within maximum thirty days free of charge. Detailed explanation about this subjects is made in Article 20 of this policy.

Owners of personal data will be able to request all rights stated in related provision of the law including all processing procedures, purposes and transmission information of their personal data with an application they will make according to this procedure.

7. PROTECTION OF PERSONAL DATA WITH SPECIAL QUALITIES

With the Law on Protection of Personal Data, a special importance is given to some personal data because of the risk of causing discrimination or unjust treatment of the people. These data are race, ethnic origin, political view, philosophical belief, religion, creed or other beliefs, appearance, association, foundation or union membership, health, sexual life, penal conviction and data regarding security measures, and biometric and genetic data.

Ukinox Ankastre Sist.San.Tic.Ltd.Şti acts responsibly about protection of personal data with special qualification which is processed legally and determined as "special qualification" by Law on Protection of Personal Data. Within this scope, technical and administrative measures taken by **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** for the protection of Personal Data are applied meticulously and necessary audits are provided within the structure of **Ukinox Ankastre Sist.San.Tic.Ltd.Şti**.

In this scope, health data of employees are processed due to workplace doctor service within the structure of **Ukinox Ankastre Sist.San.Tic.Ltd.Şti**, and necessary trainings are provided to personnel with the access to these personal data, and the access authority scope

and periods of these personnel are determined and audits are implemented periodically and confidentiality agreements are drawn up with these personnel. If the related personnel quits their job, their access authorization is immediately removed.

Physical files which contains personal health data of the employees are kept in areas under lock where only authorized personnel can access. No other department has access to health data of the employees except authorized personnel.

8. TRAININGS OF *Ukinox Ankastre Sist.San.Tic.Ltd.Şti* EMPLOYEES ON PROTECTION AND PROCESSING OF PERSONAL DATA

Ukinox Ankastre Sist.San.Tic.Ltd.Şti provides required trainings for its employees to increase the awareness on safeguarding personal data and prevention of illegal processing and access to personal data.

9. SUBJECTS ABOUT THE PROCESSING OF PERSONAL DATA

Ukinox Ankastre Sist.San.Tic.Ltd.Şti implements personal data processing activity legally and according to rules of honesty, and by pursuing updated, specific, clear and legal goals in connection with the purpose in a restricted and restrained way pursuant to Article 20 of Constitution and Article 4 of Law on Protection of Personal Data. *Ukinox Ankastre Sist.San.Tic.Ltd.Şti* keeps personal data as long as the purpose of processing personal data requires or the period stipulated by the law. *Ukinox Ankastre Sist.San.Tic.Ltd.Şti* processes personal information, identification information (name, surname, R.T. Identification Number, gender, age, date of birth), contact information (e-mail address, telephone number, address information, IP address), vehicle information, occupational data, visual and auditory data, education data, family members data, health data of its customers, employees, visitors, supplier company employees and third parties and these data are processed within the frame of financial/legal/commercial liabilities and fulfilling the job, the execution of contracts as well as making personal data owners to get benefit from services of *Ukinox Ankastre Sist.San.Tic.Ltd.Şti* efficiently, to develop service diversity and to provide service to its customers with the principle of "best service" and have them notified from marketing and innovations as the result of these services.

Ukinox Ankastre Sist.San.Tic.Ltd.Şti notifies data owners according to Article 10 of Law on Protection of Personal Data and requests consent of data owners when required, and processes these data based on the criteria below.

9.1. Processing According to Law and Rules of Honesty

Ukinox Ankastre Sist.San.Tic.Ltd.Şti acts according to general reliability and honesty rules with principles brought into legal regulations in processing of personal data. According to compliance to rules of honesty, while *Ukinox Ankastre Sist.San.Tic.Ltd.Şti* tries to reach its goals on data processing, it considers the benefit and reasonable expectations of related persons.

9.2. Keeping personal data updated and accurate when necessary

Keeping personal data updated and accurately is necessary for protecting the fundamental rights and freedoms of the related person for *Ukinox Ankastre Sist.San.Tic.Ltd.Şti*. *Ukinox Ankastre Sist.San.Tic.Ltd.Şti* has an active care liability in providing accurated and updated personal data when necessary. Thus, all communication channels are open for

keeping the information of related person accurate and updated by **Ukinox Ankastrre Sist.San.Tic.Ltd.Şti**.

9.3. Processing with Specific, Clear and Legitimate Purposes

Ukinox Ankastrre Sist.San.Tic.Ltd.Şti clearly and specifically determines the purpose of legitimate and legal personal data processing. **Ukinox Ankastrre Sist.San.Tic.Ltd.Şti** processes personal data in connection with and necessary for its commercial activity.

9.4. To Be Limited and Moderate, In Connection With the Purpose of Processing

Ukinox Ankastrre Sist.San.Tic.Ltd.Şti processes personal data within the scope of purposes required for implementation of its activity and related to its area of activity. Thus, **Ukinox Ankastrre Sist.San.Tic.Ltd.Şti** processes personal data in a suitable way to carry out the determined purposes and avoids to process personal data which are not needed or related to the realization of the purpose. For example, it does not implement personal data processing activity for meeting the requirements which may occur on a later date.

9.5. To keep personal data for the period required for the purpose that they are processed or according to the related legislation

Ukinox Ankastrre Sist.San.Tic.Ltd.Şti keeps personal data for the period required for the purpose that they are processed or according to the related legislation, In this scope, **Ukinox Ankastrre Sist.San.Tic.Ltd.Şti** first determines whether there is a term stated for keeping personal data in related legislation, and if such term is determined, it complies with the mentioned period, and if no term is determined, it keeps personal data for the period stated in the laws and required for the purpose or process. **Ukinox Ankastrre Sist.San.Tic.Ltd.Şti** considers personal data keeping terms, and at the end of these terms personal data is deleted, destroyed or anonymized according to its characteristic and intended use within the liabilities designated within the liabilities in the scope of Law.

10. NOTIFICATION OF PERSONAL DATA OWNER

Ukinox Ankastrre Sist.San.Tic.Ltd.Şti notifies personal data owners during the gathering of personal data according to Article 10 of Law on Protection of Personal Data. Within this scope, **Ukinox Ankastrre Sist.San.Tic.Ltd.Şti** notifies the person about the identity of data controller, their representative, if available, the fact that for which purpose the personal data will be processed, to whom and for what purpose the processed personal data will be conveyed, and the rights of the personal data owner due to method of personal data collection and legal reasons according to the qualification of personal data owner and data processing period.

11. TRANSFER OF PERSONAL DATA

Ukinox Ankastrre Sist.San.Tic.Ltd.Şti can convey personal data and specific personal data of the owner by taking necessary security measures in the direction of legal personal data processing purposes. If it is found that there is no sufficient protection or to foreign countries announced as having sufficient protection by Council of Protection of Personal Data, **Ukinox Ankastrre Sist.San.Tic.Ltd.Şti** can transfer personal data to foreign countries if they have permission of CPPD and their data controllers in Turkey and the foreign country can undertake that they have sufficient protection in foreign country in written. Reasons of transfer are explained below:

- If there is a clear regulation about the conveyance of personal data in the laws,
- Provided that it is directly related to establishment or execution of a contract, if it is necessary to transfer personal data of the contract parties,
- If personal data transfer is obligatory to have **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** perform its legal liability,
- If personal data transfer is obligatory to establish, use or protect a right,
- Provided that it does not damage fundamental rights and freedoms of personal data owner, if it is obligatory to convey personal data for legitimate benefits of **Ukinox Ankastre Sist.San.Tic.Ltd.Şti**.

12. PERSONAL DATA INVENTORY AND LIMITATION OF PERSONAL DATA

Personal data of the owners (customers, employees, visitors, third parties, interns, employees of the organization with which we cooperate) in the categories stated below are processed in **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** by notifying the related people within the scope of this Policy and by complying with the liabilities stated in Law on Protection of Personal Data and general principles stated in Law on Protection of Personal Data, including the one stated in Article 4 related to processing of personal data, based on and limited to one or more personal data processing conditions stated in Article 5 of Law on Protection of Personal Data in the direction of legitimate and legal data processing requirements of **Ukinox Ankastre Sist.San.Tic.Ltd.Şti**.

Ukinox Ankastre Sist.San.Tic.Ltd.Şti established personal data inventory according to Data Controllers Registry Regulation issued by Council of Protection of Personal Data. Data categories, the source of data, data processing purposes, data processing procedure, receiver groups to which the data is transferred and storage periods are included in this data inventory. In this scope, data categories below are included, but not limited to, in **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** personal data inventory.

PERSONAL DATA CATEGORISATION	PERSONAL DATA CATEGORISATION EXPLANATION
Communication Data	Data group used to communicate with the person (Telephone, address, e-mail, fax number, Ip address).
Identity Data	Data group containing information on the person's identity (Name, surname, R.T. ID no, mother's name, father's Name, date of Birth, place of Birth, gender, card serial no, identification card copy, tax no, ssi no, nationality data, copy/scan of marriage certificate, employee card).
Health Data	Data group containing health information of the person (blood type, medical history, check-up result, consultation report, diet form).
Vehicle Data	Data group containing the person's vehicle information (License plate no, chassis no, motor no, license information).
Location Data	Data group including location data of the person (GPS Location).
Visual/Auditory Data	Data group containing the person's visual and auditory data (Photograph, voice recording, camera recording, driver's license copy/scan, identification card copy/scan, passport copy/scan).
Transaction Security (Digital Trace Data)	Data containing digital trace resulting from processing of the person's data (Log).
Financial data	Data group containing the person's financial information (Bank account no, iban no, crd information, bank name, financial profile, mail order form, credit score).
Biometric/Genetic Data	Data group containing the biometric/genetic data of the person (fingerprint, facial recognition, genetic information).
Occupational Data	Data group containing the information about the person's occupation (information about the company he/she works in, trade association registry).
Education data	Data group containing the education information of the person (Diploma Grade, diploma copy/scan).
Property Data	Data group containing property information of the person (title deed copy/scan, ehicle license copy/scan).
Travel Data	Data group containing the information about the person's travels (flight information, flight card, tour course, miles card number, accommodation data).
Company Data (customer, supplier)	Data of private company (company address).
Race/Religion Information	Data group containing the information about the origin and belief of the person (race/religion Information).
Signature Data	Data group containing the person's signature info (original signature, e-signature, signature copy/scan).
Visa/Passport Data	Data group containing visa/passport information of the person (Visa information, passport copy/scan).
Appearance Data	Data group containing distinguishing information about the appearance of the person (appearance purchase history, distinguishable clothes that the person wears).
Penal Conviction and Security Data	Data group containing the penalties applied to the person in the past (Penal Prosecution, Criminal Record, Discipline Record).
Personnel Data	Payroll information, disciple investigation, recruitment records, records of declaration of property, resume information, performance evaluation reports etc. data.
Legal data	Information included in correspondences with judicial authorities,

	information in lawsuit file etc.
Customer Data	Invoice, bill, check information, information in booth receipts, order information, request information etc.
Physical Space Security data	Entry and exit records of employees and visitors, Camera records etc.
Risk Data	Information processed to manage commercial, technical and administrative risks.
Marketing	
Family members' data	Information on the dependants
Insurance data	Insurance policies of the person.

13. PROCESSING PURPOSE OF THE PERSONAL DATA

Ukinox Ankastrre Sist.San.Tic.Ltd.Şti processes personal data limited to the purpose and conditions stated within the requirements of processing of personal data within the Article 6, clause 3 and Article 5, clause 2 of Law on Protection of Personal Data. These purposes and requirements are as follows:

- Briefing and service promotion to customers,
- To implement studies for developing service quality and to provide better service,
- To make out an invoice in return of our services,
- To obtain service as outsourcing,
- To provide benefits of expert companies for the purpose of getting technological service and the services in the subjects not included in their area of expertise,
- Identity confirmation,
- To reply to questions and complaints,
- To take necessary technical and administrative measures within the scope of data security,
- To provide financial agreement about the product and services provided to related business partners and third parties,
- To provide necessary information in the direction of request and audits of governmental organizations, regulatory and supervisory organizations,
- To keep information related to data which must be kept secret according to related legislation,
- To provide supervision related to the consistency of information,
- To qualify customer satisfaction,
- For Employees; To create personnel file, to determine whether the employee fulfills the requirement of the job, to provide private health insurance, to create health file, to take occupational safety measures.
- To fulfill legal obligations,
- To carry out/follow financial reporting and risk management, to carry out/follow legal procedures,

- To create and follow visitor records.

14. PRESERVATION PERIOD FOR PERSONAL DATA

Ukinox Ankastre Sist.San.Tic.Ltd.Şti keeps personal data during the period stated in legislation if it is made obligatory to keep them in related laws and legislation.

If it is not made clear that how long the personal data must be kept in the related legislation, personal data is kept for the period required by the practices of **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** and customs of the sector in connection with the activity conducted by **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** and later the data is deleted, destroyed or anonymized according to related policy created by **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** in accordance with the characteristics of the data.

If the purpose of the processing of personal data has been concluded and the period determined by related legislation and **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** is expired, Personal data can only be kept for the purpose of establishing a proof in potential legal conflicts or the right connected to the personal data to be claimed or for establishing a defense. Preservation periods are determined based on period of limitation about claiming the aforementioned right and the examples in the claims directed to **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** in the same subjects even though period of limitation has expired. In this case, the personal data cannot be accessed for another purpose and access is only provided when they need to be used for related legal conflict. Again, here, personal data is deleted, destroyed or anonymized after the determined period expires.

15. THIRD PARTIES TO WHICH THE PERSONAL DATA IS TRANSFERRED AND THE PURPOSE OF TRANSFER

Ukinox Ankastre Sist.San.Tic.Ltd.Şti notifies personal data owners about the people groups to which their data is transferred according to Article 10 of Law on Protection of Personal Data.

Ukinox Ankastre Sist.San.Tic.Ltd.Şti can convey personal data of the data owners to the following shareholder categories which is managed with this Policy according to Article 8 and 9 of Law on Protection of Personal Data:

- **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** business partners,
- Banks and insurance companies

- Travel agencies
- Organizations and institutions providing health service to employees
- Hotels
- Education companies
- **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** suppliers
- Ukinox Ankastre Sist.San.Tic.Ltd.Şti company officials,
- Legally authorized governmental organizations

The scope of transfer and the purpose of data transfer are stated below:

The People Who Are Authorized to Receive the Transferred Data	Definition	The Purpose of Data Transfer
Business Partner	Ukinox Ankastre Sist.San.Tic.Ltd.Şti identifies the parties with which they have partnership for the purposes such as conducting projects, getting services while they carry out their commercial activities.	Transferred finitely for the purpose of providing the fulfillment of partnership goals.
Supplier	Identifies the parties which provide service to Ukinox Ankastre Sist.San.Tic.Ltd.Şti based on contract and according to orders and instructions of Ukinox Ankastre Sist.San.Tic.Ltd.Şti while conducting the commercial activities of Ukinox Ankastre Sist.San.Tic.Ltd.Şti .	Transferred finitely to enable the necessary services to be provided by Ukinox Ankastre Sist.San.Tic.Ltd.Şti to carry out commercial activities of Ukinox Ankastre Sist.San.Tic.Ltd.Şti outsourced by Ukinox Ankastre Sist.San.Tic.Ltd.Şti from supplier.
Authorized governmental organizations	Means governmental organizations and institutions which are authorized to get information and document from Ukinox Ankastre Sist.San.Tic.Ltd.Şti according to provisions of legislation.	Transferred limited to the purpose in cases where governmental organizations and institutions request and provide legal grounds.

16. PROCESSING OF PERSONAL DATA

16.1. Processing of Personal Data

The express consent of personal data owner is only one of the legal grounds that facilitates the personal data according to law. Except express consent, personal data can also be processed if one of the conditions stated in the law is available. The grounds for processing of personal data can only one of the requirements stated below or more than one those requirements can provide basis for the same personal data processing activity.

Processing Requirements	Scope	Example
Provision of Law	Tax Legislation, Labor Legislation, Commercial Legislation etc.	Personnel information for the employee must be recorded according to legislation.
The Execution of Contract	Labor Contract, Sales Agreement, Transport Contract, Contract of work etc.	Recording address information of company for delivery.
Actual Impossibility	The person who cannot give consent due to actual impossibility or does not have ability to distinguish.	Contact or address information of an unconscious person. Location information of a kidnapped person.
Legal Liability of Data Controller	Financial Audits, Security Legislation, Compliance to Sector Oriented Regulation.	Information share in audits specific for Banking, Energy, Capital Markets.
To Make Public	The related person makes his/her information public.	The person discloses contact information to use in case of emergencies.
To establish, Protect and Use as Right	Data obligatory to be used in procedures such as lawsuit, registration, all kinds of title deed transactions etc.	Keeping necessary information of a former employee for the period of limitation.

Legitimate Interest	Providing that it does not damage fundamental rights of the data owner, data can be processed if it is obligatory for the legitimate interest of data controller.	Data processing for the purpose of applying rewards and premiums increasing employee's loyalty.
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17. PERSONAL DATA IMPLEMENTED IN BUILDINGS AND ENTRANCES

Ukinox Ankastre Sist.San.Tic.Ltd.Şti implements personal data processing activity for tracking of guest entries and exits with surveillance activity through security cameras in buildings of **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** to provide security.

Ukinox Ankastre Sist.San.Tic.Ltd.Şti carries out personal data processing activity via using security cameras and recording guest entries and exits.

Ukinox Ankastre Sist.San.Tic.Ltd.Şti has a purpose of protecting the interests of company and other people for providing security within the scope of surveillance activity through security camera. This surveillance activity is carried out according to Law on Protection of Personal Data and Law on Private Security Services and related legislation. Within this scope, the information of camera surveillance is provided to all employees and visitors and the people are notified about it. Notification documents are posted in the entrances of surveillance areas. **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** takes necessary technical and administrative measures to provide security of personal data obtained as the result of surveillance through camera according to Article 12 of Law on Protection of Personal Data.

17.1. Tracking of Guest Entry and Exits Conducted in Service Building Entrances

Ukinox Ankastre Sist.San.Tic.Ltd.Şti implements personal data processing activity for tracking guest entry and exits in service building for providing security by **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** and other purposes stated in this Policy. The aforementioned personal data owners are notified about this subject when the guests' identification information are taken in service building or through texts provided for the access of guests by posting or via other methods by **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** . Data obtained for the purpose of guest entry and exits can only be processed for this purpose and related people are registered in data recording system in physical media.

17.2. Keeping The Records of Internet Access Provided to Visitors in **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** Service Building

Internet access is provided to the visitors for the period spent within the building and facilities by **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** to provide security and for other purposes stated in this policy. In this case, logs related to internet access are kept according to provisions of Law Number 5651 and the legislation regulated pursuant to this Law, and these logs can be processed for the purpose of performing required legal obligations in audit processes to be carried out within **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** or in the event of a request is made by authorized governmental organizations and institutions.

18. REQUIREMENTS FOR DESTRUCTION OF PERSONAL DATA (DELETE, DESTROY, ANONYMIZE)

According to "Regulation on Deletion, Destruction or Anonymization of Personal Data" published by the Council and Article 7 of Law on Protection of Personal Data, and Article 138 of Turkish Criminal Code, personal data are deleted, destroyed or anonymized upon the request of data owner or according to the decision of **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** when the requirements of process cease to be, even though they are processed according to related provisions of the law. **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** has formed a policy about this subject according to provisions of regulation and implements destruction procedure pursuant to this policy. According to this regulation, a Destruction Instruction has been formed by **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** within the scope of BGYS, and periodic destructions are implemented with specific intervals with the initiation of obligation.

19. RIGHTS OF PERSONAL DATA OWNERS; THE USE OF THESE RIGHTS

Ukinox Ankastre Sist.San.Tic.Ltd.Şti notifies the data owner according to Article 10 of Law on Protection of Personal Data and directs personal data owner about how these rights, which are stated in Article 11 of Law on Protection of Personal Data, will be used, and conducts necessary channels, internal operation, administrative and technical regulations according to Article 13 of Law on Protection of Personal Data to notify personal data owners and to evaluate the rights of personal data owners.

19.1. Rights of Personal Data Owners and Using These Rights

19.1.1 Rights of Personal Data Owners

Personal data owners have the following rights:

- a. To learn whether their personal data is processed,
- b. Request information about their personal data if they are processed,
- c. To learn the purpose of processing their personal data and whether their personal data is used according to this purpose,
- d. To know about third parties to which their personal data is transmitted in domestic or in abroad,
- e. To request their personal data to be corrected if they are processed erroneously or incorrectly and request the transaction implemented within the scope to be notified to third parties to whom their personal data is transmitted,

f. To request the deletion or destruction of your personal data in the event of the reasons for them requiring to be processed are eliminated even though they are processed according to provisions of Law number 6698 and other related laws, and request this transaction to be notified to third parties to whom your personal data is transmitted within this scope,

g. To object to a result to the detriment of them occurring by analyzing through automatic systems exclusive to the processed data and

h. To demand the damage to be compensated if they incur damages due to their personal data being illegally processed

19.1.2 Cases That Cannot Be Claimed by Personal Data Owners

Since the cases below are excluded from the scope of Law on Protection of Personal Data according to Article 28 of Law on Protection of Personal Data, personal data owners cannot allege the rights listed in 20.1.1 about these subjects:

a. To process personal data for the purposes such as research, planning and statistics by being anonymized with official statistics,

b. To process personal data within the freedom of speech or for purposes of art, history, literature or scientific goals, provided that they do not violate national defense, national security, public security, public order, economic security, the right to privacy or personal rights or constitute a crime,

c. To process personal data within the scope of preventive, protective and informative activities conducted by governmental organizations and institutions which are authorized and assigned by law to provide national defense, national security, public security, public order or economic security,

d. The personal data to be processed by judicial office or enforcement authorities related to investigation, prosecution, trial or enforcement procedures,

According to Article 28/2 of Law on Protection of Personal Data, personal data owners cannot claim their other rights stated in 20.1.1, except the right to compensation of personal data owners in the cases listed below:

a. If the personal data processing is necessary for a crime investigation or to prevent a crime,

b. If personal data which is disclosed by data owner is processed,

c. If it is necessary to process personal data by assigned or authorized governmental organizations and institutions and public professional organizations based on the power granted by the law or for an discipline investigation or prosecution and the conduct of auditing and regulation duties,

d. If personal data processing is necessary to protect economic and financial interests of the Government related to budget, tax and financial subjects.

19.1.3 Use of Rights by Personal Data Owner

Personal data owners can convey their claims regarding their rights stated in this Policy with information and documents indicating their identities or other methods determined by Council of Protection of Personal Data by filling and signing Application Form and submitting to **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** free of charge.

- To apply personally by filling and signing the form available in www.ukinox.com address or in written through certified mail to Barbaros Hayrettin Paşa Mh. 1992 Sk. No:14 D:109-110-11 Esenyurt, İstanbul, Turkey address,
- Sending a registered electronic mail to ukinox@hs02.kep.tr address after filling a form available in www.ukinox.com address and signing the form with "secure electronic signature" within the scope of Electronic Signature Law number 5070, applying to ukinox@hs02.kep.tr mail address through an application or software developed for the purpose of making an application or by using electronic mail address previously notified to **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** and registered to the system of **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** by the related person with secure electronic signature or mobile signature.

For the application above to be accepted as valid, the information of the related person such as:

- a) Name, surname and signature if the application is made in written,
- b) If the applicant is Turkish citizen, the person's R.T. Identification number, if they are a foreigner, their nationality and passport number or, if available, their identification number,
- c) Address of residence or address of work place,
- ç) If available, e-mail address, telephone and fax number,
- d) The subject of the claim

must be stated. Otherwise, the application will not be evaluated as a valid application.

In applications to be made without filling an application form to **Ukinox Ankastre Sist.San.Tic.Ltd.Şti**, if the application will be made by a third person in the name of personal data owner, there must be special power of attorney issued by public notary in the name of the person who will make the application given by personal data owner including the subjects stated here.

20. THE RELATIONSHIP OF POLICY ON PROTECTION AND PROCESSING OF PERSONAL DATA WITH OTHER POLICIES

Ukinox Ankastre Sist.San.Tic.Ltd.Şti has formed the fundamental subjects stated in this document based on sub-procedures for internal use in the subject of protection and processing the personal data and policies regarding other data assets in the structure of **Ukinox Ankastre Sist.San.Tic.Ltd.Şti**.

21. COORDINATION ON PROCEDURES OF PROTECTION AND PROCESSING OF PERSONAL INFORMATION

A management structure is established to provide the compliance to provisions of Law on Protection of Personal Data and the operation of Policy of Protection and Processing of Personal Data.

Information Security Committee has been assigned according to decision of senior management of company administer this Policy and other related policies related and connected to this Policy within the structure of ***Ukinox Ankastre Sist.San.Tic.Ltd.Şti***.

The duties of this Committee related to protection of personal data are as follows:

- To submit fundamental policies regarding the protection and processing of personal data for the approval of senior management when necessary, to issue changes and to put them into effect,
- To decide on how practice and supervision of personal data protection and processing policies will be implemented and within this scope, to submit the subjects of internal assignment and coordination for the approval of senior management,
- To determine the subjects required to be implemented to provide compliance to Law on Protection of Personal Data and related legislation and to submit them for the approval of senior management, to supervise their implementation and to provide coordination,
- To increase awareness about the protection and processing of personal data within ***Ukinox Ankastre Sist.San.Tic.Ltd.Şti*** and before organizations with which ***Ukinox Ankastre Sist.San.Tic.Ltd.Şti*** cooperates,
- To provide necessary measures to be taken by determining the risks that may occur in personal data processing activities of ***Ukinox Ankastre Sist.San.Tic.Ltd.Şti***, and to submit the improvement recommendations to the approval of senior management,
- To provide trainings about notification regarding personal data processing activities and legal rights of personal data owners, and about implementation and emission of protection of personal data and conducting the policies,
- To decide on the applications of personal data owners at the highest level,
- To follow-up developments and regulations related to protection of personal data, and to get recommendations about the actions to be implemented within ***Ukinox Ankastre Sist.San.Tic.Ltd.Şti*** according to these developments and regulations,
- To conduct relations with Council and Organization of Personal Data Protection,
- To implement other duties given by company's senior management about protection of personal data.

ATTACHMENT-1 DEFINITIONS

Express Consent: Consent disclosed with free will and based on notification related to a specific subject.

Anonymization: The personal data is changed and will lose its characteristic of being personal data and this will not be reverted. For example: The personal data cannot be related to a real person by using techniques such as masking, aggregation, data disruption etc.

Application Form: "Application Form Regarding Applications To Be Made to Data Controller by The Related Person (Personal Data Owner) According To Law on Protection of Personal Data number 6698" including the application made by personal data owners to use their rights.

Intern: Real persons who have applied to **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** in any way for employment or disclosed their resume and related information.

Employees, Shareholders and Officials of Organizations in Cooperation: Real persons working in organizations with which **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** have any kind of business relation (such as, but not limited to, business partner, supplier), including the shareholders and officials of these organizations.

Business Partner: The parties with which Ukinox Ankastre Sist.San.Tic.Ltd.Şti has partnership for the purposes such as conducting projects, getting services while it carries out its commercial activities.

Processing of Personal Data: All kinds of procedures implemented over the data such as obtaining, recording, storing, keeping, changing, reforming, explaining, conveying, taking over, making obtainable, classifying or preventing the usage of the personal data through partial or complete automatic or non-automatic methods which is not a part of any data recording system.

Personal Data Owner: The real person whose personal data will be processed. For example; customer, personnel, supplier employee

Personal Data: All kinds of information about real person whose identity is specific or can be determined. Thus, the processing the data of legal entity is not within the scope of Law. For example; name-surname, R.T. ID no, e-mail, address, date of birth, credit card number etc.

Personal Data With Special Quality: Race, ethnic origin, political view, philosophical belief, religion, creed or other beliefs, appearance, association, foundation or union membership, health, sexual life, penal conviction and data regarding security measures, and biometric and genetic data.

Supplier: The parties which provide service to Ukinox Ankastre Sist.San.Tic.Ltd.Şti based on contract and according to orders and instructions of Ukinox Ankastre Sist.San.Tic.Ltd.Şti while conducting the commercial activities of Ukinox Ankastre Sist.San.Tic.Ltd.Şti.

Third Party: Real persons that are not identified differently but processed within the scope of personal data policy. **(For example: family members, former employees).**

Data Processor: Real and legal person who processes personal data in the name of data controller based on the authority provided by data controller. For example, cloud IT company which keeps the data.

Data Controller: The person who determines the purposes and methods of personal data processing procedure and manages the place in which the data is kept systematically (data recording system). Within the scope of this policy, Ukinox Ankastre Sist.San.Tic.Ltd.Şti is data controller.

Deletion of Data: Means encoding all related users within the company to prevent the access to personal data and only providing a password to data controller.

Destruction of Data: Means to destruct personal data completely and irrevocably by physical or technological methods.

Visitor: Real persons who enter physical facilities of **Ukinox Ankastre Sist.San.Tic.Ltd.Şti** or visits our website.

DATA CONTROLLER

UKİNOX ANKASTRE SİST. SAN. TİC. LTD.ŞTİ.

Address: Barbaros Hayrettin Paşa Mh. 1992 Sk. No:14 D:109-110-110 Esenyurt/İstanbul

Marmara Corporate Tax Office: 887 029 4616

Mersis No: 0088 702 946 160 0012

Telephone: +90 (212) 886 95 98 Fax: +90 (212) 886 91 95

INFORMATION SECURITY POLICY

- To provide confidentiality and integrity of information of our company and customers,
- To provide necessary infrastructure to guarantee the continuity of our company's services,
- To take physical and reasonable security measures suitable to the value of the information,
- To assign access rights and to prevent unauthorized access according to "need to know" principle to control access to information,
- To protect information assets against attacks that may occur in cyber environment out of Company and with harmful codes such as virus,
- To develop an intervention procedure against information security events,
- To provide information security trainings to its employees and to increase awareness on information security,
- To comply with laws and regulations,
- To provide shareholders comply with our company's Information Security Policies,

- To comply with secure system engineering principles,

COOKIE USE APPROVAL

This website places cookies in your computer or mobile device that you use for the purpose of enabling efficient work of the site and developing the user experience. You will be deemed to approve use of cookies by continuing to use our website (clicking, scrolling the page, closing the cookies disclaimer). You can limit or completely prevent receiving this information by implementing necessary adjustments, if you wish.

POLICY OF PROTECTION OF PERSONAL DATA

To process personal data according to law and rules of honesty,

To guarantee the accuracy and recency of processed personal data,

To process personal data in limits, measured and in connection with the purpose,

To keep personal data for the period required for the purpose that they are processed or according to the related legislation,

To provide all our employees to work by taking necessary measures and with a careful awareness to Protect the Personal Data.

To make investments and provide trainings necessary for protection of personal data.