

**AKIŞ ASANSÖR MAKİNE MOTOR
DÖKÜM SAN. TİC. LTD. ŞTİ.
PERSONAL DATA PROCESSING
AND PROTECTION POLICY**

CONTENTS

1. DEFINITIONS AND ABBREVIATIONS	3
2. PURPOSE	4
3. SCOPE	4
4. PROCESSING OF PERSONAL DATA.....	5
A- PRINCIPLES GOVERNING PERSONAL DATA PROCESSING	5
B- CONDITIONS FOR PROCESSING PERSONAL DATA	5
C- PROCESSING SPECIAL CATEGORIES OF PERSONAL DATA	6
D- INFORMING THE DATA SUBJECT	6
E- CATEGORIES OF DATA SUBJECTS	7
F- PURPOSES OF PROCESSING PERSONAL DATA	7
G- RETENTION PERIOD FOR PERSONAL DATA	8
5. TRANSFER OF PERSONAL DATA.....	10
A- PRINCIPLES GOVERNING DATA TRANSFERS.....	10
B- RECIPIENT GROUPS AND PURPOSES OF TRANSFER.....	11
6. RIGHTS OF DATA SUBJECTS	12
A- RIGHTS	12
B- HOW TO EXERCISE RIGHTS	12
C- RESPONSE BY THE DATA CONTROLLER	13
7. SECURITY OF PERSONAL DATA	13
A- TECHNICAL MEASURES.....	13
B- ADMINISTRATIVE MEASURES	15
8. DISPOSAL OF PERSONAL DATA.....	16
A- GROUNDS FOR DISPOSAL	16
B- METHODS OF DISPOSING OF PERSONAL DATA.....	16
9. PUBLICATION AND RETENTION OF THE POLICY, EFFECTIVE DATE AND UPDATES	17

1. DEFINITIONS AND ABBREVIATIONS

Recipient Group: A category of natural or legal persons to whom the data controller transfers personal data.

Inventory: The Personal Data Processing Inventory.

Relevant Law: Law No. 5378 on Persons with Disabilities.

Authorized User: Persons who process personal data within the organization of the data controller or under the authority and instructions received from the data controller, excluding persons or units responsible for the technical storage, protection and backup of data.

Disposal: The deletion, destruction or anonymization of personal data.

OHS Law: The Occupational Health and Safety Law.

Law: The Personal Data Protection Law No. 6698.

Recording Medium: Any medium containing personal data processed by fully or partly automated means or by non-automated means as part of a data filing system.

Personal Data Processing Inventory: An inventory in which data controllers detail their personal data processing activities in connection with business processes, indicating the purposes of processing, data categories, recipient groups and groups of data subjects.

Board: The Personal Data Protection Board.

Authority: The Personal Data Protection Authority.

Special Categories of Personal Data: Data concerning a person's race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sex life, criminal convictions and security measures, and biometric and genetic data.

Periodic Disposal: The deletion, destruction or anonymization carried out automatically at recurring intervals specified in the personal data retention and disposal policy when all conditions for processing under the Law cease to exist. In this Policy, those intervals refer to June and December.

Policy: The Personal Data Processing and Protection Policy of Akış Asansör Makine Motor Döküm San. Tic. Ltd. Şti.

Register: The Data Controllers' Registry maintained by the Presidency of the Personal Data Protection Authority.

Data Filing System: A filing system in which personal data is structured and processed according to specified criteria.

Data Controller: A natural or legal person who determines the purposes and means of processing personal data and is responsible for establishing and managing the data filing system.

Akış Asansör: Akış Asansör Makine Motor Döküm San. Tic. Ltd. Şti. (Data Controller)

Company: Akış Asansör Makine Motor Döküm San. Tic. Ltd. Şti. (Data Controller)

2. PURPOSE

The Personal Data Processing and Protection Policy of Akış Asansör Makine Motor Döküm San. Tic. Ltd. Şti. was prepared to establish the procedures and principles governing the processing and protection activities carried out by Akış Asansör.

In accordance with the fundamental principles established by law, Akış Asansör prioritizes processing the personal data of Company employees, job applicants, service and product providers, customers, visitors and other third parties in compliance with the Constitution of the Republic of Türkiye, international conventions, the Personal Data Protection Law No. 6698 (the “Law”) and other applicable legislation, and enabling data subjects to exercise their rights effectively.

Akış Asansör carries out activities relating to the processing and protection of personal data in accordance with the Policy prepared for this purpose.

3. SCOPE

The Personal Data Processing and Protection Policy of Akış Asansör Makine Motor Döküm San. Tic. Ltd. Şti. (hereinafter the “Policy”) covers the departments and employees of Akış Asansör that process personal data, its business partners with whom it shares data, natural and legal persons from whom it purchases goods and services, third parties, public institutions and organizations, and natural and legal persons authorized by law.

This Policy covers the protection activities relating to the processing carried out by Akış Asansör on personal data and applies to every form of processing.

If the applicable legislation changes or is updated, Akış Asansör will update the Policy accordingly and publish it in this section of its website.

If a legal obstacle or incompatibility arises in the implementation of this Policy, or an update is required in light of new regulations, Akış Asansör may redefine, amend and update the Policy and its implementation.

4. PROCESSING OF PERSONAL DATA

A- PRINCIPLES GOVERNING THE PROCESSING OF PERSONAL DATA

Our Company observes the following general principles in protecting personal data:

- Processing lawfully, fairly and transparently, in accordance with the principle of good faith.
- Keeping data accurate and, where necessary, up to date.
- Processing for specified, explicit and legitimate purposes.
- Ensuring processing is relevant, limited and proportionate to its purposes.
- Retaining data for the period prescribed by law or necessary for its processing purposes.

B- CONDITIONS FOR PROCESSING PERSONAL DATA

- *Explicit Consent of the Data Subject*

One condition for processing personal data is the data subject's explicit consent. Consent must relate to a specific matter, be informed and be given freely.

Where any of the following conditions for processing applies, personal data may be processed without the data subject's explicit consent.

- *Express Provision by Law*

This condition applies if the processing of the data subject's personal data is expressly provided for by law, in other words, if the applicable law contains an explicit provision authorizing such processing.

- *Inability to Obtain Explicit Consent Due to Practical Impossibility*

Personal data may be processed and/or transferred where necessary to protect the life or physical integrity of a person who cannot express consent because of practical impossibility or whose consent cannot be legally recognized, or to protect another person.

- *Direct Connection with the Establishment or Performance of a Contract*

This condition may be met where processing is necessary and directly related to the establishment or performance of a contract to which the data subject is a party.

- *Compliance with the Company's Legal Obligation*

The data subject's personal data may be processed where necessary for our Company to fulfil its legal obligations.

- *Making Personal Data Public by the Data Subject*

Where the data subject has made personal data public, that data may be processed only for the purpose for which it was made public.

- *Necessity of Processing for the Establishment or Protection of a Right*

The data subject's personal data may be processed where necessary for the establishment, exercise or protection of a right.

- *Necessity of Processing for the Company's Legitimate Interest*

The data subject's personal data may be processed where necessary for our Company's legitimate interests, provided this does not harm the data subject's fundamental rights and freedoms.

C- CONDITIONS FOR PROCESSING SPECIAL CATEGORIES OF PERSONAL DATA

Our Company processes special categories of personal data in accordance with the principles in this Policy, after taking all necessary administrative and technical measures, including methods specified by the Board, where the following conditions apply:

- Special categories of personal data other than health and sex-life data may be processed without explicit consent where expressly provided for by law, in other words, where the law governing the relevant activity explicitly permits such processing. Otherwise, the data subject's explicit consent will be obtained.
Information and documents collected in this context are processed on the basis of consent.
- Data concerning health and sex life may be processed without explicit consent by persons subject to a duty of confidentiality or authorized institutions and organizations for the protection of public health, preventive medicine, medical diagnosis, treatment and care, and the planning and management of healthcare services and their financing. Otherwise, explicit consent will be obtained.
Health information obtained in this context may also be processed without consent within the scope of the Occupational Health and Safety Law and mandatory medical procedures, limited to the circumstances listed above.

D- INFORMING THE DATA SUBJECT

Akış Asansör informs data subjects in accordance with Article 10 of the Law and secondary legislation. It explains who processes their personal data as data controller, for what purposes, with whom and for what purposes it is shared, by what methods it is collected, the legal basis for processing, and the rights data subjects have concerning that processing.

In accordance with international legislation, the retention period is also specified or, where that period cannot be stated,

the criteria used to determine it are given, together with whether processing is mandatory and the consequences if mandatory processing does not take place.

Accessibility standards under the Law on Persons with Disabilities are observed when providing the notice on camera recording required for physical security and monitoring.

E- CATEGORIES OF DATA SUBJECTS WHOSE DATA IS PROCESSED

Data subjects within the scope of the Akış Asansör Personal Data Protection Policy whose personal data is processed by Akış Asansör are grouped below.

- *Akış Asansör Job Applicants*

Persons who have not entered into an employment contract with Akış Asansör but are being considered for one.

- *Akış Asansör Business Partners, Representatives and Employees*

Natural-person representatives, shareholders and employees of organizations, businesses and companies with which Akış Asansör has commercial relations.

- *Akış Asansör Visitors*

Natural persons who visit Akış Asansör premises or websites operated by Akış Asansör.

- *Other Natural Persons*

All natural persons who are not covered by the Akış Asansör Employees' Personal Data Protection and Processing Policy.

F- PURPOSES OF PROCESSING PERSONAL DATA

- *Determining, planning and implementing Akış Asansör's short-, medium- and long-term commercial policies:*
 - i. Carrying out strategic planning activities
 - ii. Managing relationships with business partners, customers and suppliers
- *Designing and Carrying Out Akış Asansör's Human Resources Activities:*
 - i. Managing employee recruitment processes
 - ii. Planning and carrying out intern and student recruitment, placement and operational processes
 - iii. Planning human resources processes
 - iv. Fulfilling obligations arising from employment contracts and legislation for Company employees
 - v. Monitoring and supervising employees' work activities
 - vi. Planning and providing employee benefits and entitlements
 - vii. Planning and carrying out employee departure procedures
 - viii. Planning and monitoring employee performance appraisals

- ix. Planning and conducting in-house training
 - x. Managing relationships with business partners and suppliers
 - xi. Payroll management
 - xii. Planning and carrying out in-house orientation and social activities
 - xiii. Fulfilling information and document obligations in judicial and administrative proceedings
- *Carrying Out the Work Required by the Company's Business Units to Conduct Akış Asansör's Commercial Activities in Compliance with Legislation and Company Policies:*
 - i. Monitoring finance and accounting matters
 - ii. Managing investor relations
 - iii. Planning and conducting corporate communications
 - iv. Planning and conducting corporate sustainability activities
 - v. Planning and carrying out analyses of the effectiveness, efficiency and appropriateness of business activities
 - vi. Event management
 - vii. Establishing and managing information technology infrastructure
 - viii. Planning, supervising and implementing information security processes
 - *Other purposes of processing:*
 - i. Ensuring the commercial, technical and legal security of persons and entities with which Akış Asansör has a business relationship and communicating with them;
 - ii. Protecting the commercial reputation of Akış Asansör and the trust it has established;
 - iii. Complying with recordkeeping, reporting and information obligations prescribed by public authorities under the applicable legislation and fulfilling related legal obligations;
 - iv. Examining, evaluating and responding to requests from public authorities or relevant persons;
 - v. Ensuring the security and monitoring of Company premises through camera recordings and other systems;
 - vi. Preserving evidence to meet the burden of proof in legal disputes that may arise in the future;
 - vii. Processing within the conditions and purposes for personal data processing specified in Articles 5 and 6 of the KVKK.

G- RETENTION PERIOD FOR PERSONAL DATA

PROCESSES	RETENTION PERIOD	DISPOSAL PERIOD
Commercial Operations	10 years	At the first periodic disposal after the retention period expires
Preparation and Performance of Contracts	10 years after the contract ceases to affect the relevant work and transactions	At the first periodic disposal after the retention period expires

Communications with the Company	10 years after the activity ends	At the first periodic disposal after the retention period expires
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Human Resources Processes	10 years after the employment contract and related legal process end	At the first periodic disposal after the retention period expires
Log Monitoring Systems	2 years	At the first periodic disposal after the retention period expires
Hardware and Software Access Processes	2 years	At the first periodic disposal after the retention period expires
Visitor Records	2 years	At the first periodic disposal after the retention period expires
Camera Recordings	2 months	At the first periodic disposal after the retention period expires
Job Applicant Form / CV	Immediately if the job role applied for ceases to exist; otherwise 2 years	At the first periodic disposal after the retention period expires
Data Controller Application Form	10 years after the application and any proceedings before the Authority end	At the first periodic disposal after the retention period expires
Corporate Records	99 years	At the first periodic disposal after the retention period expires

5. TRANSFER OF PERSONAL DATA

A- PRINCIPLES AND RULES GOVERNING THE TRANSFER OF PERSONAL DATA

Even without the data subject's explicit consent, personal data may be transferred to third parties where one or more of the conditions below apply, provided that our Company exercises due care and takes all necessary security measures, including those prescribed by the Board:

- The relevant transfer activities are expressly provided for by law,
- Transfer by the Company is directly related to and necessary for the establishment or performance of a contract,
- Transfer is necessary for our Company to fulfil a legal obligation,
- The data subject has made the data public and our Company transfers it only for the purpose for which it was made public,
- Transfer by the Company is necessary to establish, exercise or protect the rights of the Company, the data subject or third parties,
- Transfer is necessary for the Company's legitimate interests, provided the data subject's fundamental rights and freedoms are not harmed,
- Transfer is necessary to protect the life or physical integrity of a person who cannot express consent due to practical impossibility or whose consent is not legally valid, or of another person.

In addition, personal data may be transferred to foreign countries declared by the Board to provide adequate protection (“Foreign Country Providing Adequate Protection”) where any of the above conditions apply. Where adequate protection is absent, data may be transferred under the statutory transfer conditions to foreign countries where the data controllers in Türkiye and the relevant foreign country have undertaken adequate protection in writing and the Board has granted permission (“Foreign Country of a Data Controller Undertaking Adequate Protection”).

B- RECIPIENT GROUPS AND PURPOSES OF TRANSFER

Personal data transfers by Akış Asansör are carried out in compliance with the transfer conditions laid down in Articles 8

8. and 9 of the Personal Data Protection Law.

i. Domestic Transfer of Personal Data

In accordance with Article 8 of the Personal Data Protection Law, Akış Asansör observes the conditions for processing data in domestic transfer activities.

ii. Transfer of Personal Data Abroad

Under Article 9 of the Personal Data Protection Law, Akış Asansör may transfer personal data abroad in accordance with the conditions for processing personal data where the destination country is among those declared by the Board to provide adequate protection or, if adequate protection is absent, where the data controllers in Türkiye and the relevant foreign country undertake adequate protection in writing and the Board grants permission.

iii. Groups of Persons to Whom Akış Asansör Transfers Personal Data

In accordance with Articles 8 and 9 of the Personal Data Protection Law, Akış Asansör may transfer the personal data of persons covered by its Personal Data Protection Policy to the following groups for the stated purposes:

- To Akış Asansör business partners, limited to establishing and maintaining the business partnership,
- To Akış Asansör suppliers, limited to the purposes of obtaining supplies and carrying out Akış Asansör's commercial activities,
- To authorized public institutions and organizations (including relevant municipalities) and authorized private-law persons (including relevant elevator companies), limited to purposes they request within their legal authority,
- To third parties in accordance with the conditions for transferring personal data.

6. RIGHTS OF DATA SUBJECTS

A- RIGHTS

Data subjects have the following rights:

- To learn whether their personal data is being processed,
- To request information if their personal data has been processed,
- To learn the purpose of processing their personal data and whether it is used in accordance with that purpose,
- To know the third parties in Türkiye or abroad to whom their personal data has been transferred,
- To request the correction of incomplete or inaccurate personal data and notification of that correction to third parties to whom the data was transferred,
- To request deletion or destruction of personal data when the reasons requiring its processing no longer exist, even if it was processed in accordance with the KVKK and other applicable laws, and notification of that action to third parties to whom the data was transferred,
- To object to a result against them arising from the analysis of processed data exclusively by automated systems,
- To request compensation for damage suffered as a result of unlawful processing of their personal data.

If an application is rejected, the response is considered insufficient or no response is received within the prescribed period, the data subject may complain to the Personal Data Protection Board within thirty days of learning of the data controller's response and, in any event, within sixty days of submitting the application. Under Article 13 of the Law, a complaint cannot be made before the application procedure has been exhausted.

Under international legislation, data subjects also have the right to request restriction of processing and to withdraw consent to the processing or transfer of their personal data, in addition to the rights listed above.

B- HOW TO EXERCISE RIGHTS

Data subjects may exercise their rights using the Data Controller Application Form at akisasansor.com.tr (see Application Notice), by submitting a written document in person, sending a notice through a notary, submitting an electronically signed document, using a mobile signature, or emailing from an address previously registered in the system.

Application Notice:

Application Method	Application Address	Information to Include
In-Person Application [The applicant appears personally with proof of identity]	OSB, Kayacik Mah. Ziyaeddin Cad. 6.Sokak No:2 Selçuklu/KONYA	Write "Information Request Under the Personal Data Protection Law" on the envelope.
Application Through a Notary	OSB, Kayacik Mah. Ziyaeddin Cad. 6.Sokak No:2 Selçuklu/KONYA	Write "Information Request Under the Personal Data Protection Law" on the notice envelope.
Application with a Secure Electronic Signature [Signed using a secure electronic signature and submitted through Registered Electronic Mail (KEP)]	info@akisasansor.com.tr	In the email subject line, write "Personal Data Protection Law Information Request".
Application by Mobile Signature or Email [Using an email address previously provided to the data controller and registered in the data controller's system]	info@akisasansor.com.tr	In the email subject line, write "Personal Data Protection Law Information Request".

If an application is rejected, the response is considered insufficient or no response is received within the prescribed period, the data subject may complain to the Personal Data Protection Board within thirty days of learning of the data controller's response and, in any event, within sixty days of submitting the application. Under Article 13 of the Law, a complaint cannot be made before the application procedure has been exhausted.

Data provided to the Company through the application form is processed and protected in accordance with the procedures and principles in this Policy.

C- RESPONSE TO REQUESTS BY THE DATA CONTROLLER

Our Company takes the necessary administrative and technical measures to resolve applications from data subjects in accordance with the Law and secondary legislation.

If a data subject duly submits a request concerning the rights listed above, our Company will resolve the request free of charge as soon as possible and no later than 30 (thirty) days, depending on its nature. If the process entails an additional cost, a fee may be charged according to the tariff set by the Board.

7. SECURITY OF PERSONAL DATA

A- TECHNICAL MEASURES

The technical measures taken by Akış Asansör concerning the personal data it processes are listed below:

- Various tests identify risks, threats, weaknesses and vulnerabilities, if any, in the Company's information systems, and appropriate measures are taken.
- Risks and threats that could affect information-system continuity are monitored continuously through real-time analysis and information-security incident management.

- Access to information systems and user authorization are managed through security policies, an access and authorization matrix, and the corporate Active Directory.
- Measures are taken to protect the physical security of Akış Asansör's information-system equipment, software and data.
- Hardware measures (including cameras, alarms and locks) and software measures (including firewalls, intrusion prevention, network access control and anti-malware systems) are taken to secure information systems against environmental threats.
- Risks of unlawful processing are identified, appropriate technical measures are implemented, and technical checks of those measures are carried out.
- Access procedures are established within Akış Asansör, and reporting and analysis of access to personal data are conducted.
- Access to storage areas containing personal data is logged, and inappropriate access or attempted access is monitored.
- The Authority takes the necessary measures to ensure deleted personal data is inaccessible to and cannot be reused by authorized users.
- Akış Asansör has established a system and infrastructure to notify the data subject and the Board if personal data is obtained unlawfully by others.
- Security vulnerabilities are monitored, appropriate patches are installed, and information systems are kept up to date.
- Strong passwords are used in electronic environments where personal data is processed.
- Secure logging systems are used in electronic environments where personal data is processed.
- Data backup programs are used to ensure personal data is stored securely.
- Access to personal data stored in electronic and non-electronic environments is restricted according to access-control principles.
- A separate policy has been established for the security of special categories of personal data.
- Employees involved in processing special categories of personal data receive training on their security, sign confidentiality agreements, and have defined access permissions.

- Electronic environments in which special categories of personal data are processed, stored and/or accessed are protected by cryptographic methods; cryptographic keys are held securely; security updates are monitored continuously; necessary security tests are carried out regularly and their results recorded.
- Adequate security measures are taken in physical environments where special categories of personal data are processed, stored and/or accessed, and unauthorized entry and exit are prevented.
- Where special categories of personal data must be transferred by email, they are sent in encrypted form from a corporate email address or through a registered electronic mail (KEP) account. For transfer on portable memory, CD, DVD or similar media, the data is encrypted using cryptographic methods and the key is kept separately. Transfers between servers in different physical locations are made between the servers or by sFTP. For paper transfers, measures are taken against theft, loss or unauthorized viewing, and documents are sent marked “confidential.”

B- ADMINISTRATIVE MEASURES

The administrative measures taken by Akış Asansör concerning the personal data it processes are listed below:

- Employees receive training to develop their qualifications, prevent unlawful processing of and access to personal data, ensure its preservation, and improve their communication techniques, technical knowledge and understanding of the legislation.
- Employees sign confidentiality agreements concerning activities carried out by Akış Asansör.
- A disciplinary procedure has been prepared for employees who fail to comply with security policies and procedures.
- Where third parties help store personal data, contracts with the companies receiving the data include provisions establishing their obligations and responsibilities to take the security measures necessary to protect and store the data securely. As a general principle, the businesses receiving data should also have the necessary certifications and compliance processes.
- Physical storage areas for personal data are secured and access is restricted.
- A personal data processing inventory has been prepared.
- Periodic and random internal audits are conducted.

- The workplace has the equipment necessary, particularly for physical destruction.
- Measures compliant with accessibility standards under the Law on Persons with Disabilities are taken when providing the notice concerning camera recording required for physical security and monitoring.

8. DISPOSAL OF PERSONAL DATA

A- GROUND FOR DISPOSAL

Personal data is disposed of where:

- The relevant legal provisions underlying its processing are amended or repealed,
- The purpose requiring its processing or retention ceases to exist,
- Processing is, or subsequently becomes, contrary to law or the principle of good faith,
- Akış Asansör accepts the data subject's request for deletion or destruction under the rights provided by Article 11 of the Law,
- Akış Asansör rejects a request for deletion, destruction or anonymization, gives an insufficient response or does not respond within the statutory period, and the data subject complains to the Board and the Board upholds the request (instruction of the Authority or Board),
- The maximum period requiring retention has expired and there is no ground justifying longer retention,
- The contract between the parties was never concluded, is invalid, ends automatically, is terminated or is rescinded,
- The data subject withdraws explicit consent where processing was based solely on that consent,

in which cases Akış Asansör deletes or destroys the data at the data subject's request or, on its own initiative, deletes, destroys or anonymizes it.

B- METHODS OF DISPOSING OF PERSONAL DATA

Personal data may be disposed of in three ways: deletion, destruction or anonymization.

i. Deletion of Personal Data

Deletion means making personal data inaccessible to and unusable by authorized users. Akış Asansör deletes or destroys personal data on its own decision or at the data subject's request where the reasons for processing cease to exist and the circumstances specified in the Regulation arise, even if the data was processed in accordance with applicable law.

ii. Destruction of Personal Data

Destruction means making personal data inaccessible, irretrievable and unusable by anyone. Destruction

is carried out where Akış Asansör processes data on physical recording media. Akış Asansör must make the data irretrievable and will take all necessary technical and administrative measures.

iii. Anonymization of Personal Data

Anonymization means making personal data impossible to associate with an identified or identifiable natural person, even when matched with other data, where Akış Asansör processes it wholly or by automated means. Methods such as one-way functions and encryption may be used. Akış Asansör will take all necessary technical and administrative measures relating to anonymization.

9. PUBLICATION AND RETENTION OF THE POLICY, EFFECTIVE DATE AND UPDATES

The Policy is published in two formats, a signed paper copy and an electronic copy, and is made publicly available on the website. The paper copy is kept on file at the Company.

The Policy takes effect upon publication on the Company's website. If it is withdrawn, old signed paper copies are cancelled (by stamping or writing “cancelled”), signed by the Company's authorized signatory or signatories, and retained by the Company for at least five years.

The Policy may be updated after a change in the applicable legislation or whenever necessary.