



**HAKSAN OTOMOTİV MAMULLERİ  
SANAYİ VE TİCARET ANONİM ŞİRKETİ**

**PERSONAL DATA PROCESSING AND  
PROTECTION POLICY**



## PERSONAL DATA PROCESSING AND PROTECTION POLICY

We, as Haksan Otomotiv Mamulleri San. ve Tic. A.Ş.,  
having our administrative management in Bursa and also operating in Manisa and Russia with almost 450 workers, provide services in the fields of automotive, home appliance, construction, rail system and defence industry.

We are aware of our responsibility about security and legal protection of personal data which is regulated as a constitutional right and we attach great importance to confidentiality and security of your personal data processed within our company.

Accordingly, we have been founding systems related to operating any kind of activities which is necessary for alignment with the all legislation, especially with the Personal Data Protection Law numbered 6698 and have been examining the operability of these systems finically.

“Personal Data Processing and Protection Policy “is amended by our company and entered into force which regulates the obligations stipulated under the scope of Personal Data Protection Law numbered 6698 and the relevant principles and procedures to be applied within this scope.

**HAKSAN OTOMOTİV MAMULLERİ SAN. VE TİC. A.Ş**

**MANAGING BOARD**

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## **DEFINITIONS AND ABBREVIATIONS**

<b>Explicit Consent</b>	refers to the freely given, specific and informed consent.
<b>Constitution</b>	refers to Turkish Constitution published in the Official Gazette with the journal number of 17863 (repeated) on November 9, 1982.
<b>Anonymization</b>	implies that personal data cannot be associated with any real or identifiable real person in any way even when matched with other data.
<b>Communique on Obligation to Inform</b>	refers to Communique on the Principles and Procedures for Fulfilment of Information Obligation which is published in the Official Gazette with the journal number of 30356 on March 10, 2018.
<b>Data Recording Medium</b>	is any kind of environment where personal data is processed completely or partially; automatically or by non-automatic means provided that it is part of any data recording system.
<b>Personal Data</b>	refers to all and any information relating to an identified or identifiable natural person (e.g. name-surname, ID no, e-mail, address, date of birth, credit card number etc.).
<b>Personal Data Processing</b>	Refers to any operation performed upon personal data such as collection, recording, storage, retention, alteration, re-organization, disclosure, transferring, taking over, making retrievable, classification or preventing the use thereof, fully or partially through automatic means or provided that the process is a part of any data registry system, through non-automatic means.
<b>Data Subject</b>	refers to all real persons whose personal data is processed. These persons may include but not limited to employees, customers, business partners, shareholders, officials, potential customers, prospective employees, trainees, visitors, suppliers, corporate employees, and other third parties with whom the Company has business relationships.
<b>Deletion of Personal Data</b>	refers to make personal data non-accessible and unavailable to the relevant users.
<b>Regulation on Destruction</b>	refers to the Regulation on the Deletion, Destruction or Anonymization of Personal Data published in the Official Gazette with the journal number of 30224 on October 28, 2017 and entered into force as of 1 January 2018.
<b>Destruction of Personal Data</b>	refers to the process of making personal data inaccessible, non-retrievable and re-usable by anyone.
<b>PDP Law</b>	stands for Personal Data Protection Law which is published in the Official Gazette with the journal number of 29677 on April 7, 2016.
<b>the PDP Authority/the Board</b>	refers to the Personal Data Protection Authority.

<b>Periodic Destruction</b>	refers to the process of deletion, destruction or anonymization to be performed at repeated intervals in the event that all the processing conditions of the personal data in the law are eliminated.
<b>Policy</b>	refers to this Personal Data Processing and Protection Policy of Haksan Otomotiv Mamulleri San. Ve Tic. A.Ş.
<b>Sensitive Personal Data</b>	is the personal data regarding 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 as sensitive personal data.
<b>(our) Company/ HAKSAN</b>	stands for Haksan Otomotiv Mamulleri San. ve Tic. A.Ş.
<b>Data processor</b>	is defined as real or legal persons outside the organization of the Data Controller who process the personal data on behalf of the Data Controller based on his authority. These persons are a separate natural or legal person who processes the personal data in accordance with the instructions given to him, authorized by the data Controller through a personal data processing contract.
<b>Data Controller</b>	refers to the real or legal person who determines the purposes and means of the processing of personal data, and who is responsible for establishment and management of the filing system.
<b>Communique on Application to Data Controller</b>	refers to Communiqué on Procedures and Principles of Application to the Data Controller published in the Official Gazette with the journal number of 30356 on March 10, 2018.
<b>Regulation on The Registry of Data Controllers</b>	refers to the Regulation published in the Official Gazette with the journal number of 30286 on December 30, 2017.

## **ARTICLE 1 – PURPOSE AND SCOPE OF THE POLICY**

The main purpose of this Policy is to explain the activities and protection systems regarding the personal data that is processed and operated in accordance with the relevant legislations within the Company itself and its subsidiaries and to inform the data subject in this regard. Accordingly, our aim is to provide transparency by informing persons whose personal data are processed by our Company, especially employees, visitors, shareholders; third parties with potential customers and suppliers.

The provisions of this Policy includes any and all personal data of the current and potential clients, suppliers, Company's shareholders, employees and job applicants, our guests and the other firms' employees, shareholders or the other third parties to whom our Company work with, which is processed within our company and its subsidiaries by fully or partially through automatic means; or provided that the process is a part of any data registry system through non-automatic means.

## **ARTICLE 2 – FUNDAMENTAL PRINCIPLES**

Our company is aware that the personal data that is processed in order to ensure legal compliance must comply with the general principles and provisions set out in accordance with the Constitution, the PDP Law and other relevant legislation. In this regard, the fundamental principles of all personal data processing activities are always taken into consideration within the scope of Article 4 of the PDP Law:

During the processing personal data, the following principles shall be complied with:

- i. **Principle of being in conformity with the law and good faith:** In the processing of personal data, our Company acts in accordance with the principles set forth in the legal regulations and the general rules of trust and honesty.
- ii. **Principle of being accurate and if necessary, up to date:** Our Company has established the necessary systems to ensure that the personal data handled by considering the fundamental rights of data subject and their legitimate interests are accurate and up to date.
- iii. **Principle of being processed for specified, explicit, and legitimate purposes:** Before and during the processing of personal data, our Company processes personal data in a clear way and in the frame of lawful and contractual purposes.
- iv. **Principle of being relevant, limited and proportionate to the purposes for which data are processed:** The personal data processed is limited to adequate, on-site and necessary, with respect to legal regulations, contractual provisions and purposes set forth by the company policy. Within the framework of this basic principle, our company has minimized the processing of personal data.
- v. **Principle of being stored only for the time designated by relevant legislation or necessitated by the purpose for which data are collected:** HAKSAN has determined the time to be kept while processing personal data within the scope of Article 9 of the Regulation on The Registry of Data Controllers. In this regard, the following issues are taken into consideration when determining the retention periods:
  - o The durations that is accepted in common practice in the automotive sector which HAKSAN operates in.
  - o The duration which requires processing of personal data that takes place in the related category and the duration which the legal relationship established with the concerned person will proceed.
  - o The duration in which HAKSAN's legitimate interest will be valid in accordance with the rules of law and honesty depending on the purpose of processing the relevant data category,

- The duration which the risk, cost and responsibilities arises from the data storage will proceed legally, depending on the purpose of processing the relevant data category
- Whether the maximum time to be determined is appropriate for keeping the relevant data category accurate and up to date when necessary,
- The time required to store the personal data in the relevant data category due to the legal obligation of the data controller,
- The time-out period determined by the data controller for the provision of a right to personal data in the relevant data category.

## **ARTICLE 3 – PERSONAL DATA PROCESSING**

### ***3.1 General Explanations***

Any personal data processing activity that will be carried out by our company by means of obtaining, registering, storing, changing, reorganizing, disclosing, transferring, inheriting, making it available, classifying or preventing the use of personal data will be carried out by our company in accordance with Article 4 of the PDP Law.

Our company performs data processing activities in accordance with the personal data processing requirements stipulated in Article 5 of the PDP Law. Prior to processing, the Company informs the Data subjects in accordance with the procedures and principles that are set forth in Article 10 of the PDP Law and the Communiqué on Obligation to Inform, and upon the request of the Data subject, necessary information shall be provided with due diligence by our Company. The minimum requirements for the obligation to inform are regulated within the scope of Article 10 of the PDP Law:

- The identity of our Company as data controller and if any, its representative,
- The purposes for which personal data will be processed,
- The persons to whom processed personal data might be transferred and the purposes for the same,
- The method and legal cause of collection of personal data,
- The rights of data subjects.

In this respect, personal data collection channels will be determined by our Company in the first place and lighting points and texts for each of the channels will be determined.

Pursuant to Article 5 of PDP Law, personal data shall not be proceeded without the explicit consent of data subject. However, the personal data may be processed without obtaining the explicit consent of the data subject if one of the below conditions exists:

- i. It is expressly permitted by any law;
- ii. It is necessary in order to protect the life or physical integrity of the data subject or another person where the data subject is physically or legally incapable of giving consent;
- iii. It is necessary to process the personal data of parties of a contract, provided that the processing is directly related to the execution or performance of the contract;
- iv. It is necessary for compliance with a legal obligation which the controller is subject to;
- v. The relevant information is revealed to the public by the data subject herself/himself;
- vi. It is necessary for the institution, usage, or protection of a right;
- vii. It is necessary for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the data subject are not harmed.

Our Company complies with the data processing requirements stipulated in Article 6 of the PDP Law for personal data. For the processing of these data, it performs the necessary procedures within the framework of the decisions taken by the PDP Authority.

HAKSAN acts in accordance with Articles 8 and 9 of PDP Law and the decisions relating to the data transfer set forth by PDP Authority.

### **3.2. Purposes of Personal Data Processing**

Our Company processes personal data in accordance with the following limited conditions and purposes in accordance with Article 5 and 6 of the PDP Law.

execution of emergency management processes	internal audit/ investigation / execution of intelligence activities
execution of information security processes	conducting communication activities
execution of employee candidate / trainee selection procedures	planning of human resources planning
execution of application processes of employee candidates	execution and control of business activities
execution of employee satisfaction and loyalty processes	execution of occupational health / safety activities
fulfillment of contractual and regulatory obligations for employees	taking and evaluating recommendations for improving business processes
execution of side benefits and benefits for employees	ensuring business continuity activities
auditing / conduct of ethical activities	conducting logistics activities
execution of educational activities	execution of after-sales support services
execution of access powers	execution of sales of goods / services
appropriate implementation of activities in accordance with legislation	execution of goods / services production and operation processes
execution of financial and accounting works	conducting customer relationship management processes
implementation of commitment to company / product / services	conducting activities for customer satisfaction
ensuring the safety of physical space	organization and event management
the execution of the assignment process	conducting marketing analysis studies
follow-up and execution of legal affairs	performing performance evaluation processes
tracking requests / complaints	conducting advertising / campaign / promotion activities
securing movable goods and resources	execution of risk management processes
implementing supply chain management processes	execution of storage and archive activities
implementation of wage policy	social responsibility and execution of civil society activities
conducting marketing activities of products / services	conducting of the process of contract
securing of data controllers' operations	conducting of strategic planning activities
residence permits and work permits of foreigners	giving information to authorized persons, institutions and organizations
execution of investment processes	the execution of management activities
carrying out the activities of talent / career development	creation and monitoring of visitor records

In the event that the conditions for processing in this article 3/1 are not supplied, HAKSAN applies for the explicit consent of the data subjects in order to carry out the personal data processing activity.

### **ARTICLE 4 – PROCESSING OF SENSITIVE PERSONAL DATA**

Pursuant to Article 6/1 on PDP Law, Sensitive Personal Data is defined as personal data relating to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of association, foundation or trade-union, health, sexual life, criminal conviction and security measures, and biometrics and genetics. In the case of illegal processing of these data, a special meaning has been assigned to these data due to the risk of serious victimization or discrimination of the data subject.



In this respect, our Company has a special sensitivity to the protection of all kinds of data referred to as "Sensitive" and private personal data which are processed in accordance with the law. We would like to indicate that Sensitive Personal Data are not being processed within the scope of our Company's main activity. According to the provisions regarding the workplaces categorized as dangerous within the scope of the Labor Law and relevant regulations, only health information and if necessary, criminal records are being processed by our Company.

The technical and administrative measures that are taken in accordance with Article 5 of this Policy are also carefully applied in respect to Sensitive Personal Data and necessary supervisions are carried out by HAKSAN. In addition to those explanations, organised, clearly identified, manageable, sustainable and separate policies and procedures for sensitive personal data protection are applicable according to the decision numbered 2018/10 and dated 31/01/28 of the PDP Authority, namely, "Adequate Measures to be Taken by the Data Controller for the Processing of Personal Data".

Processing of the sensitive personal data by the Company Pursuant depends on whether the explicit consent of the data subject is taken or not in compliance with the applicable law and measures to be determined by the Authority. Accordingly, in principle; sensitive personal data are processed upon the explicit consent of the data subject. If data subject has no explicit consent, still, these data may be processed if:

- Personal data other than the health and sexual life of the data subject are processed as provided in the codes,
- Personal data concerning the health and sexual life of data subject are only processed by persons or authorities who are obliged to keep confidential in order to protect public health, protective medicine, medical diagnosis, treatment and maintenance services, plan and manage health services and finance.

#### **ARTICLE 5 – PERSONAL DATA PROTECTION**

Pursuant to Article 12 of the PDP Law, our Company is obliged to take all necessary technical and administrative measures to prevent the illegal processing and access of personal data and to ensure the proper security level in order to ensure the protection of personal data. In this respect, our company takes all necessary administrative and technical measures according to the nature of the data that are protected within possibility.

All personal data that are processed under HAKSAN is kept strictly confidential and access to such data is limited. No personal data that is not covered by the legal processing conditions in accordance with Article 5 and 8 of the PDP Law is shared with third parties.

HAKSAN is obliged to notify the data subject as soon as possible and to the PDP Authority as necessary if it is determined that the data will be acquired by third parties in violation of the law or good faith.

In case of the realization of the violation possibility and violation itself of the personal data security that may arise in relation to personal data processed by our Company, any loss to may be occurred shall be determined accurately and the appropriate technical and administrative measures shall be taken immediately. When these risks are detecting, the first phase to be made is to determine whether the personal data is

- (i) sensitive personal data or not,
- (ii) the level of privacy required by the ordinary course, and
- (iii) the nature and quantity of the damage that may occur in the case of data security breaches.

After identifying and prioritizing these risks, there are controlling and solution alternatives to reduce or eliminate such risks shall be evaluated in accordance with the cost, feasibility and usefulness

principles; and necessary additional technical and administrative measures shall be planned and put into practice.

The main technical and administrative measures taken considering all these explanations are as follows:

- a. All activities carried out within HAKSAN have been analysed in detail in all departments and a "personal data inventory" has been prepared. The risk areas in this data inventory are determined and necessary legal and technical measures are taken within the scope of facilities.
- b. Technical and software support and consultancy are provided outside the company regarding technical issues. Necessary measures have been taken with these suppliers regarding confidentiality agreements and data processing obligations.
- c. Personal data processing activities carried out by HAKSAN are controlled by information security systems, technical systems and legal methods.
- d. Employees shall be informed regarding the protection of personal data, legal and personal data processing in accordance with law. Additionally, seminars regarding the current amendments and internal company policies on this subject may be organized, if necessary.
- e. Within the scope of the organization scheme, in order to meet the legal compliance requirements within the scope of the PDP Law, awareness will be increased and the applicable rules will be determined for the relevant departments. The necessary administrative measures shall be taken to ensure the continuity of the practice and audit of these legal compliance through in-house policies and information.
- f. In accordance with the legal relationship between HAKSAN's business partners, customers, suppliers and employees, the terms and conditions for the processing, privacy and retention of personal data have been added to the agreements and important documents are signed or will be signed.
- g. The agreements entered into by HAKSAN with persons to whom personal data has been transferred have been amended and the provisions regarding the taking of security measures necessary for the protection of personal data have been added and put into force.
- h. The files/outputs stored in the physical environment are stored through the supplier companies working and then destroyed according to the procedures determined.
- i. Personal data processing activities performed in our company are controlled by established and updated technical systems. These technical measures are audited by the company authorities within the framework of internal audit systems determined by our company.
- j. Access to personal data is limited to employees to be determined in accordance with the reason for processing personal data. Access to personal data that employees do not use as required by their duties has been abolished.
- k. Taking into account the evolving and changing technology, appropriate technical measures have been taken to prevent access to the systems and locations where personal data is stored and the measures taken within this scope are updated with certain intervals.
- l. Software and hardware including virus protection systems and firewalls are installed and updated periodically.
- m. For each department, the technical processes of access and authorization are designed and carried out. As a result of these studies, access privileges are regularly reviewed

- n. Backup programs are used to secure the storage of personal data.
- o. All HAKSAN employees are committed to not disclosing, exposing or using any personal data they have learned to a third party in violation of the provisions of the PDP Law. This commitment will continue in cases where the business relationship with the company and its employees has ended.

## **ARTICLE 6 – MONITORING ACTIVITIES WITH SECURITY CAMERAS**

Due to the purpose of the providing security by HAKSAN, monitoring activities with security cameras in buildings and facilities of the Company have been making for entrance and exit of the guests in particular areas. Information on monitoring activities with security cameras are in the signs under the cameras and on our website. The monitoring activities with security cameras have been operating in compliance with the Constitution, PDP Law, provisions of this Policy and general principles of law. Whereas:

### ***6.1. The purpose of the monitoring activities with security cameras***

Our Company acts in a limited and measured manner in connection with the purpose for which it is treated with certain and legitimate aims while the monitoring activities with security cameras, personal data processing in compliance with general principles of law and good faith regulated into article 4 of the PDP Law.

Our company acts in compliance with the principles of being relevant, limited and proportionate to the purposes for which data are processed and being in conformity with the law and good faith stipulated in Article 4 of the PDP Law while monitoring activities.

In order to ensure the security of the physical space, to protect the production and trade secrets of the Company, to secure the company's data, to secure the life and property of the data subject and other persons, and to protect the interests of both the data subjects and the Company, the data processing is conducted by HAKSAN through recording to the data system automatically.

Our company has 40 security cameras in total. We reserve the right to change the number of security cameras according to the needs of our company. Security camera recording zones are strictly limited and are determined by our Company for the purpose of monitoring the security camera. Security camera recording zones are limited to areas where security risk is high.; building and facility entrances, corridors, dining hall, production site, etc. meeting rooms, offices, restrooms and dressing rooms are excluded from the security camera recording zones.

Monitoring activities with security camera are essential for both reasons to provide the security of our employees of Company, our customers, our suppliers and others related to our Company and to protect our Company's trade secrets and customer interests.

As all these purposes stated above, our company's security camera recording system is active for 7 days 24 hours.

### ***6.2. Authorized persons to access***

Access to security camera records stored on digital media is restricted to those authorized by our Company and the records shall only be viewed from their computer or monitors.

Security camera records are accessible to the head of Human Resources Department and authorized assigned by the head of Department. Security officers at the entrance of the car park monitor live and instantaneously to ensure guest check-in and check-out.

A limited number of persons having access authorization to the security records declare that they will protect the confidentiality of the data they receive through business contracts, internal policies, safety regulations and confidentiality contracts.

### ***6.3 The persons whom the data are transferred regarding the records to***

Security camera records shall only be shared with law enforcement officers and relevant judicial authorities through CD or external memory, when necessary or upon the request.

### ***6.4. The retention period of records***

Our Company shall keep the security camera records for 15 days and they are automatically deleted every month by the method of recording them onto the same digital platform for the camera recordings.

## **ARTICLE 7 – OBLIGATION TO REGISTER TO THE REGISTRY OF DATA CONTROLLERS**

HAKSAN will be registered with Data Controllers' Registry by September 30, 2019, which is determined and announced by the PDP Authority. The information and documents excluding the additional requirements of the PDP Authority, are stated as follows:

- ✓ Identity and address information of the HAKSAN as data controller and of the representative thereof, if any.
- ✓ The purposes for which personal data will be processed.
- ✓ The group or groups of persons subject to the data and explanations regarding data categories belonging to these persons.
- ✓ Recipient or groups of recipients to whom personal data may be transferred.
- ✓ Personal data which is envisaged to be transferred abroad.
- ✓ Measures taken for the security of personal data.
- ✓ The maximum period necessitated by the purposes for which personal data are processed.

## **ARTICLE 8– TRANSFER OF PERSONAL DATA**

Transferring personal data shall be legitimate and justifiable in accordance with data subject's explicit consent or provided that enough precautions are taken, data processing requirements regulated under the Article 5 of the PDP Law by referring the Article 6/3 of the PDP Law and other regulation. HAKSAN shall transfer the personal data within these principles and conditions stipulated under the article 2 of this Policy.

In addition to these, personal data may be transferred abroad by having the explicit consent of the data subject or without obtaining any explicit consent of the data subject if one of the data processing condition regulated under the Article 5 of the PDP Law by referring the Article 6/3 of the PDP Law and other regulation provided that enough precautions are taken. If the foreign country to whom personal data will be transferred has an adequate level of protection, personal data may be transferred. In case there is not an adequate level of protection, if the data controllers in Turkey and abroad commit, in writing, to provide an adequate level of protection and the permission of the Board exists.

Our company can transfer private personal data to Turkey or abroad by taking the necessary care and taking the necessary security precautions, including the methods prescribed by PDP Law, in line with the data processing purposes in accordance with the law, if the following conditions exist:

- i. Private personal data other than healthcare and sexual life may be transferred in cases where the data owner gives explicit consent or is expressly required by law without seeking explicit consent.
- ii. personal data relating to health and sexual life may be transferred in cases where the data subject gives explicit consent or without seeking explicit consent of the data subject, by persons or authorities who are under a confidentiality obligation for the protection of Public Health, Preventive Medicine, medical diagnosis, treatment and maintenance, planning and financing of health services and for the purposes of protecting public health.

## **ARTICLE 9 – DESTRUCTION OF PERSONAL DATA**

Pursuant to Article 138 of the Turkish Criminal Code numbered 5237 and Article 7 of PDP Law, in case of the elimination of processing reasons of the personal data even though data has been processed on the legitimate grounds and in accordance with the law, these personal data shall be deleted, destroyed or anonymized. This process shall be operated upon request of the data subject or by approximation of HAKSAN itself. In this respect, a "Personal Data Retention and Destruction Policy" has been prepared by our Company to contain the principles and procedures of deletion, destruction or anonymization of personal data.

In accordance with this Destruction Policy, HAKSAN has right not to fulfil the request of the data subject in the event that right and/or obligation to retain personal data pursuant to the relevant codes.

## **ARTICLE 10 – DATA PROTECTION OFFICER AND THE CONTACT PERSON**

A Data Protection Officer and a Contact Person have been assigned to enable our Company to communicate better with the data subject and the Board in order to fulfil the obligations under the PDP Law more quickly and more accurately.

## **ARTICLE 11 – RIGHT TO APPLY OF DATA SUBJECTS**

Data subjects may apply to our Company, as the data controller, to exercise certain rights stipulated under Article 11 of the PDP Law. Therefore, the data subjects have the right to:

- Learn whether her/his personal data have been processed;
- Request information as to processing if her/his data have been processed;
- Learn the purpose of processing of the personal data and whether data are used in accordance with their purpose;
- Know the third parties in the country or abroad to whom personal data have been transferred;
- Request rectification in case personal data are processed incompletely or inaccurately;
- Request deletion or destruction of personal data within the framework of the conditions set forth under article 7;
- Request notification of the operations made as per indents (d) and (e) to third parties to whom personal data have been transferred;
- Object to occurrence of any result that is to her/his detriment by means of analysis of personal data exclusively through automated systems;
- Request compensation for the damages in case the person incurs damages due to unlawful processing of personal data.

Data subjects may exercise above-mentioned rights by filling in the "Application Form" on the website of our Company (<http://www.haksanotomotiv.com/tr>) and accessing our company through the channels stated in this Application Form.

Applications submitted by data subjects will not be taken into consideration as a result of the failure to comply with the application procedure provided for in the application form in accordance with Article 13 of the PDP Law.

Our company may reject the application of the applicant with the reasons in the following cases:

- Processing of personal data by judicial authorities and execution agencies regarding investigation, prosecution, adjudication or execution procedures
- Processing of personal data for the purposes of art, history, and literature or science, or within the scope of freedom of expression, provided that national defence, national security, public safety, public order, economic safety, privacy of personal life or personal rights are not violated.

- Processing of personal data within the scope of preventive, protective and intelligence-related activities by public institutions and organizations who are assigned and authorized for providing national defence, national security, public safety, public order or economic safety.
- Processing of personal data for purposes such as research, planning and statistics through anonymization with official statistics.
- Processing of personal data is necessary for prevention of crime or investigation of a crime.
- Processing of personal data revealed to the public by the data subject herself/himself.
- Processing of personal data is necessary, deriving from the performance of supervision or regulatory duties, or disciplinary investigation or prosecution by assigned and authorized public institutions and organizations and professional organizations with public institution status.
- Processing of personal data is necessary for the protection of economic and financial interests of the state related to budget, tax, and financial matters.
- The request of the owner of personal data is likely to block the rights and freedoms of others.
- Requests for disproportionate effort have been made.
- If the information requested is public information.

#### **ARTICLE 12 – EXECUTION OF THIS POLICY AND RELEVANT REGULATION**

The purpose of this Policy is to embody the rules stipulated by the PDP Law and other relevant regulation. This Policy is set of rules that conducts the methods and guiding regarding the personal data in order to serve the mentioned purpose. Having said that, our Company shall take this Policy into consideration as a guide to analyse the data processing activities, determine all necessary actions and take all necessary administrative and technical measures. With the initiation of the action, the internal audit system will be operated and the compliance with this Policy will be ensured and this compliance will be maintained. In addition to the internal audit practice, organizations to ensure the awareness of the employees will be arranged, necessary orientations shall be implemented for the newly incorporated employees of our Company, and necessary arrangements will be made in relation to the subsidiaries and business partners of our company.

Legal regulations in force concerning the processing and protection of personal data shall apply as a priority within HAKSAN. However, if there is any discrepancy or contrariety between the applicable legislation and this policy, our Company agrees that the applicable legislation will be applicable.

This Policy is embodied within the framework of the applicable law and HAKSAN practices of the rules. Our company still operate any necessary system and preparations to act in accordance with the prescribed periods within the scope of PDP Law.

**HAKSAN OTOMOTİV MAMULLERİ SAN. VE TİC. A.Ş**  
**MANAGING BOARD**