

BOZLU HOLDING A.S.
INFORMATION TEXT ON PROTECTION OF PERSONAL DATA

We, as Bozlu Holding A.S. (“Bozlu Holding”/“Company”/“Data Controller”), acting as the Data Controller, hereby would like to inform you about the Law Nr. 6698 on Protection of Personal Data (the "LPPD"), which has been promulgated on the Official Journal, dated April 7, 2016 with the issue number 29677, in order to protect particularly the right of privacy and the fundamental rights and freedoms of individuals with respect to processing of any personal data as well as to determine the obligations of the real or legal persons, who process the personal data, pursuant to the Article 10 “Data Controller’s Obligation to Provide Information”.

Any information about how personal data is processed by Bozlu Holding is provided under the headings.

a) About Data Controller

Bozlu Holding pays special attention to protection and security of the personal data; accordingly, it takes the necessary technical and administrative measures required to ensure that any and all kinds of personal data of any and all real persons with respect to Bozlu Holding are processed and kept legally in accordance with the LPPD.

The personal data are processed by Bozlu Holding in the capacity of “data controller” in accordance with the LPPD. The real persons, whose personal data are processed in accordance with the LPPD, may review this information text, and they may obtain information about the personal data collected by Bozlu Holding in the capacity of data controller, and the purposes of processing thereof, and the persons, to whom such personal data may be transferred, and the method of collection thereof, and the legal reason thereof, and also its rights for such personal data.

b) Purposes of Processing Personal Data

The personal data are processed for legitimate interest of Bozlu Holding verbally, in writing or electronically through the website and similar means by using the automatic or non-automatic methods in order to achieve the following purposes in compliance with the LPPD and other relevant regulations as well as with our Policy for Protection and Processing of Personal Data, in the cases as prescribed explicitly under the regulations in compliance with the provisions prescribed under the Sections 5 and 6 of the LPPD, and to the extent that it shall directly or indirectly relate to establishment or performance of any agreement, and in the event that it is required to process the personal data of the parties to the agreement, and also in a manner not to damage the fundamental rights and freedoms of the concerned person.

The purposes of processing of the personal data may be updated based on our Company policies and our obligations arising from the regulations, and they include the following processing purposes:

- Carrying out the application processes for the employee candidates who file an application to the Company;
- Fulfilling the obligations arising from contract of employment and regulations with respect to the employees of the Company;

- Carrying out the processes for the benefits and interests of the employees of the Company;
- Planning and performing the training activities of the employees;
- Planning and performing the employees' authorization for access to information;
- Monitoring and supervising the business activities of the employees;
- Recruiting any personnel appropriate for the vacant positions in compliance with the human resources policies of the Company in order to ensure execution of the human resources policies, and executing the human resources operations;
- Fulfilling the obligations under the Occupational Health and Safety, and taking the necessary measures for such purpose;
- Planning and performing information security processes and set up and manage IT infrastructure;
- Monitoring the finance and/or accounting and legal affairs;
- Planning and performing the necessary operational activities required to ensure that the activities of the Company are carried out in compliance with the Company procedures and/or the relevant regulations;
- Providing the physical space security;
- Fulfilling the legal and regulatory requirements,
- Providing any information to the competent persons and/or authorities due to the regulations;

The following principles are followed during processing of the personal data:

- Compliance with the laws and good faith;
- Being accurate, and up-to-date if and when so required;
- Being processed for specific, explicit and legitimate purposes;
- Being associated with, and limited to the purpose, for which they are processed, and also being moderation;
- Being retained during the period of time either prescribed under the applicable regulations or required for the purpose, for which they are processed.

c) Personal Data Sharing and Transfer

In respect of transfer of the personal data, the Company has the responsibility for acting in compliance with the provisions as prescribed under the LPPD, and with the resolution adopted by the Personal Data Protection Committee, and also with the applicable regulations.

Your personal data collected may be transferred to the following persons/organizations/institutions to the extent that it shall be limited to achievement of the purposes as specified above:

- The Company's national and international business partners, shareholders, national and international suppliers, national and international community companies;
- The persons or organizations as permitted by the provisions prescribed under the Turkish Commercial Code, Turkish Code of Obligations and other laws and regulations;
- The statutorily competent public authorities and institutions, and the administrative and statutory authorities;
- The real or legal persons, from which the Company procures service with respect to the product/services, and with whom the Company cooperates;

in accordance with the personal data processing requirements and purposes as specified under the Sections 8 and 9 of the Law Nr. 6698.

The Company may not transfer any personal and private data of the concerned persons to the other real or legal persons without the explicit consent of the concerned person. In so far, the data may be transferred to the authorized administrative or judicial institution or organization without the explicit consent of the concerned person in accordance with and subject to the limitations as prescribed under the regulations, if and when required by the LPPD and other laws.

However, the transfer is also possible without the consent of the concerned person in the cases as prescribed under the Sections 5 and 6 of the LPPD. In the event that any agreement has been executed with the data owner, then the Company may transfer the personal data to the 3rd persons, situated in the Republic of Turkey, in compliance with the requirements as prescribed under the LPPD and other applicable regulations provided that it shall take any and all security measures for such purpose, unless otherwise set out under such agreement, the LPPD or the other applicable regulations.

The personal data are/may be transferred to the foreign countries (“Foreign Countries with Sufficient Level of Protection”), which are announced by the PDP Board to have the sufficient level of protection, or otherwise to the foreign countries (“Foreign Countries with Sufficient Data Controller Committing to Attain Sufficient Level of Protection”), in which the data controllers available in Turkey and the respective foreign country have committed, in writing, to ensure that a sufficient level of protection would be attained, and which are permitted by the Personal Data Protection Committee. Accordingly, our Company acts/will act in compliance with the regulations as prescribed under the Section 9 of the LPPD and with the statutory regulations.

d) Methods for Collection of Your Personal Data and Legal Grounds Thereof

The personal data are collected verbally, in writing or electronically for the purposes as provided above, and they are processed and transferred in accordance with the Sections 5 and 6 of the LPPD.

e) Your Rights Arising from the Law on Your Personal Data

Your rights with respect to your personal data are provided as follows pursuant to the Section 11 of the LPPD:

- to inquire whether your personal data have been processed, or not; and
- to request information with respect thereto in the event that your personal data have been; and
- to be informed about the purpose of processing of your personal data, and also about the fact that whether such personal data have been used in compliance with the intended use thereof; and
- to be informed about the national and international third persons, to whom/which your personal data has been transferred; and
- to request correction of your personal data in the event that they have been processed incompletely or inaccurately; and
- to request deletion or disposal of your personal data in accordance with the requirements prescribed under the Section 7 of the LPPD; and

- to request that the third persons, to whom your personal data are transferred, are notified of the processes carried out pursuant to your rights for deletion, correction and disposal of your personal data as specified above; and
- to raise an objection against emergence of an outcome that is to the detriment of the concerned person upon the exclusive analysis of any data processed by means of the automatic systems; and also
- to claim for compensation of any damage and/or loss that might have been incurred due to the fact that your personal data has been processed in breach of the LPPD and applicable regulations.

f) Method for Exercise of Your Rights Arising from the Law on Your Personal Data

In respect of your request for exercise of your rights as specified above, after you complete the “[Bozlu Holding A.S.-Application Form](#)” available in the web address www.bozlu.com , you may send such form:

- i. to the address “19 Mayıs Mah. Dr. Sevket Bey Sk. No: 5 Sisli Istanbul, by cargo along with a petition, which bears your original signature, and which bears the statement “Request for Information under the Law on Personal Data Protection” on the envelope;
- ii. through the agency of any notary public; and/or
- iii. to bozluholdingas@hs01.kep.tr through the electronic mail address registered or your electronic mail address registered our system in a manner to bear the secure electronic or mobile signature.

g) Replying to your application

The applications to be filed accordingly will be concluded within the possibly shortest period of time and within a period of 30 days on maximum basis.

h) Your Right to File a Complaint to the Personal Data Protection Committee

In the event that your application is rejected, or that the reply is found to be insufficient, or that the application is not replied in due course of time, then you may file a complaint to the Personal Data Protection Committee within a period of thirty days as of the date, on which you are informed about our reply to your application, and within a period of sixty days as of the date of application in any case.