POLİN GROUP COMPANIES
PERSONAL DATA PROCESSING AND PROTECTION POLICY

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FIRST PART

§ 1. INTRODUCTION

1.1. Scope of the Policy

This Policy has been issued to determine the requirements to be fulfilled in terms of processing and protection of the personal data by all group companies within the body of Polin Group legally under the Personal Data Protection Law No. 6698 (''Law'').

This Policy is binding and guiding for all group companies affiliated to Polin Group.

Polin Group Companies cover other domestic and overseas companies and/or establishments that Polin Holding A.Ş. or any shareholder of Polin Holding A.Ş., particularly Polin Holding A.Ş., Polin Su Parkları ve Havuz Sistemleri A.Ş., Futuraform Kompozit ve Reklam Ürünleri San. ve Tic. A.Ş., Polin Dış Ticaret A.Ş., Polin Park Servis Hizmetleri A.Ş., holds a share currently and/or any of these will establish in the future, become shareholder, or take part in the management. Each of the group companies will be defined as ("Company") in the implementation of this Policy.

1.2. Purpose of the Policy

The primary purpose of this Policy is to make statements on the systems devoted to personal data processing and protection legally and in compliance with the law and to determine the general procedures and principles to be followed to conduct the personal data processing activity concerning all person groups, particularly company stakeholders, company officials, company business partners, employees, employee candidates, visitors, company customers, potential customers and third parties in this regard.

1.3. Field of Application of the Policy and Personal Data Subjects

This Policy shall be applied for all person groups, particularly company stakeholders, company officials, company business partners, employees, employee candidates, visitors, company customers, potential customers, and third parties whose personal data are processed by the Company through automatic or non-automatic means provided to be a part of any data filing system. In no way, this policy is applied to legal entities and legal entity data.

For the Company's employees, the Policy on Processing and Protection of Personal Data of the Employees shall be applied.

If the data processed is not within the scope of "Personal Data'' given below, this Policy is not applied.

In this regard, the personal data subjects within the scope of this policy are as follows:

Company Stakeholder	**:**	Natural persons representing the legal entity being stakeholders of the Company.
Natural Person Business Associate of the Company	**:**	Natural persons with whom the Company is in all kinds of business relationships.
Shareholder, Official, Employee of Company's Business Associates	**:**	Natural persons including employees, shareholders, and officials of the natural persons and legal entities (business associate, supplier, etc.) with whom the Company is in all kinds of business relationships.
Company Officials	**:**	Company's board members and other authorized natural persons.
Employee Candidate	**:**	Natural persons who have made a job application to the Company in any way or opened the relevant information for the examination of the Company.
Company Customer	**:**	Natural persons that use or have used the products and services rendered by the Company regardless of whether they have a contractual relationship with the Company or not.
Potential Customer	**:**	Natural persons who have made a request or showed interest in using the products and services of the Company or considered to have this interest in compliance with the custom of trade and good faith.
Visitor	**:**	Natural persons who entered into physical premises of the Company for various purposes or visited its websites for any purpose.
Third-Party	**:**	Other natural persons that are not included in any category of the personal data subject within the Scope of Policy on Processing and Protection of Personal Data of the Employees prepared for Employees and this Policy.

1.4. Definitions

The terms used in this Policy refers to the following meanings:

Company	**:**	Refers to relevant Polin Group company to which the Policy will be applied.
Group Company	**:**	Polin Group Companies cover other domestic and overseas companies and/or establishments that Polin Holding A.Ş. or any shareholder of Polin Holding A.Ş., particularly Polin Holding A.Ş., Polin Su Parkları ve Havuz Sistemleri A.Ş., Futuraform Kompozit ve Reklam Ürünleri San. ve Tic. A.Ş., Polin Dış Ticaret A.Ş., Polin Park Servis Hizmetleri A.Ş., holds a share currently and/or any of these will establish in the future, become shareholder, or take part in the management.
Personal Data	**:**	Refers to all kinds of information concerning an identified or identifiable natural person.
Special Categories of Personal Data	**:**	Refers to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data.
Personal Data Processing	**:**	Refers to all kinds of transactions conducted on the data such as acquiring the personal data through fully or partially automatic means or non-automatic means provided to be a part of any data recording system and recording, storing, retaining, changing, reorganizing, disclosing, transferring, taking over, making acquiring, classifying or preventing the use of these personal data.
Personal Data Subject	**:**	Refers to a natural person whose personal data are processed.
Data Filing System	**:**	Refers to a recording system where personal data are configured and processed depending on specific criteria.

Data Controller	**:**	Refers to a natural person or legal entity responsible for the installation and management of the data recording system determining the purposes and methods of personal data processing.
Data Processor	**:**	Refers to a natural person and legal entity processing the personal data based on the authority given by the data controller.
Explicit Consent	**:**	Refers to any free and informed consent given with respect to a specific issue.
Making Public	**:**	Refers to making the data that have been associated with any person beforehand impossible to associate with an identified or unidentifiable natural person in any way even by matching them with other data.
Law	**:**	Refers to the Personal Data Protection Law No. 6698.
Board	**:**	Refers to the Personal Data Protection Board.

1.5. Enforcement of the Policy

This Policy has been issued and entered into force on 31/12/2019.

SECOND PART

§ 2. PERSONAL DATA PROCESSING AND TRANSFER

2.1. General Principles for Personal Data Processing

The Company processes the personal data in compliance with the procedures and principles foreseen in the law and this policy. The Company acts with the following principles when processing personal data:

- The personal data are processed in conformity with the law and the principle of bona fide.
- It is ensured that personal data are **accurate** and when necessary **up to date**. In this regard, the aspects such as determining the sources from which the data are obtained, verifying their accuracy, and evaluating whether they are required to be updated or not are carefully taken into consideration.

- The personal data is processed for **specific, explicit, and legitimate purposes**. The legitimacy of the purpose means that the personal data processed by the company is related to and necessary for the business or service it provides.
- Personal data is related to the purpose to achieve the purposes determined by the company, and the processing of personal data that is not related to the realization of the purpose or is not required is avoided. It limits the processed data to the only achievement of the purpose. The personal data processed in this regard are **related, limited, and proportionate** to the purpose for which they are processed.
- If there is a period stipulated in the relevant legislation for the storage of data, it complies with these periods; otherwise, it retains personal data only **for the period necessary for the purpose for which it was processed.** If there is no valid reason for the further retention of personal data, this data is deleted, destructed, or anonymized.

2.2. Conditions of Personal Data Processing

The personal data is processed primarily if at least one of the following requirements is met.

- The Company may process personal data of personal data subjects even without explicit consent in cases stipulated by laws. To illustrate, under Article 230 of the Tax Procedure Law, the explicit consent of the data subject will not be required to include the person's name on the invoice.
- The personal data can be processed without explicit consent to protect the life or physical integrity of the persons who are unable to disclose their consent due to the actual impossibility or whose consent cannot be rendered valid or the life or body integrity of another person. For example, in a situation where the consent is not valid due to the person's unconsciousness or mental illness, the personal data of the personal data subject may be processed to protect the integrity of his/her life or body. In this regard, data such as contact data can be processed.
- The personal data belonging to contact parties can be processed, provided that it is directly related to the conclusion or performance of a contract. For example, the account number of the creditor can be obtained to pay the amount under a contract made.
- The company may process personal data of personal data subjects if it is necessary to fulfill its legal obligations as a data controller. For example, the explicit consent of the data subject will not be required in case the notice is made to the law enforcement officers under the Identity Notice Law.
- The personal data that is made public by the company itself, in other words, disclosed to the public in any way, can be processed since the legal benefit that is required to be protected is no longer valid.
- The Company may process personal data of personal data subjects without seeking explicit consent in cases where data processing is necessary for the

exercise or protection of a legitimate right. For example, personal data of the person to whom after-sales services are rendered can be processed.

- The Company may process the personal data of personal data subjects in cases where it is necessary to process personal data for the legitimate interests of personal data subjects provided not to damage their fundamental rights and freedoms protected under the law and policy. For example, the Company records images with a camera for security purposes. The company is obliged to comply with the basic principles regarding the protection of personal data and to show necessary sensitivity to the balance of interests of personal data subjects.

The occurrence of these conditions should be evaluated individually concerning the processing purpose in each processing activity.

In the absence of any of these conditions, the personal data are not processed without the explicit consent of the data subject.

2.3. Conditions of Processing Special Categories of Personal Data

The company does not process special categories of personal data without the explicit consent of the data subject. However, personal data other than health and sexual life may be processed without the explicit consent of the data subject in cases stipulated by the law.

In cases where data related to health and sexual life are to be processed, the Company has to apply to the law department and if there is no law department, it has to apply to a law office from which it gets support before starting the processing activity and thereby, to carry out the process in this direction.

In the processing of special categories of the personal data, the decisions of the Personal Data Protection Board are applied and the minimum-security measures specified in these decisions are taken.

2.4. Conditions of Personal Data Transfer

To transfer personal data to third parties residing in the country, the existence of processing conditions is also required for transfer. In the absence of any of these conditions for the transfer, the personal data cannot be transferred without the explicit consent of the data subject.

The existence of processing conditions for the processing of personal data alone does not mean that these conditions exist for transfer.

2.4.1. Conditions of Overseas Transfer of the Personal Data

The personal data can be transferred to countries having sufficient protection determined by the Board under the domestic transfer criteria. In the absence of these

criteria, personal data cannot be transferred without the explicit consent of the data subject.

If the transfer of personal data from countries having sufficient protection determined by the Board to another country is foreseen, the Company and the persons to be transferred in the foreign country shall undertake sufficient protection in writing and the Board's permission shall be obtained in this regard in addition to the above criteria before the relevant data transfer is initiated. In the absence of these criteria or the consent of the Board, the personal data cannot be transferred to a foreign country without the explicit consent of the data subject.

THIRD PART

§ 3. PURPOSES FOR PROCESSING AND TRANSFERRING OF THE PERSONAL DATA AND TO WHOM THEY WILL BE TRANSFERRED

3.1. Purposes for Processing and Transferring of the Personal Data

The personal data are processed within the scope of personal data processing conditions specified in the 5th and 6th articles of the Law limited to the following purposes and in compliance with the law and ratio legis.

- Management of judicial/administrative processes, responding to requests from public authorities, fulfilling legal obligations depending on legal regulations, resolving legal disputes,
- Benefiting from the main and vested benefits arising from the employment contracts of the company employees, evaluating their performance and works,
- Opening a user account for employees and giving an internal ID card,
- Creating the attendance and certificate records of the employees,
- Event management,
- Execution/follow-up of financial reporting and risk management processes,
- Planning and execution of audit activities to ensure that the activities of the Group Companies are carried out in compliance with the relevant legislation,
- Supporting Group Companies' personnel recruitment processes and compliance with the relevant legislation,
- Supporting Group Companies in the realization of corporate and partnership law transactions,
- Planning and implementation of human resources policies in the best way and carrying out personnel recruitment processes,

- Establishing contact/communication with existing and potential customers, suppliers, business and solution partners, and consultants from whom products and services are purchased, and conducting commercial relations and reporting,
- Establishment, execution, and termination of the business relationship/contract,
- Supporting the planning and execution processes of the vested benefits and benefits to be provided to the personnel and managers of the Company and Group Companies,
- Contacting personal data subjects who submit their requests and complaints to them and ensuring the request and complaint management,
- Ensuring the legal, commercial and physical security of the Company and Group Companies,
- Negotiation, conclusion, and performance of contracts,
- Customizing the offered products and services under the demands; updating and improving in line with the customer needs, legal and technical developments,
- Planning and execution of after-sales services,
- Creating a participant registration for participation in an organization on behalf of the company,
- Providing the transportation organization of company employees,
- Execution/follow-up of company legal affairs,
- Ensuring the internal and environmental security of the company and the security of the website,
- Offering products and rendering services,
- Payment of product, service and service fees, collection, determination of the method of collection,
- Creating databases,
- Announcing new or existing products, services, and campaigns, carrying out sales and marketing activities,
- Creating and tracking visitor records,
- Enabling third parties to perform their technical, logistics, and other similar functions as service providers on behalf of the Company.

If the processing activity conducted for the aforementioned purposes does not meet any of the conditions stipulated under the Law, explicit consent shall be obtained by the Company regarding the relevant processing process.

3.2. Persons to Whom Personal Data Can Be Transferred

Persons required to be shared for the performance of the service

The personal data can be shared with business and solution partners, banks, and third parties who perform technical, logistics and other similar transactions on behalf of the Company to ensure that the activities carried out by the Company and the products and services offered are complete and perfect, and only to the extent that it is suitable for this scope. These third parties are the persons who are obliged to have access to the relevant information to provide the products and services offered completely and flawlessly by enforcement of the activity.

Persons required to be shared under law

The personal data can be transferred to them only in cases the Company is obliged to make this transfer to fulfill its legal obligations or if it is stipulated in the laws or there is a judicial/administrative order given under the law, but the transfer shall be limited only to the relevant person or institution.

Consultants and auxiliary service providers

The personal data can be transferred to third parties from which support is got in areas such as storage, archiving, information technology support, security; to business partners, banks, financial institutions with whom we cooperate and/or get services; to law offices, consultancy firms, other related parties, and authorized institutions and organizations where a transfer is necessary for the specified purposes to protect the rights of the Company and/or the rights of the data subjects and to fulfill legal obligations and only if the data transfer is mandatory for the performance of these purposes.

FOURTH PART

§ 4. METHOD OF AND LEGAL REASON FOR PERSONAL DATA COLLECTION, DELETION, DESTRUCTION, AND ANONYMIZAION AND RETENTION PERIOD

4.1. Method of and Legal Reason for Personal Data Collection

The collection of personal data is also a processing activity. In this regard, the existence of a valid legal reason is required for the collection of personal data. The existence of at least one of the processing conditions of personal data or the explicit consent of the data subject is deemed a valid legal reason.

The personal data are collected only under the specified processing purpose, using methods that will not damage the fundamental rights and freedoms of the data subject.

4.2. Storage, Deletion, Destruction, or Anonymization of the Personal Data

The personal data are stored only related, limited, and proportionate to the purpose for which they are processed, for the period stipulated in the relevant legislation or required for the purpose for which they are processed.

These periods are determined in the personal data inventory of the Company, considering the nature of the relevant personal data, the purpose of processing, and the legal reason.

The personal data whose retention period has expired is deleted, destructed, or anonymized by the Company upon the request of the data subject and/or ex officio. The procedures and principles regarding deletion, destruction, or anonymization are determined in the Personal Data Storage and Destruction Policy.

FIFTH PART

§ 5. ASPECTS CONCERNING PERSONAL DATA PROTECTION

Under the Article 12 of the Law, the Company is obliged to take necessary technical and administrative measures to prevent illegal processing of the Personal Data, prevent unauthorized access to data, and ensure the appropriate level of security and in this regard, to carry out necessary audits or have these audits done.

5.1. Ensuring Security of the Personal Data

The Company is obliged to ensure the security of personal data. In this regard, the measures and solutions to be taken by the Company are determined by taking into account the nature of the personal data processed, the nature of the environments in which the processing activity takes place, and existing technological risks and developments. In this context, the Company is obliged to develop reasonable solutions against all risks identified.

The minimum measures to be taken by the company are listed below.

5.1.1. Minimum Administrative Measures

Identifying Current Risks and Threats

To ensure the security of the personal data, it is primarily necessary to correctly identify all personal data processed by the data controller, the probability of realization of the risks that may arise regarding the protection of these data, and the losses to be caused in case of realization, and appropriate measures should be taken.

While these risks are determined, the following aspects are considered:

- Whether personal data are belongs to special categories or not,
- The degree of confidentiality required by its nature,

- The nature and quantity of the damage that the data subject may suffer in case of breach of security

After identifying these risks and determining their priority, the control and solution alternatives to reduce or eliminate the mentioned risks and the cost is evaluated in line with the principles of applicability and usefulness. The necessary technical and administrative measures are planned and taken.

Training of Employees and Awareness Activities

The employees are provided with training on data security and protection of personal data, and the awareness activities are carried out for employees. It is ensured that everyone working within the company is aware of their roles and responsibilities regarding personal data security.

Reducing Personal Data as Much as Possible

The personal data which are determined not required to be processed by the Company during its activity or not having a reasonable reason for processing is destructed.

Periodic and/or Random Audits

Whether everyone within the company fulfills their obligations regarding data protection and whether the technical measures taken provide the necessary protection or not are determined through periodic and/or random audits. The data obtained in the audits are reported and sent to the relevant departments to make the necessary improvements. These audits, if deemed necessary, are also carried out at the data processors or third-party data controllers who are involved in processing, depending on the Company. Whether such an audit is necessary or not is evaluated in terms of agreements made with the data subjects and based on the relevant data processing activity.

5.1.2. Minimum Technical Measures

Ensuring Cyber Security

Appropriate technical solutions are identified and taken to ensure the cybersecurity of the environments where data are stored and transferred. In the determination of the technical solutions to be taken, the nature of the media where the data are stored and/or transferred, the quality of the stored and/or transferred personal data, and the current technological risks and developments are evaluated. Pro-active action is taken to ensure security.

Ensuring the Security of Physical Environment

The physical environments where data is stored and/or transferred are examined per the nature of the environments and personal data, and active solutions are produced to ensure physical security.

Supply, Development, and Maintenance of Information Technology Systems

Priority resources are allocated for the supply, development, and maintenance of information technology systems where data is stored and/or transferred. Pro-active

solutions are applied to keep the systems always up-to-date and to be protected against existing risks.

Backup

The environments where personal data are stored are backed up securely and regularly.

Authorization and Log Records

The people who can access personal data are determined in advance and unauthorized people other than these people are prevented from accessing personal data. The determination is made according to the nature of the relevant personal data and the legal basis for the processing purpose individually for each relevant category of personal data. The reliable and non-changeable log records showing accesses and amendments for data kept on information systems are kept.

5.2. Ensuring Security of the Special Categories of Personal Data

In the processing of special categories of personal data, it is also necessary to take adequate measures determined by the Board. The company must keep up to date with the adequate measures determined by the Board and promptly implement the determined measures in addition to those already implemented.

Regarding ensuring the security of special categories of the personal data, the provisions of the Security of Special categories of the Personal Data Policy are applied in addition to this policy.

5.3. Disclosure of the Personal Data Illegally

If unauthorized access is detected to personal data kept by the Company or for which the Company is responsible, the person detecting this unauthorized access is obliged to immediately notify the relevant situation to the manager and the department authorized for this purpose within the Company. All necessary measures are taken promptly to stop the disclosure and prevent the damage that has occurred. In case of disclosure, the law department is immediately informed about the relevant situation or, if there is no law department within the Company, the law counseling office is informed, and thereby, the action to be taken is determined.

The breach should be reported to the persons affected by the breach and the Board as soon as possible. Concerning when and how this notice will be given, the action is taken according to the instructions of the law department or, if there is no law department within the Company, the office from which legal advice is received.

SIXTH PART

§ 6. RIGHTS OF THE PERSONAL DATA SUBJECT, EXERCISING THE RIGHTS AND EVALUATION

6.1. Informing the Personal Data Subject

The Company shall inform the natural persons whose personal data are processed, concerning every processing activity individually before starting the processing activity with respect to:

- Identity of the data controller,
- For what purpose personal data will be processed,
- To whom and for what purpose the processed personal data can be transferred,
- The method of and legal reason for collecting personal data,
- Rights laid down in Article 11 of the Law.

The disclosure can be made by the Company or its authorized person by using physical or electronic media such as verbal, written, sound recording, call center, etc. The method of disclosure is determined by considering the nature of the processing activity, the mode of data collection, and the status of the data subjects.

The disclosure to be made to the data subject within the scope of the obligation to inform is made using an understandable, clear, and simple language.

Even if the processing activity is not made with consent, the obligation to inform shall be fulfilled. If the processing activity is made with explicit consent, the obligation to inform and obtaining explicit consent must be fulfilled separately.

If personal data are not obtained from the data subject, the obligation to inform the data subject shall be fulfilled;

a) Within reasonable time from the acquisition of personal data,

b) During the first communication of personal data will be used for communication with the data subject,

c) If personal data are to be transferred, the obligation to inform the data subject must be fulfilled at the latest when the personal data are transferred for the first time.

6.2. Rights of the Personal Data Subject Under the Law

Everyone can exercise the following rights by applying to the data controller:

a) to learn whether personal data relating to them are processed,
b) to request information if personal data relating to them are processed,
c) to learn for what purposes personal data relating to them are processed and whether these data are used in line with these purposes,,

d) to have knowledge of the third persons to whom personal data relating to them are transferred in the country and overseas,,
e) to request rectification of personal data relating to them in cases where they are processed incompletely or inaccurately,
f) To request the deletion or destruction if the reasons for processing the personal data are no longer available,
g) to request notification of the third persons to whom personal data relating to them are transferred, with respect to the operations conducted in accordance with the subparagraphs (e) and (f),
h) to object to any result ensuing to their detriment through analysis of personal data processed especially by means of automatic systems,
i) to request compensation for damages caused by unlawful processing of personal data.

6.3. Exercising the Rights of Personal Data Subject

The data subjects may submit their requests within the scope of their rights to the Company in writing or by using the registered electronic mail (KEP) address, secure electronic signature, mobile signature, or the electronic mail address that has been already notified to the Company by the data subject and registered in the Company's system or through software or application developed for purpose of application. The Company provides suitable environments data subjects to exercise their rights and publishes the information on how to make the application in appropriate environments.

The Company takes all necessary administrative and technical measures to conclude the applications made by the data subject effectively and under the law and in good faith.

The Company accepts the application made to it or rejects it by explaining its reason and then, notifies the response of the acceptance or rejection in writing or electronically in the shortest time and within thirty days at the latest time depending on the nature of the request.

The response letter shall contain the following information at least:

a) Information on the data controller or its representative,

b) Name and surname of the applicant, T.R. identification number for the citizens of the Republic of Turkey and nationality, passport number or identification number, if any, for foreign citizens and place of residence or workplace, e-mail address, telephone, and fax number, if any, for notification,

c) The subject of the request,

d) Statements of the data controller regarding the application

In case the request of the data subject is accepted, the Company meets the request as soon as possible and informs the data subject.

In the requests made, the Company is obliged to identify the person making the request.

SEVENTH PART

§ 7. MANAGEMENT STRUCTURE UNDER COMPANY'S PERSONAL DATA PROCESSING AND PROTECTION POLICY

The Personal Data Committee (hereinafter the "Committee") is formed by the decision of the Company's senior management to manage this Policy and other policies related to and relevant to this Policy within the Company. The Committee is authorized to and in charge of taking necessary measures for the processing of personal data by the law and fulfilling the responsibilities determined by the Law, miscellaneous legislation, and the Company's internal regulations.

The Company stipulates data subjects appointed in the Committee and their duties in the Personal Data Storage and Disposal Policy that it prepares.

EIGHTH PART

§ 8. UPDATE, COMPLIANCE, AND AMENDMENTS

8.1. Update and Compliance

This Policy is updated due to amendments made in the Law or miscellaneous legislations, by the decisions of the Board or in line with the developments in the sector or informatics. The amendments made in this Policy are immediately entered into the text and explanations regarding amendments are announced at the end of the Policy.

8.2. Amendments

31/12/2019: The Personal Data Processing and Protection Policy came into force.

No an older-dated amendment.