

**POLIN GROUP COMPANIES
POLICY FOR SECURITY OF SPECIAL
CATEGORIES OF THE PERSONAL DATA**

1. Introduction

The Personal Data Protection Law No. 6698 defines some data as special categories of personal data and subjected their processing to special conditions. This policy determines the conditions to be followed when processing the special categories of the personal data in addition to the Personal Data Processing and Protection Policy and the Personal Data Storage and Destruction Policy for all group companies within the Polin Group.

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.S. 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.

2. Special Categories of Personal Data

Data revealing racial, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance or dress, membership of an association, foundation or trade union, health, sex life, conviction and security measures and the biometrics and genetics of persons shall constitute special categories of personal data.

3. Additional Measures to be Taken in Processing of Special Categories of the Personal Data

The following additional measures are taken regarding special categories of personal data:

- 3.1 If it is determined that special categories of personal data will be processed in the data processing activity to be started for the first time, the legal advice is got for the relevant processing activity.
- 3.2 The following measures are taken for employees involved in the processing of special categories of personal data:
 - a) Regular training concerning the Law and miscellaneous legislations and special categories of personal data security is given to employees who process special categories of personal data.
 - b) Non-disclosure agreements are made with third parties who take part in the processing of special categories of personal data or to whom such data is transferred.

- c) Users who are authorized to access special personal data are especially determined and their authorization scopes and durations are identified.
 - d) Periodic authorization controls are conducted.
 - e) The authority of the employees whose job position has changed or who have left their jobs is canceled immediately. If there is a data set allocated to them, this data set is taken back.
- 3.3 If the environment where special categories of personal data are processed, stored, and/or accessed is electronic, the following measures are taken in addition to the general measures.
- a) Data are stored using cryptographic methods.
 - b) Cryptographic keys are kept in secure and different environments.
 - c) Transaction records of all transactions performed on the data are logged securely.
 - d) Security updates of the environments where the data are kept, are consistently monitored, necessary security tests are regularly done, or have done, and the test results are recorded and thereby, an action is taken according to the result.
 - e) If the data is accessed through software, user authorization of this software is made, special security tests are made regularly for this software, the test results are recorded and thereby, an action is taken according to the result.
 - f) If remote access to data is required, at least a two-stage authentication system is provided.
- 3.4 If environments where special categories of personal data are processed, stored, and/or accessed are physical environments, the following measures are taken:
- a) Sufficient security measures are taken according to the nature of the environment where special categories of personal data are kept,
 - b) By ensuring the physical security of these environments, unauthorized entries and exits are prevented.
- 3.5 If special categories of personal data are to be transferred,
- a) If the data is to be transferred via e-mail, it is transferred in encrypted form using a corporate e-mail address or a registered e-mail (KEP) account.
 - b) If it needs to be transferred via removable memory, CD, and DVD, it is encrypted with cryptographic methods and the cryptographic key is kept in different environments.
 - c) If a transfer is made between servers in different physical environments, the transfer is made by installing a VPN between servers or using the sFTP method.

- d) If the data is to be transferred in printed matter, necessary precautions should be taken against risks such as theft, loss, or being disclosed to unauthorized persons and the document should be sent in the "highly confidential documents" format.

3.6 The guidelines of the Personal Data Protection Board are followed and these guidelines are taken into account in determining effective security measures.

4. Relationship with Other Policies and Procedures

This policy is applied in addition to other procedures regarding the processing and protection of personal data. If other policies and procedures contain measures that provide more effective protection than those specified here or are not specified here, measures providing more effective protection are also taken.

5. Update and Compliance

The company follows the legislative changes, Board decisions, European Union regulations and relevant board decisions, developments in the field of informatics and the sector, and thereby, it updates this policy and related policies and procedures related to this policy, when necessary.

The amendments made in this Policy are immediately entered into the text and explanations regarding amendments are announced at the end of the Policy.

6. Amendments

31/12/2019: The Policy on Security of Special Categories of the Personal Data came into force.

No an older-dated amendment.