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**Balıkesir Elektromekanik Sanayi Tesisleri A.Ş.  
Personal Data Protection and Processing Policy  
("Policy")**


<b>Document Details</b>	
<b>Document Name:</b>	Balıkesir Elektromekanik Sanayi Tesisleri A.Ş. Personal Data Protection and Processing Policy
<b>Target Group</b>	All natural persons whose personal data are processed by Balıkesir Elektromekanik Sanayi Tesisleri A.Ş.
<b>Reference / Rationale</b>	Personal Data Protection Law no. 6698 and other relevant secondary regulations
<b>Approved by:</b>	Balıkesir Elektromekanik Sanayi Tesisleri A.Ş.

In case of any discrepancy between the Turkish version of this Policy and any translated version of it, the Turkish text should be taken into consideration.

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## BALIKESİR ELEKTROMEKANİK SANAYİ TESİSLERİ A.Ş. PERSONAL DATA PROTECTION AND PROCESSING POLICY

### 1. PURPOSE OF THE POLICY AND CONFIDENTIALITY COMMITMENT

- 1.1. Protecting your fundamental rights and freedoms and your privacy in the processing of your personal data, including, particularly, the right to privacy, and ensuring the security of your personal data in this context are among the top -priority values and objectives of Balıkesir Elektromekanik Sanayi Tesisleri A.Ş. (“**Company**”). In this context, this Balıkesir Elektromekanik Sanayi Tesisleri A.Ş. Personal Data Protection and Processing Policy (“**Policy**”) explains the principles adopted in the execution of personal data processing activities conducted by our Company and the basic principles adopted in terms of ensuring compliance of our Company's data processing activities especially with the Personal Data Protection Law no. 6698 (“**KVKK**”) and the relevant secondary regulations and practices; and thus, our Company provides the necessary transparency by informing you as data subjects.
- 1.2. In this context, our Company warrants to process and protect your personal data with full awareness of responsibility in accordance with the relevant legislation, this Policy and the procedures to be implemented in connection with this Policy.


### 2. SCOPE OF THE POLICY

- 2.1. This Policy relates to all personal data of all natural persons whose personal data are processed whether by automated means or non-automated means that are a part of any data recording system.
- 2.2. This Policy covers and applies to all data processing activities related with personal data processed by the Company.
- 2.3. This Policy does not apply to any data not characterized as personal data.
- 2.4. This Policy may, from time to time, be amended if required by the relevant legislation or deemed necessary by the Company.
- 2.5. In case of any conflict between the relevant statutory regulations and this Policy, the relevant statutory regulations shall prevail.


### 3. DEFINITIONS

The terms and definitions used in this Policy shall have the following meanings:

“**Explicit Consent**” means the freely given, specific and informed consent related to a specific matter;

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<b>“Obligation to Inform”</b>	means the obligation of the Data Controller or the persons authorized by them to provide information to Data Subjects at the time of collection of Personal Data under article 10 of the KVKK and the Communiqué on Procedures and Principles to be followed in the Fulfilment of the Obligation to Inform;
<b>“Data Subject”</b>	means the natural persons whose Personal Data are processed by the Company or the persons/institutions authorized by or on behalf of the Company;
<b>“Destruction”</b>	means deletion, destruction or anonymization of Personal Data;
<b>“Personal Data”</b>	means any information relating to an identified or identifiable natural person (in this Policy, the term “Personal Data” also covers “Special Categories of Personal Data” defined below to the extent applicable);
<b>“Processing of Personal Data”</b>	means any operation or set of operations performed upon Personal Data, whether by automated means, in part or in whole, or non-automated means that are a part of any data recording system, such as collection, recording, storage, preservation, alteration, revision, disclosure, transmission, acquisition, retrieval, categorization, or blocking the use of such data;
<b>“Committee”</b>	means the Company’s Personal Data Protection Committee;
<b>“Board”</b>	means the Personal Data Protection Board;
<b>“Authority”</b>	means the Personal Data Protection Authority;
<b>“KVKK”</b>	means the Personal Data Protection Law no. 6698;
<b>“KVK Regulations”</b>	means the KVKK and any applicable international conventions, relevant laws and regulations, Board decisions, Authority guidelines, and any other regulatory or supervisory authority, court and other governmental authority decisions/instructions regarding the protection of Personal Data as well as all regulations regarding the protection of Personal Data that may be enforced in future and the amendments or changes made thereto;
<b>“KVK Policies”</b>	means the policies issued by the Company on the protection of Personal Data;
<b>“KVK Procedures”</b>	means the procedures setting forth the obligations to be complied with by the Company, Company employees and the Committee within the scope of KVK Policies;
<b>“Special Categories of Personal Data”</b>	means the data relating to individuals’ race, ethnic origin, political opinion, philosophical beliefs, religion, sect or other beliefs, dressing, association, foundation or trade-union membership, health, sexual life, criminal convictions and offences and related security measures as well as biometric and genetic data;
<b>“Data Processor”</b>	means the natural or legal person processing Personal Data on behalf of the Data Controller based on the authorized granted by the data controller;

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**“Data Controller”** means the natural or legal person determining the purposes and means of processing of Personal Data and responsible for the establishment and management of the data recording system.

#### 4. BASIC PRINCIPLES OF PROCESSING OF PERSONAL DATA

##### 4.1. Processing of Personal Data Lawfully and Fairly

The Company processes Personal Data lawfully, fairly and based on the principle of proportionality. In this context, the Company processes Personal Data to the extent required by the Company’s business activities, providing that it is limited to what is necessary.

##### 4.2. Ensuring that Personal Data is Accurate and, where Necessary, kept up-to-date

The Company takes any and all necessary measures to ensure that Personal Data is complete, accurate and up-to-date during the period of processing of such data. In this context, the Company establishes the necessary mechanisms to ensure the accuracy and currency of Personal Data and updates the relevant Personal Data in accordance with Data Subjects’ requests for changes regarding their Personal Data under the KVKK Regulations.

##### 4.3. Processing of Personal Data for Specified, Explicit and Legitimate Purposes


Before the Processing of Personal Data, the Company determines the purposes for which Personal Data will be processed. In this context, the Company clearly sets forth the purposes of processing of Personal Data and processes Personal Data in line with its business activities within the scope of the purposes related to such activities. Accordingly, Data Subjects are informed pursuant to the KVK Regulations and their Explicit Consents are obtained where necessary.

##### 4.4. Processing of Personal Data as Relevant, Limited and Proportionate to the Purposes for which they are processed

The Company collects Personal Data only to the extent and quality required by its business activities and processes it limited to the specified purposes. Accordingly, the Company refrains from processing any Personal Data that is not needed or not related to the achievement of the specified purposes.

##### 4.5. Storage of Personal Data for the Time Period stipulated in the Relevant Legislation or required by the Purposes for which they are processed

**4.5.1.** The Company stores Personal Data for the minimum period required for their processing purpose and stipulated in the relevant statutory legislation. In this context, the Company first identifies whether there is any period of time stipulated in the relevant legislation for storage of personal data, and if such a period is stipulated, the Company acts in accordance with this period. If there is no statutory period, Personal Data are stored for the period required for the purpose(s) for which they are processed.

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- 4.5.2.** Personal Data are Destroyed at the end of the specified storage periods in accordance with the relevant periodic Destruction periods or Data Subject application and using the specified Destruction methods (deletion and/or destruction and/or anonymization). In such cases, it is also ensured that the third persons to whom the Company transfers Personal Data also delete, destroy or anonymize the relevant Personal Data.
- 4.5.3.** The Committee is responsible for the execution of destruction processes. In this context, the necessary procedure is created and established by the Committee.

## 5. PROCESSING OF PERSONAL DATA

Personal Data may be processed by the Company only within the scope of the principles and procedures specified below.

### 5.1. Explicit Consent


- 5.1.1.** Personal Data shall be processed with the Explicit Consent of the Data Subject only in the absence of any of the other Personal Data processing conditions listed below.
- 5.1.2.** In such cases, Personal Data shall be processed after informing Data Subjects within the framework of the Obligation to Inform and if Data Subjects give Explicit Consents with their free will.
- 5.1.3.** Explicit Consents are obtained from Data Subjects with the methods in accordance with the KVK Regulations. Explicit Consents are stored and retained by the Company in a provable manner and for the period required under KVK Regulations.
- 5.1.4.** The Committee is obliged to ensure that the Obligation to Inform is fulfilled in respect of all Personal Data Processing processes; that Explicit Consents are obtained where necessary; and that Explicit Consents are duly stored and preserved. All department employees processing Personal Data are obliged to comply with the Committee's instructions, this Policy, and the KVK Procedures.

### 5.2. If Explicitly Stipulated in the Laws

In cases where the processing is explicitly stipulated in the law on the Processing of Personal Data, in other words, where there is an explicit provision stipulating the Processing of Personal Data in the relevant law; the Data Subject's Personal Data shall be processed within the scope of this data processing condition.

### 5.3. Failure to obtain the Data Subject's Explicit Consent due to Actual Impossibility

If it is required to process Personal Data in order to protect the life or physical integrity of the data subject or another person who is incapable of giving Explicit Consent due to actual impossibility or whose Explicit Consent will be rendered invalid; the Data Subject's Personal Data shall be processed within the scope of this data processing condition.

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#### 5.4. If Directly Related to the Conclusion or Performance of a Contract

If the Processing of Personal Data is required providing that it is directly related to the conclusion or performance of a contract to which the Data Subject is a party, the Data Subject's Personal Data shall be processed within the scope of this data processing condition.

#### 5.5. If Required for Fulfilment of the Company's Legal Obligation(s)

If the processing of Personal Data is required for fulfilment of the Company's legal obligations, the Data Subject's Personal Data shall be processed within the scope of this data processing condition.

#### 5.6. Personal Data Manifestly Made Public by the Data Subject

If any relevant Personal Data have been manifestly made public by the Data Subject, the relevant Personal Data shall be processed within the scope of this data processing condition, limited to the purpose of such public disclosure.

#### 5.7. If the Processing of Personal Data is Required for the Establishment or Defence of a Right

If Personal Data Processing is required for the establishment, exercise or defence of a right or claim, the Data Subject's Personal Data shall be processed within the scope of this data processing condition.


#### 5.8. If the Processing of Personal Data is Required for the Legitimate Interests of the Company

If data processing is required for the Company's legitimate interests except where such interests are overridden by the fundamental rights and freedoms of the Data Subject, the Data Subject's Personal Data shall be processed within the scope of this data processing condition.


## 6. PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA

6.1. Special Categories of Personal Data shall be processed by the Company in accordance with the principles and procedures specified in this Policy and by taking any and all necessary technical and organizational measures, including the methods to be determined by the Board, in case of existence of the following conditions:


- **Special Categories of Personal Data other than those on health and sexual life** are processed without the Data Subject's Explicit Consent if it is explicitly stipulated in the laws, in other words, if there is an explicit provision regarding the Processing of Personal Data in the relevant law. Otherwise, the Data Subject's Explicit Consent is required for the processing of Special Categories of Personal Data other than those regarding health and sexual life.
- **Special Categories of Personal Data on health and sexual life** are processed by the persons under non-disclosure obligation (e.g. workplace doctor working under the Company's payroll) or authorized agencies and institutions, without the Data Subject's Explicit Consent, only for the purposes of protection of public health, provision of preventive medicine, medical diagnosis, and treatment and nursing services, and planning and management of healthcare services and their financing. Otherwise, Data Subject's Explicit Consent is required for the processing of Special Categories of Personal Data other than those on health and sexual life.

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- 6.2.** The Company takes the following actions for the employees involved in the processing of Special Categories of Personal Data:
- 6.2.1.** provides regular trainings on KVK Regulations and the security of Special Categories of Personal Data.
  - 6.2.2.** signs non-disclosure agreements.
  - 6.2.3.** clearly defines the scope and terms of the authorizations of the users authorized to have access to Special Categories of Personal Data.
  - 6.2.4.** performs authorization checks periodically.
  - 6.2.5.** immediately removes the authorizations of employees whose positions are changed or who leave their jobs and immediately takes back the inventory allocated to such employees.
- 6.3.** In case of transfer of Special Categories of Personal Data to electronic media, the Company takes the following actions for the electronic media in which Special Categories of Personal Data are processed, stored and/or accessed to:
- 6.3.1.** protects Special Categories of Personal Data by using cryptographic methods.
  - 6.3.2.** keeps cryptographic keys in secure and different environments.
  - 6.3.3.** securely logs the transaction records about all actions performed on Special Categories of Personal Data.
  - 6.3.4.** continuously monitors the security updates of the media and environment where Special Categories of Personal Data are stored, regularly performs/procures for performance of necessary security tests, and records the relevant test results.
  - 6.3.5.** If Special Categories of Personal Data are accessed via a software, performs user authorizations for such software; regularly performs/procures for performance of the security tests of such software, and records the relevant test results.
  - 6.3.6.** In case of remote access to Special Categories of Personal Data, provides at least a two-factor authentication system.
- 6.4.** In the event of processing of Special Categories of Personal Data in physical media/environment, the Company takes the following actions for the physical media/environment in which data are processed, stored, and/or accessed:
- 6.4.1.** takes adequate security measures (against any possible cases such as electric leakage, fire, flood, theft, etc.) depending on the nature of the environment where Special Categories of Personal Data are located.
  - 6.4.2.** prevents unauthorized entry and exits by ensuring the physical security of such environments.

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- 6.5.** In case of transfer of Special Categories of Personal Data, the Company shall fulfil the following:
- 6.5.1.** If it is necessary to transfer Special Categories of Personal Data via e-mail, an encrypted corporate e-mail address or Registered Electronic Mail (KEP) is used.
- 6.5.2.** If it is necessary to transfer Special Categories of Personal Data via any media such as portable memory, CD, DVD, etc., encryption is performed with encryption methods and the cryptographic key is stored in a different media/environment.
- 6.5.3.** If it is necessary to transfer Special Categories of Personal Data between servers in different physical environments, a VPN is established between the servers or the transfer is executed using the SFTP method.
- 6.5.4.** If it is necessary to transfer Special Categories of Personal Data on paper, necessary measures are taken against the risks such as theft, loss or unauthorized persons seeing the documents and the documents are sent in “classified documents” format.
- 6.6.** In addition to the aforementioned regulations, the Committee is responsible to take necessary measures and to establish necessary mechanisms in accordance with the KVK Regulations, including, especially, the Personal Data Security Guideline published by the Board for ensuring the security of Special Categories of Personal Data.

## **7. PERSONAL DATA PROCESSED BY THE COMPANY AND PURPOSES OF PROCESSING**


Personal Data are processed by the Company by informing Data Subjects pursuant to the KVK Regulations, in line with the Company’s Personal Data processing purposes, based on and limited to at least one of the Personal Data processing conditions specified in articles 5 and 6 of the KVKK, and in accordance with the general principles specified in the KVKK, including, particularly, those specified in article 4 of the KVKK regarding the Processing of Personal Data. Further information on the categories and processing purposes of Personal Data processed within the framework of the purposes and conditions specified herein is provided in ANNEX 1 to this Policy (*ANNEX 1 – Personal Data Categories and Personal Data Processing Purposes*).

## **8. STORAGE PERIOD AND DESTRUCTION OF PERSONAL DATA**

- 8.1.** The Company stores Personal Data for the period required for their processing purpose(s) and for the minimum period stipulated in the relevant statutory legislation. In this context, the Company first identifies whether there is any period of time stipulated in the relevant legislation for storage of Personal Data, and if such a period is stipulated, the Company acts in accordance with this period. If there is no statutory period, Personal Data are stored for the period required for the purpose(s) for which they are processed. The Company does not store Personal Data considering the possibility of use in future under any circumstances.
- 8.2.** The Company establishes a Personal Data storage and Destruction policy in accordance with its Personal Data processing inventory and conducts all Destruction-related activities (deletion and/or destruction and/or anonymization) in compliance with the KVK Regulations and the relevant Personal Data storage and Destruction policy. Personal Data are Destroyed at the end of the

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storage periods specified within the scope of the Personal Data storage and Destruction policy in accordance

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with the relevant periodic Destruction periods or Data Subject application and using the specified Destruction methods (deletion and/or destruction and/or anonymization). The Committee is responsible for the execution of Destruction processes. In this context, the necessary procedure is created and established by the Committee.

## 9. TRANSFER OF PERSONAL DATA

- 9.1.** The Company may transfer Data Subjects' Personal Data to third persons at home and/or abroad in accordance with the KVK Regulations by taking necessary security measures in line with the lawful Personal Data processing purposes. In such cases, necessary protective clauses are incorporated into the contracts concluded with third parties.
- 9.2.** Even in cases where there is no Explicit Consent of the Data Subject, Personal Data may be transferred by the Company to third parties by taking necessary technical and organizational measures in accordance with the KVK Regulations if one or more of the following conditions exist:
- If the relevant activities regarding transfer of Personal Data are explicitly stipulated in the laws;
  - If the transfer of Personal Data by the Company is directly related to and necessary for conclusion or performance of a contract;
  - If the transfer of Personal Data is required for fulfilment of the Company's legal obligations;
  - If the Personal Data are transferred by the company limited to the purpose of public disclosure, providing that the relevant Personal Data have already been manifestly made public by the Data Subject;
  - If the transfer of Personal Data by the Company is required for establishment, exercise or protection of the rights of the Company or the Data Subject or third parties;
  - If it is required to perform Personal Data transfers for the Company's legitimate interests without prejudice to the fundamental rights and freedoms of the Data Subject;
  - If it is required to protect the life or physical integrity of the Data Subject or another person who is incapable of giving consent due to actual impossibility or whose consent is rendered legally invalid.
- 9.3.** In addition to the conditions listed above, Personal Data may be transferred to foreign countries declared by the Board to have an adequate level of protection ("**Foreign Country with an Adequate Level of Protection**") in case of existence of any of the conditions above. In the absence of adequate protection, Personal Data may be transferred to foreign countries for which Data Controllers in Türkiye and in the relevant foreign country undertake to provide an adequate level of protection in writing and which are permitted by the Board ("**Foreign Country with Data Controller(s) Undertaking an Adequate Level of Protection**") in accordance with the data transfer conditions stipulated in the legislation.

## 10. TRANSFER OF SPECIAL CATEGORIES OF PERSONAL DATA

- 10.1.** Special Categories of Personal Data may be transferred by the Company in accordance with the principles specified herein and by taking any and all necessary technical and organizational measures including the methods to be specified by the Board, in case of existence of the following conditions:

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- **Special Categories of Personal Data other than those on health and sexual life** are processed without the Data Subject's Explicit Consent if it is explicitly stipulated in the laws, in other words, if there is an explicit provision regarding the Processing of Personal Data in the relevant law. Otherwise, the Data Subject's Explicit Consent is required for the processing of Special Categories of Personal Data other than those regarding health and sexual life.
- **Special Categories of Personal Data on health and sexual life** are processed by the persons under non-disclosure obligation (e.g. workplace doctor working under the Company's payroll) or authorized agencies and institutions, without the Data Subject's Explicit Consent, only for the purposes of protection of public health, provision of preventive medicine, medical diagnosis, and treatment and nursing services, and planning and management of healthcare services and their financing. Otherwise, Data Subject's Explicit Consent is required for the processing of Special Categories of Personal Data other than those on health and sexual life.

**10.2.** In addition to the aforementioned conditions, Special Categories of Personal Data may be transferred to Foreign Countries with an Adequate Level of Protection in case of existence of any of the conditions listed above. In the absence of an adequate level of protection, such data may be transferred to Foreign Countries with Data Controller(s) Undertaking an Adequate Level of Protection in accordance with the data transfer conditions stipulated in the legislation.


## 11. THE COMPANY'S OBLIGATION TO INFORM


- 11.1.** The Company informs Data Subjects before the processing of Personal Data in accordance with article 10 of the KVKK and the provisions of the Communiqué on Procedures and Principles to be followed in the Fulfilment of the Obligation to Inform. In this context, the Company informs Data Subjects in accordance with the KVK Regulations about the purposes for which their Personal Data are processed and by whom they are processed as the Data Controller, with whom and for which purposes they are shared, by which methods and for which legal reason(s) they are collected, as well as the rights of Data Subjects within the scope of the processing of their Personal Data.
- 11.2.** Necessary KVK Procedures are established by the Committee to ensure the reporting of all new Personal Data processing purposes to the Committee.
- 11.3.** If the Data Processor is a third party other than the Company, a third party undertakes that the relevant third party will act in accordance with the aforementioned obligations with a written contract before the start of Processing of Personal Data. Each employee is obliged to execute the process specified in this Policy and the KVK Procedures in cases where Personal Data are transferred to the Company by a third party.

## 12. DATA SUBJECTS' RIGHTS

**12.1.** Data Subjects have the following rights:

- To learn whether their Personal Data are processed or not;
- If processed, to request information regarding the processing of their Personal Data;

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- To learn the purpose of processing of and whether their Personal Data are used for intended purposes or not;
- To know the third parties to whom their Personal Data are transferred at home or abroad;
- To request for correction of their Personal Data if they have been processed incompletely or inaccurately, and to request for notification of the action taken accordingly to the third parties to whom their Personal Data have been transferred;
- To request for erasure or destruction of their Personal Data if the reasons requiring their processing cease to exist even though they have been processed in accordance with the Law and the provisions of other relevant laws, and to request for notification of the action taken accordingly to the third parties to whom their Personal Data have been transferred;
- To object to any results that may arise to their detriment through the analysis of their processed data exclusively via automated means;
- To claim for compensation of any loss or damages that they may incur due to unlawful processing of their Personal Data.

**12.2.** Data Subjects may submit to the Company their requests about their rights listed in section 12.1 of this Policy using the methods specified by the Board. To this effect, they can use the Balikesir Elektromekanik Sanayi Tesisleri A.Ş. Data Subject Application Form accessible at <http://www.besttransformer.com/Yeni/KisiselVeriler.aspx>. However, in any event, current application methods and the content of application must be checked from the relevant legislation; and applications must be made in accordance with the said procedures and principles.

**12.3.** If Data Subjects submit their requests about their rights listed above to the Company in writing, the Company shall conclude the request free of charge in accordance with the KVK Regulations within 30 (thirty) days at the latest, depending on the nature of the request. If an additional cost arises from conclusion of the requests by the Data Controller, the fees in the tariff specified by the Board may be charged by the Data Controller.


### **13. PERSONAL DATA MANAGEMENT AND SECURITY**

**13.1.** The Company establishes a Committee to fulfil its obligations under the KVK Regulations, to ensure and oversee the preparation and implementation of the KVK Procedures necessary for implementation of this Policy, and to provide recommendations regarding their functioning.

**13.2.** The Company takes all necessary technical and organizational measures to ensure the security of Personal Data in accordance with the KVK Regulations. In this context, the activities regarding the Processing of Personal Data are supervised by the Company using technical systems to the extent allowed by technological possibilities and application costs.

**13.3.** The Company employs competent personnel knowledgeable in technical issues regarding Personal Data Processing activities.

**13.4.** Company employees are informed and trained for the protection and lawful processing of Personal Data.

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- 13.5.** Necessary KVK Procedures are established to ensure that the employees who need to have access to Personal Data in the Company are entitled with the right of access to Personal Data; and the Committee is responsible for establishment and implementation of such procedures.
- 13.6.** Company employees may access Personal Data only within the limits of their authorizations as granted to them and in accordance with the relevant KVK Procedures.
- 13.7.** Company employees shall immediately notify the Company if they suspect that the security of Personal Data is not ensured at an adequate level or if they identify such a vulnerability.
- 13.8.** Detailed KVK Procedures regarding the security of Personal Data are established by the Committee.
- 13.9.** Each person entrusted with a Company device is responsible for the security of the devices allocated for their use.
- 13.10.** Each Company employee is responsible for the security of physical files located in their areas of responsibility.
- 13.11.** If there are any security measures requested or to be additionally requested for the security of Personal Data under the KVK regulations, all employees are obliged to comply with and ensure the continuity of such additional security measures.
- 13.12.** All Personal Data processed within the Company are considered as “Confidential Information” by the Company.
- 13.13.** Company employees have been informed that their obligations regarding the security and confidentiality of Personal Data shall survive even after termination of their employment relationship and a commitment has been obtained from Company employees undertaking that they will comply with these rules.


#### **14. AUDIT**

The Company has the right to audit, directly and regularly and at any time and without prior notice, that all employees and Data Processors of the Company act in accordance with the KVK Regulations, this Policy, and the KVK Procedures; and conducts necessary routine audits in this context. The Committee establishes the KVK Procedures regarding such audits and ensures the implementation of the said procedures.

#### **15. RESPONSIBILITIES**

The Committee responsible for the preparation, revision and implementation of this Policy is appointed by the decision of department managers and, changes in this context are also made in the same way and manner.



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## 16. AMENDMENTS TO THE POLICY

- 16.1.** This Policy may be amended by the Company from time to time.
- 16.2.** The Company makes the current version of the Policy available to Data Subjects at the following website address.

**Relevant Website Address(es):** <http://www.besttransformer.com/Yeni/KisiselVeriler.aspx>


## 17. EFFECTIVE DATE OF THE POLICY

This version of this Policy has entered into effect upon its approval by the Company on **13/05/2020**.


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## ANNEX 1 – Personal Data Categories and Personal Data Processing Purposes


Personal Data Category	Personal Data Processing Purposes
<b>Identity Data</b>	<ul style="list-style-type: none"> <li>• Conducting Management Activities</li> <li>• Providing After-Sales Support Services for Goods / Services</li> <li>• Organization and Event Management</li> <li>• Creating and Monitoring Visitor Records</li> <li>• Informing Authorized Persons, Agencies and Institutions</li> <li>• Foreign Personnel Work and Residence Permit Procedures</li> <li>• Ensuring the Security of Data Controller Operations</li> <li>• Executing Marketing Processes for Products / Services</li> <li>• Implementing the Remuneration Policy</li> <li>• Executing Supply Chain Management Processes</li> <li>• Follow-up of Requests/Complaints</li> <li>• Executing Contract Processes</li> <li>• Executing Performance Assessment Processes</li> <li>• Conducting Activities for Customer Satisfaction</li> <li>• Executing Goods/Services Production and Operation Processes</li> <li>• Executing Goods/Services Sales Processes</li> <li>• Executing Goods/Services Procurement Processes</li> <li>• Conducting Logistics Activities</li> <li>• Conducting Business Continuity Activities</li> <li>• Conducting Occupational Health / Safety Activities</li> <li>• Conducting / Auditing Business Activities</li> <li>• Planning Human Resources Processes</li> <li>• Conducting Communication Activities</li> <li>• Following up and Conducting Legal Affairs</li> <li>• Executing Assignment Processes</li> <li>• Conducting Financial and Accounting Affairs</li> <li>• Conducting Activities in line with the Legislation</li> <li>• Executing Access Authorizations</li> <li>• Conducting Training Activities</li> <li>• Executing Fringe Benefits Processes for Employees</li> <li>• Fulfilling the Obligations for Employees arising from Employment Contracts and Legislation</li> <li>• Executing Employee Satisfaction and Loyalty Processes</li> <li>• Executing Candidate Employee Application Processes</li> <li>• Executing Candidate Employee/Intern/Student Selection and Placement Processes</li> <li>• Executing Information Security Processes</li> <li>• Executing Emergency Management Processes</li> </ul>


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	<ul style="list-style-type: none"> <li>• Audits conducted by Administrative Authorities</li> <li>• Credibility Check</li> <li>• Executing Customer Relations Management Processes</li> </ul>
<b>Communication Data</b>	<ul style="list-style-type: none"> <li>• Organization and Event Management</li> <li>• Informing Authorized Persons, Agencies and Institutions</li> <li>• Executing Marketing Processes for Products / Services</li> <li>• Executing Supply Chain Management Processes</li> <li>• Ensuring the Security of Movable Properties and Resources</li> <li>• Follow-up of Requests/Complaints</li> <li>• Executing Contract Processes</li> <li>• Executing Customer Relations Management Processes</li> <li>• Executing Goods/Services Production and Operation Processes</li> <li>• Executing Goods/Services Sales Processes</li> <li>• Providing After-Sales Services for Goods/Services</li> <li>• Executing Goods/Services Procurement Processes</li> <li>• Conducting Logistics Activities</li> <li>• Conducting Business Continuity Activities</li> <li>• Conducting Occupational Health/Security Activities</li> <li>• Conducting/Auditing Business Activities</li> <li>• Conducting Communication Activities</li> <li>• Executing Assignment Processes</li> <li>• Conducting Financial and Accounting Affairs</li> <li>• Conducting Activities in line with the Legislation</li> <li>• Conducting Training Activities</li> <li>• Conducting Audits/Ethics-Related Activities</li> <li>• Executing Fringe Benefits Processes for Employees</li> <li>• Fulfilling the Obligations for Employees arising from Employment Contracts and Legislation</li> <li>• Executing Candidate Employee Application Processes</li> <li>• Executing Candidate Employee/Intern/Student Selection and Placement Processes</li> <li>• Executing Information Security Processes</li> <li>• Executing Emergency Management Processes</li> </ul>
<b>Location Data</b>	<ul style="list-style-type: none"> <li>• Ensuring the Security of Movable Properties and Resources</li> <li>• Conducting Management Activities</li> <li>• Conducting Business Continuity Activities</li> <li>• Conducting/Auditing Business Activities</li> </ul>
<b>Personnel Data</b>	<ul style="list-style-type: none"> <li>• Providing After-Sales Services for Goods/Services</li> <li>• Conducting Management Activities</li> <li>• Conducting Occupational Health/Security Activities</li> <li>• Planning Human Resources Processes</li> <li>• Conducting Communication Activities</li> <li>• Following up and Conducting Legal Affairs</li> </ul>

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	<ul style="list-style-type: none"> <li>• Executing Assignment Processes</li> <li>• Conducting Financial and Accounting Affairs</li> <li>• Conducting Activities in line with the Legislation</li> <li>• Executing Fringe Benefits Processes for Employees</li> <li>• Fulfilling the Obligations for Employees arising from Employment Contracts and Legislation</li> <li>• Audits conducted by Administrative Authorities</li> <li>• Executing Candidate Employee/Intern/Student Selection and Placement Processes</li> <li>• Executing Candidate Employee Application Processes</li> <li>• Executing Employee Satisfaction and Loyalty Processes</li> <li>• Conducting Audits/Ethics-Related Activities</li> <li>• Conducting Training Activities</li> <li>• Executing Access Authorizations</li> <li>• Conducting/Auditing Business Activities</li> <li>• Conducting Business Continuity Activities</li> <li>• Executing Performance Assessment Processes</li> <li>• Informing Authorized Persons, Agencies and Institutions</li> </ul>
<b>Legal Action Data</b>	<ul style="list-style-type: none"> <li>• Informing Authorized Persons, Agencies and Institutions</li> <li>• Following up and Conducting Legal Affairs</li> <li>• Conducting Activities in line with the Legislation</li> </ul>
<b>Customer Transaction Data</b>	<ul style="list-style-type: none"> <li>• Follow-up of Requests/Complaints</li> <li>• Providing After-Sales Services for Goods/Services</li> <li>• Executing Customer Relations Management Processes</li> <li>• Conducting Financial and Accounting Affairs</li> <li>• Executing Goods/Services Sales Processes</li> </ul>
<b>Physical Premises Security Data</b>	<ul style="list-style-type: none"> <li>• Ensuring the Security of Data Controller Operations</li> <li>• Conducting Occupational Health/Security Activities</li> <li>• Ensuring Physical Premises Security</li> <li>• Executing Emergency Management Processes</li> <li>• Conducting/Auditing Business Activities</li> <li>• Informing Authorized Persons, Agencies and Institutions</li> <li>• Conducting Management Activities</li> </ul>
<b>Transaction Security Data</b>	<ul style="list-style-type: none"> <li>• Ensuring the Security of Data Controller Operations</li> <li>• Conducting Activities in line with the Legislation</li> <li>• Executing Information Security Processes</li> </ul>
<b>Risk Management Data</b>	<ul style="list-style-type: none"> <li>• Conducting Management Activities</li> <li>• Executing Risk Management Processes</li> <li>• Executing Customer Relations Management Processes</li> <li>• Executing Goods/Services Procurement Processes</li> <li>• Conducting Financial and Accounting Affairs</li> </ul>
<b>Financial Data</b>	<ul style="list-style-type: none"> <li>• Executing Contract Processes</li> <li>• Executing Goods/Services Sales Processes</li> </ul>

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	<ul style="list-style-type: none"> <li>• Executing Goods/Services Procurement Processes</li> <li>• Conducting/Auditing Business Activities</li> <li>• Conducting Financial and Accounting Affairs</li> <li>• Executing Fringe Benefits Processes for Employees</li> <li>• Fulfilling the Obligations for Employees arising from Employment Contracts and Legislation</li> <li>• Conducting Business Continuity Activities</li> </ul>	
<b>Professional Experience Data</b>	<ul style="list-style-type: none"> <li>• Conducting Training Activities</li> <li>• Planning Human Resources Processes</li> <li>• Executing Candidate Employee Application Processes</li> <li>• Executing Candidate Employee/Intern/Student Selection and Placement Processes</li> <li>• Conducting Audits/Ethics-Related Activities</li> <li>• Conducting Activities in line with the Legislation</li> <li>• Executing Assignment Processes</li> <li>• Conducting/Auditing Business Activities</li> <li>• Executing Customer Relations Management Processes</li> <li>• Executing Contract Processes</li> </ul>	
<b>Audio-Visual Records</b>	<ul style="list-style-type: none"> <li>• Organization and Event Management</li> <li>• Conducting Business Continuity Activities</li> <li>• Ensuring Physical Premises Security</li> <li>• Executing Candidate Employee Application Processes</li> <li>• Conducting Communication Activities</li> <li>• Executing Information Security Processes</li> <li>• Planning Human Resources Processes</li> <li>• Conducting/Auditing Business Activities</li> <li>• Conducting Social Responsibility and Civil Society Activities</li> <li>• Informing Authorized Persons, Agencies and Institutions</li> <li>• Conducting Management Activities</li> </ul>	
<b>Trade-Union Membership Data</b>	<ul style="list-style-type: none"> <li>• Informing Authorized Persons, Agencies and Institutions</li> <li>• Executing Contract Processes</li> <li>• Fulfilling the Obligations for Employees arising from Employment Contracts and Legislation</li> <li>• Executing Employee Satisfaction and Loyalty Processes</li> <li>• Conducting Activities in line with the Legislation</li> <li>• Planning Human Resources Processes</li> <li>• Conducting/Auditing Business Activities</li> </ul>	
<b>Health Data</b>	<ul style="list-style-type: none"> <li>• Conducting/Auditing Business Activities</li> <li>• Preventive Medicine</li> <li>• Providing Medical Diagnosis, Treatment and Nursing Services</li> <li>• Conducting Occupational Health/Security Activities</li> <li>• Conducting Activities in line with the Legislation</li> <li>• Executing Fringe Benefits Processes for Employees</li> </ul>	

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	<ul style="list-style-type: none"> <li>• Fulfilling the Obligations for Employees arising from Employment Contracts and Legislation</li> <li>• Conducting Business Continuity Activities</li> <li>• Informing Authorized Persons, Agencies and Institutions</li> </ul>	
<b>Criminal Convictions &amp; Offences and Security Measures Data</b>	<ul style="list-style-type: none"> <li>• Informing Authorized Persons, Agencies and Institutions</li> <li>• Conducting Audits/Ethics-Related Activities</li> <li>• Planning Human Resources Processes</li> <li>• Conducting Activities in line with the Legislation</li> <li>• Conducting/Auditing Business Activities</li> </ul>	
<b>Biometric Data</b>	<ul style="list-style-type: none"> <li>• Ensuring the Security of Data Controller Operations</li> <li>• Ensuring Physical Premises Security</li> <li>• Conducting/Auditing Business Activities</li> </ul>	
<b>Assignment Travel Data</b>	<ul style="list-style-type: none"> <li>• Conducting/Auditing Business Activities</li> <li>• Planning Human Resources Processes</li> <li>• Executing Assignment Processes</li> <li>• Fulfilling the Obligations for Employees arising from Employment Contracts and Legislation</li> <li>• Executing Customer Relations Management Processes</li> </ul>	