

BMA TECHNOLOGY INC. POLICY ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

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1. PURPOSE AND SCOPE

BMA Technology Anonim Şirketi (“BMA Technology” or “Company”), which has adopted the utmost care in compliance with the legal order, establishes systems for the execution of all kinds of activities necessary in terms of compliance with the legislation on the processing and protection of personal data. BMA Technology Inc. The Processing and Protection of Personal Data Policy (“BMA Technology GDPR Policy”) and the principles adopted by BMA Technology in the protection and processing of personal data are regulated. In line with the importance that BMA Technology attaches to the protection of personal data, the basic principles regarding the compliance of the BMA Technology GDPR Policy and the activities carried out by BMA Technology with the regulations in the Personal Data Protection Law No. 6698 (“GDPR Law”) are determined. With the implementation of the BMA Technology GDPR Policy regulations, the data security principles adopted by BMA Technology will be made sustainable. BMA Technology GDPR Policy is for the personal data of natural persons and BMA Technology employees whose personal data is processed by BMA Technology automatically or non-automatically provided that they are part of any data recording system.

2. TARGET

With the BMA Technology GDPR Policy, it is aimed to create the necessary systems and to establish the necessary order to ensure compliance with the legislation in line with the goal of raising awareness about the legal processing and protection of personal data within BMA Technology. In this context, BMA Technology GDPR Policy aims to provide guidance in terms of the implementation of the regulations set forth in the GDPR Law and the relevant legislation and to provide transparency by informing the persons whose personal data are processed by our Company.

3. DEFINITIONS

The definitions used and important in the BMA Technology GDPR Policy are as follows:

Explicit Consent: Consent on a specific subject, based on information and expressed with free will.

Anonymization: Making personal data incapable of being associated with an identified or identifiable natural person in any way, even by matching it with other data.

Communiqué on the Procedures and Principles to be Complied with in Fulfilling the Lighting Obligation: Communiqué on the Procedures and Principles to be Followed in the Fulfillment of the Lighting Obligation, which was published in the Official Gazette dated 10 March 2018 and numbered 30356.

Employee(s): BMA Technology employee(s).

Regulation on the Processing of Personal Health Data: Regulation on the Processing of Personal Health Data and Ensuring Privacy, published in the Official Gazette dated 20 October 2016 and numbered 29863.

Personal Health Data: Physical and mental health of an identified or identifiable natural person.

all kinds of information about the health of the person and the information about the health service offered to the person.

Personal Data: Any information relating to an identified or identifiable natural person.

Personal Data Owner: The natural person whose personal data is processed. For example; customers and employees.

Processing of Personal Data: Obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available personal data by fully or partially automatic or non-automatic means provided that it is a part of any data recording system, All kinds of operations performed on data such as classification or prevention of use.

GDPR Law: The Law on Protection of Personal Data No. 6698, dated March 24, 2016, published in the Official Gazette dated 7 April 2016 and numbered 29677.

GDPR Board: Personal Data Protection Board.

GDPR Authority: Personal Data Protection Authority.

Special Qualified Personal Data: Data related to race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data .

BMA Technology / Company : BMA Technology Anonim Şirketi.

BMA Technology Business Partners: The parties with which BMA Technology has business partnerships for various purposes while carrying out its commercial activities are the main employers.

BMA Technology Personal Data Retention and Destruction Policy: Pursuant to the Regulation on the Deletion, Destruction, Anonymization of Personal Data, the basis for the deletion, destruction and

anonymization of personal data with the process of determining the maximum period required for the purpose for which personal data is processed has been made by BMA Technology. “BMA Technology A.Ş. Personal Data Retention and Destruction Policy”.

BMA Technology GDPR Policy: BMA Technology A.Ş. Personal Data Protection and Processing Policy.

BMA Technology Suppliers: Parties that provide services to BMA Technology on a contractual basis.

BMA Technology Data Owner Application Form: The application form that data owners will use when using their applications regarding their rights in Article 11 of the GDPR Law.

Data Processor: The natural and legal person who processes personal data on behalf of the data controller, based on the authority given by the data controller.

Data Controller: The person who determines the purposes and means of processing personal data and manages the place where the data is kept systematically.

Data Controllers Registry: The Data Controllers Registry, which is open to the public and kept under the supervision of the Personal Data Protection Authority, under the supervision of the GDPR Board.

Communiqué on Application Procedures and Principles to Data Controller: Communiqué on Application Procedures and Principles to Data Controller, which was published in the Official Gazette dated 10 March 2018 and numbered 30356.

4. ROLES AND RESPONSIBILITIES

Although the Finance Director is responsible for the implementation of the BMA Technology GDPR Policy in all BMA Technology operations, activities and processes; The Quality Coordinator will be the source of advice and guidance in the implementation of the regulations, procedures, guide standards and training activities prepared in accordance with the BMA Technology GDPR Policy. All of our employees, business partners, guests, visitors and related third parties across BMA Technology are obliged to cooperate with the Quality Coordinator in preventing legal risks and imminent danger, along with compliance with the BMA Technology GDPR Policy. All organs and departments of BMA Technology are responsible for observing compliance with the BMA Technology GDPR Policy.

5. PRINCIPLES OF BMA TECHNOLOGY GDPR POLICY

5.1. PERSON GROUPS MANAGED BY BMA TECHNOLOGY GDPR POLICY

Data owners whose personal data are processed by BMA Technology within the scope of BMA Technology GDPR Policy are grouped below:

- BMA Technology Employee Candidates

A service contract has not been established with BMA Technology, but BMA Technology is about to be established.

persons included in the assessment.

- BMA Technology Trainee Candidates/Interns

With the people who were taken into the BMA Technology evaluation to do internship at BMA Technology.

trainees.

- BMA Technology Employees

Persons who have or will be established a service contract with BMA Technology and whose BMA Technology evaluation has been made.

- BMA Technology Business Partners Officials, Employees

Natural person officials, shareholders, employees of organizations with which BMA Technology has a commercial relationship.

- BMA Technology Visitors

Natural persons who visit BMA Technology buildings or the website operated by BMA Technology.

- Other Natural Persons

All real people.

5.2. PURPOSE OF PROCESSING PERSONAL DATA WITHIN THE SCOPE OF BUSINESS ACTIVITIES CARRIED OUT BY BMA TECHNOLOGY

1. Determination, planning and implementation of short/medium/long term commercial policies of BMA Technology

- a. Planning and execution of external training activities
- b. Management of relations with business partners and suppliers

2. Designing and Executing Human Resources Activities of BMA Technology

- a. Execution of employee procurement processes
- b. Planning and execution of trainee procurement, placement and operation processes
- c. Planning of human resources processes
- D. Fulfillment of obligations arising from employment contracts and legislation for employees
- to. Monitoring and control of the business activities of the employees
- f. Planning and execution of fringe benefits and benefits for employees
- g. Planning and execution of employee exit procedures
- h. Planning and monitoring of employee performance evaluation processes
- I. Planning and execution of in-company training activities

j. Management of relations with business partners and suppliers

k. Compensation Management

l. Planning and execution of in-house orientation activities

3. Carrying out the Necessary Works by the Business Units of the Company in order to carry out the commercial activities carried out by BMA Technology in accordance with the Legislation and Company Policies and Carrying out the Activities in This Line

a. Follow-up of finance and accounting works

b. Managing investor relations

c. Planning and execution of corporate communication activities

D. Planning and execution of efficiency/efficiency and appropriateness analyzes of business activities

to. event management

f. Creation and management of information technology infrastructure

g. Planning, auditing and execution of information security processes

h. Planning and execution of business continuity activities

l. Planning and execution of information access authorizations of business partners and suppliers

4. Protecting BMA Technology's Commercial Reputation and Trust

a. Request and complaint management

b. Carrying out studies to protect the reputation of the company and company values

6. BMA REGARDING THE PROCESSING AND PROTECTION OF PERSONAL DATA

PRINCIPLES ADOPT BY TECHNOLOGY

6.1. PERFORMING PERSONAL DATA PROCESSING ACTIVITIES IN ACCORDANCE WITH DATA PROCESSING CONDITIONS

BMA Technology acts in accordance with (i) basic principles, (ii) personal data processing conditions, and (iii) special categories of personal data processing while carrying out personal data processing activities.

6.1.1. Compliance with Core Principles

BMA Technology adopts the following basic principles within the scope of complying with the personal data protection legislation and maintaining compliance:

a. Processing personal data in accordance with the law and honesty rules

BMA Technology carries out its personal data processing activities in accordance with the law and the rule of honesty, in accordance with the legislation on the protection of personal data, especially the Constitution of the Republic of Turkey.

b. Ensuring the accuracy and up-to-dateness of the personal data processed

While processing personal data by BMA Technology, all necessary administrative and technical measures are taken to ensure the accuracy and up-to-dateness of personal data within technical possibilities. In this context, our company has established mechanisms to correct and confirm the accuracy of personal data of personal data owners in case of inaccuracy.

c. Processing of personal data for specific, explicit and legitimate purposes

Personal data processing activities by BMA Technology are carried out within the scope of clear and lawful purposes that were determined before the personal data processing activity started.

D. Processing personal data in a limited and measured way in connection with the purpose

Personal data is processed by BMA Technology in connection with data processing conditions and as necessary for the realization of these services. In this context, the purpose of personal data processing is determined before the personal data processing activity is started, and data processing is not carried out on the assumption that it can be used in the future.

to. Keeping personal data for as long as required by the relevant legislation or for the purpose for which they are processed.

BMA Technology retains personal data limited to the period stipulated in the relevant legislation or required by the data processing purpose. In this respect, personal data is deleted, destroyed or anonymized by BMA Technology in the event that the period stipulated in the legislation expires or the reasons requiring the processing of personal data disappear.

6.1.2. Compliance with Personal Data Processing Terms

BMA Technology carries out its personal data processing activities in accordance with the data processing conditions set forth in Article 5 of the GDPR Law. In this context, the personal data processing activities carried out are carried out in the presence of the personal data processing conditions listed below:

- a. Existence of Explicit Consent of the Personal Data Owner Data
- b. c. Failure to Obtain the Explicit Consent of the Data Owner due to Actual Impossibility and Obligatory Personal Data Processing
- c. In cases where the personal data owner cannot explain his/her consent or his/her consent is not valid, in order to protect the life or physical integrity of individuals, personal data
- d.
- e. If processing is mandatory, data processing activity is carried out by BMA Technology within this scope.
- f. D. The Personal Data Processing Activity is Directly Related to the Establishment or Performance of a Contract
- g. In cases that are directly related to the establishment or performance of a contract, data processing activities are carried out by BMA Technology if it is necessary to process the personal data of the parties to the contract.
- h. to. Obligation to Conduct Personal Data Processing for BMA Technology to Fulfill its Legal Obligation
- i. In case of a legal obligation of BMA Technology, which has adopted the Company policy to show the necessary sensitivity in terms of compliance with the law, personal data processing is carried out in order to fulfill the legal obligation.
- j. f. Publicizing Personal Data of the Data Owner

- k. Personal data made public (in any way publicly disclosed) by the data subject is processed by BMA Technology in accordance with the purpose of making it public.
- l. g. Requirement of Data Processing for the Establishment, Use or Protection of a Right
- m. In case the processing of personal data is necessary for the establishment, exercise or protection of a right, personal data processing activities are carried out by BMA Technology in parallel with this obligation.
- n. h. Carrying out Personal Data Processing Activity is Obligatory for BMA Technology's Legitimate Interests, Provided that it does not harm the Fundamental Rights and Freedoms of the Data Owner
- o. If personal data processing is necessary for the legitimate interests of BMA Technology, data processing can be carried out if the fundamental rights and freedoms of the data owner are not harmed.
- p. 6.1.3. Compliance with Special Categories of Personal Data Processing Conditions
- q. Special attention is paid by BMA Technology to the processing of personal data of special nature, which carries the risk of discrimination when processed unlawfully. In this context, BMA Technology firstly determines whether there are data processing conditions in sensitive personal data processing, and after making sure that the condition of compliance with the law exists, data processing activities are carried out.
- r. Special categories of personal data can be processed by BMA Technology in the following cases, provided that adequate measures determined by the GDPR Board are taken:
 - s. a. Processing of Personal Health Data
 - t. Personal health data can be processed by BMA Technology in the presence of one of the conditions listed below:
 - u. – Protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and financing of health services.
 - v.
 - w. for the purpose of management, by persons or authorized institutions and organizations under the obligation to keep secrets; or
 - x. – Existence of the explicit consent of the personal data owner,
 - y. b. Processing of Private Personal Data Other than Health and Sexual Life
 - z. Special categories of personal data other than health and sexual life (race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, clothing, association, foundation or union membership, criminal convictions and security measures) by BMA Technology data and biometric and genetic data); It can be processed if the data owner gives explicit consent or in cases stipulated by the laws.
- aa. 6.1.4. Compliance with Personal Data Transfer Terms
- bb. Personal data transfers to be made by BMA Technology are in accordance with the personal data transfer conditions regulated in Articles 8 and 9 of the GDPR Law.
- cc. a. Domestic Transfer of Personal Data
- dd. BMA Technology acts in accordance with the data processing conditions (See BMA Technology GDPR Policy Section 6.1.) in data transfer activities to be carried out in the country pursuant to Article 8 of the GDPR Law.
- ee. b. Transfer of Personal Data Abroad
- ff. Personal data by BMA Technology in accordance with Article 9 of the GDPR Law;
- gg. (i) in accordance with the personal data processing conditions (See BMA Technology GDPR Policy Section 6.1.)
- hh. as and

- ii. (ii) If the country to be transferred is one of the countries with sufficient protection declared by the GDPR Board, or if there is no adequate protection in the relevant foreign country, the data controllers in Turkey and the relevant foreign country undertake in writing to provide adequate protection and can be transferred abroad with the permission of the GDPR Board.
- jj. (iii) To authorized public institutions and organizations and authorized private legal persons, limited to the purpose requested by the relevant persons within their legal authority,
- kk. (iv) In accordance with the terms of personal data transfer to third parties.

ll. 6.2. DISCLOSURE OF PERSONAL DATA OWNERS BY BMA TECHNOLOGY

mm. BMA Technology, in accordance with Article 10 of the GDPR Law and the Communiqué on the Procedures and Principles to be Complied with in Fulfilling the Obligation of Disclosure,

nn.

oo. carries out the necessary processes to ensure that the data owners are informed during the acquisition. In this context, there is the information listed below in the information texts submitted by BMA Technology to the data owners:

pp. (1) The title of our company,

qq. (2) For what purpose the personal data of data subjects will be processed by BMA Technology,

rr. (3) To whom and for what purpose the processed personal data can be transferred,

ss. (4) Method and legal reason for collecting personal data,

tt. (5) Rights of the data subject.

uu. 6.3. WEBSITE VISITORS BY BUILDING, FACILITY ENTRANCES AND PERSONAL DATA PROCESSING ACTIVITIES IN THE BUILDING FACILITY

vv. In order to ensure security by BMA Technology, personal data processing activities are carried out in order to monitor the entrance and exit of the guests with security cameras in the company buildings and facilities. BMA Technology carries out personal data processing by using security cameras and recording guest entries and exits.

ww. 6.3.1. BMA Technology Building Facility Entrances and With Camera Driven Inside

xx. Monitoring Activity

yy. BMA Technology, within the scope of surveillance with security cameras; It aims to protect the interests of the company and other persons in order to ensure their safety.

zz. Personal data processing activities carried out by BMA Technology at the entrance of the building and within the facility are carried out in accordance with the Constitution, the GDPR Law and other relevant legislation.

aaa. a. Legal Basis for Surveillance Activity

bbb. The camera monitoring activity carried out by BMA Technology is carried out in accordance with the Law on Private Security Services and the relevant legislation.

ccc. b. Carrying out Surveillance Activities with Security Cameras According to GDPR Law

ddd. BMA Technology acts in accordance with the regulations in the GDPR Law in the execution of camera surveillance for security purposes. In order to ensure security in its buildings and facilities, BMA Technology carries out security camera monitoring activities in accordance with the purposes stipulated in the relevant legislation in force and in accordance with the personal data processing conditions listed in the GDPR Law.

eee. c. Announcement of Monitoring Activity with Camera

fff. BMA Technology informs the personal data owner in accordance with Article 10 of the GDPR Law. BMA Technology notifies with more than one method regarding the camera monitoring activities of the lighting it performs regarding general issues. Thus, it is aimed to prevent

harming the fundamental rights and freedoms of the personal data owner, and to ensure transparency and enlightenment of the personal data owner.

ggg. For the camera monitoring activity by BMA Technology; This Policy is published on the BMA Technology website (online policy regulation) and

hhh.

iii. A notification letter stating that monitoring will be carried out is posted at the entrances of the monitoring areas (on-site lighting).

6.3.4. Website Visitors

BMA Technology on the websites it owns; to ensure that the visitors of these sites perform their visits on the sites in accordance with the purposes of their visit; Internet movements within the site are recorded by technical means (eg Cookies - cookies) in order to show them customized content and to engage in online advertising activities.

Detailed explanations regarding the protection and processing of personal data regarding these activities carried out by BMA Technology are included in the texts of the "BMA Technology Website Privacy Policy" of the relevant websites.

6.4. CONCLUSION OF REQUESTS OF PERSONAL DATA OWNERS BY BMA TECHNOLOGY

In case the data owners submit their requests regarding their personal data to our Company in writing or by other methods determined by the GDPR Board, BMA Technology as the data controller, in accordance with Article 13 of the GDPR Law, as soon as possible and within thirty (30) days at the latest, depending on the nature of the request. carries out the necessary processes to ensure its conclusion. Data owners should make their requests regarding their personal data in line with the Communiqué on Application Procedures and Principles to the Data Controller. Within the scope of ensuring data security, BMA Technology may request information in order to determine whether the applicant is the owner of the personal data subject to the application. Our company may also ask questions about the personal data owner's application in order to ensure that the application of the personal data owner is concluded in accordance with the request.

The application of the data owner; In cases where there is a possibility of impeding the rights and freedoms of other persons, requiring disproportionate effort, and the information is publicly available, the request may be rejected by BMA Technology by explaining the reason.

6.4.1. Rights of Personal Data Owners

Pursuant to Article 11 of the GDPR Law, by applying to our Company,

You can request for:

- To learn whether your personal data is processed,
- If your personal data has been processed, to request information about it,
- To learn the purpose of processing your personal data and whether they are used in accordance with the purpose,
- To learn the third parties to whom your personal data is transferred in the country or abroad,
- Requesting correction of your personal data if it is incomplete or incorrectly processed and requesting the notification of the transaction made within this scope to the third parties to whom your personal data has been transferred,
- Although it has been processed in accordance with the provisions of the GDPR Law and other relevant laws, in the event that the reasons requiring processing are eliminated, the personal

to request the deletion, destruction or anonymization of your data and to notify the third parties to whom your personal data has been transferred,

☒ Objecting to the emergence of a result against you by analyzing your processed data exclusively through automated systems,

☒ To request the removal of the damage in case you suffer damage due to unlawful processing of your personal data.

6.4.2. Circumstances Excluded from the Rights of Personal Data Owners as per the Legislation Pursuant to Article 28 of the GDPR Law, personal data owners will not be able to assert their rights in the following matters, since the following situations are not within the scope of the GDPR Law:

☒ Processing of personal data for art, history, literature or scientific purposes or within the scope of freedom of expression, provided that it does not violate national defense, national security, public security, public order, economic security, privacy of private life or personal rights or constitute a crime.

☒ Processing of personal data for purposes such as research, planning and statistics by anonymizing them with official statistics.

☒ Processing of personal data within the scope of preventive, protective and intelligence activities carried out by public institutions and organizations authorized by law to ensure national defense, national security, public safety, public order or economic security.

☒ Processing of personal data by judicial authorities or execution authorities in relation to investigation, prosecution, trial or execution proceedings.

Pursuant to article 28/2 of the GDPR Law; Personal data owners will not be able to assert their rights, with the exception of demanding compensation in the following cases:

☒ The processing of personal data is necessary for the prevention of crime or for criminal investigation.

☒ Processing of personal data made public by the personal data owner (himself).

☒ The processing of personal data is necessary for the execution of supervisory or regulatory duties and for disciplinary investigation or prosecution by authorized and authorized public institutions and organizations and professional organizations in the nature of public institution, based on the authority given by the law.

☒ The processing of personal data is necessary for the protection of the economic and financial interests of the state with regard to budgetary, tax and financial matters.

6.4.3. Right of Personal Data Owner to Complain to the GDPR Board

In cases where the application is rejected, the response given is insufficient, or the application is not answered in due time, in accordance with Article 14 of the Personal Data Owner GDPR Law; He/she may file a complaint to the GDPR Board within thirty days from the date BMA Technology learned of the answer, and in any case within sixty days from the date of application.

6.5. CATEGORIES OF PERSONAL DATA PROCESSED WITHIN THE SCOPE OF PERSONAL DATA PROCESSING ACTIVITIES CONDUCTED BY BMA TECHNOLOGY AND CATEGORIES OF SHARED PARTIES

6.5.1. Personal Data Categories

The categories and explanations of personal data processed within the scope of personal data processing activities carried out by BMA Technology are listed below:

Identity Information: Personal data containing information about the identity of the person; name surname,

T.R. Documents such as driver's license, identity card and passport containing information such as identity number, nationality information, mother's name and father's name, place of birth, date of birth, gender, tax number, SGK number, signature information, vehicle license plate, etc. informations.

Contact Information: Contact information; personal data such as phone number, address, e-mail address, fax number.

Location Data: Personal data that determines the location of the location when using BMA Technology tools and devices; GPS location, travel data etc.

Family Members and Close Information: Personal data about family members (for example, spouse, mother, father, child) and relatives of the personal data owner in order to protect the legal interests of BMA Technology and the data owner, within the framework of the operations carried out by BMA Technology business units.

Physical Space Security Information: Personal data regarding the records and documents taken at the entrance to the physical space, during the stay in the physical space; camera records, fingerprint records and records taken at the security point, etc.

Transaction Security Information: Personal data processed to ensure the technical, administrative, legal and commercial security of both the data owner and the Company while carrying out the commercial activities of BMA Technology.

Risk Management Information: Personal data processed through the methods used in accordance with the generally accepted legal, commercial practices and honesty rules in these areas in order to manage commercial, technical and administrative risks.

Financial Information: Personal data processed regarding information, documents and records showing all kinds of financial results created within the scope of the legal relationship between BMA Technology and the data owner, and personal data such as bank account number, IBAN number, credit card information, financial profile, asset data, income information .

Employee/Trainee Candidate Information: Processed personal data of individuals who have applied to become a BMA Technology employee/intern or who have been evaluated as an Employee/Trainee Candidate in line with the human resources needs of our Company in accordance with the rules of commercial practice and honesty, or who are in a working/internship relationship with our Company.

Legal Action and Compliance Information: Personal data processed within the scope of determination of legal receivables and rights of BMA Technology, follow-up and performance of debts, legal obligations and compliance with BMA Technology policies.

Audit and Inspection Information: Personal data processed within the scope of BMA Technology's legal obligations and compliance with Company policies.

Special Quality Personal Data: Data specified in Article 6 of the GDPR Law (for example, health data including blood group, biometric data, religion and membership association information).

Request/Complaint Management Information: Personal data regarding the receipt and evaluation of any request or complaint directed to BMA Technology.

Reputation Management Information: Personal data associated with the person and collected for the purpose of protecting the commercial reputation of BMA Technology (for example, sharing about BMA Technology).

Incident Management Information: Information and evaluations collected about events that are associated with the personal data owner and that have the potential to affect BMA

Technology employees and business partners (for example, information collected regarding the correct management of the public, evaluations, etc.)

6.5.2. Shared Party Categories

BMA Technology adheres to the principles set forth in the GDPR Law and in particular, the 8th and

In accordance with Article 9, the personal data of data owners (See Section 5.1.) within the scope of BMA Technology GDPR Policy may be transferred to the following groups of persons for the purposes stated:

- (i) BMA Technology Suppliers,
- (ii) BMA Technology Business Partners/Main Employers,
- (iii) Authorized public institutions and organizations and authorized private legal persons,
- (iv) To other third parties in accordance with the data transfer terms.

The scope of the above-mentioned persons to whom the transfer is made and the possible data transfer purposes are stated below.

PERSONS WHO MAY BE TRANSFERRED TO DATA	DEFINITION	PURPOSE OF DATA TRANSFER
Business Partner/Primary Employer	Parties with whom BMA Technology has business partnerships for purposes such as conducting commercial activities	Limited to ensure the fulfillment of the purposes for which the business partnership was established.
Supplier	Parties that provide services to BMA Technology on a contractual basis, in accordance with BMA Technology's orders and instructions, within the scope of carrying out the commercial activities of BMA Technology	The services that the Company outsources from the supplier and that are necessary to carry out the Company's commercial activities are provided to the Company. limited to provide
Legally Authorized Public Institutions and Organizations	According to the provisions of the relevant legislation, public institutions and organizations authorized to receive information and documents from the Company	Limited to the purpose requested by the relevant public institutions and organizations within the legal authority
Legally Authorized Private Law Persons	Private law persons authorized to receive information and documents from the Company in accordance with the provisions of the relevant legislation	Limited to the purpose requested by the relevant private legal persons within the scope of their legal authority.

6.6. ENSURING THE SECURITY AND CONFIDENTIALITY OF PERSONAL DATA BY BMA TECHNOLOGY

BMA Technology takes all necessary measures, within the possibilities, according to the nature of the data to be protected, in order to prevent the unlawful disclosure, access, transfer or security deficiencies that may occur in other ways.

In this context, all necessary (i) administrative and (ii) technical measures are taken by BMA Technology, (iii) an audit system is established within the company, and (iv) in case of unlawful disclosure of personal data, it acts in accordance with the measures stipulated in the GDPR Law.

a. Administrative Measures Taken by BMA Technology to Ensure Legal Processing of Personal Data and to Prevent Unlawful Access to Personal Data

☑ BMA Technology trains and raises awareness of its employees regarding the legislation on the protection of personal data.

☑ Personal data processing activities carried out by BMA Technology are analyzed in detail for all business units, and as a result of this analysis, personal data processing activities are revealed in the commercial activities carried out by the relevant business units. In this context, the steps to be taken to ensure compliance with the personal data processing conditions stipulated in the GDPR Law are determined.

☑ In order to ensure compliance with the GDPR Law, BMA Technology raises awareness specific to the relevant business units and sets the rules of practice; Necessary administrative measures are implemented through in-house policies and trainings to ensure the supervision of these issues and the continuity of implementation.

☑ In the contracts and documents governing the legal relationship between BMA Technology and employees, except for the instructions of BMA Technology and the exceptions made by law, records that impose the obligation not to process, disclose or use personal data are placed, and awareness of the employees is created and audits are carried out.

☑ In cases where personal data is subject to transfer, records are added to the contracts concluded by BMA Technology with the persons to whom the personal data is transferred, indicating that the party to which the personal data is transferred will fulfill its obligations to ensure data security.

☑ Processing personal data on a business unit basis in accordance with legal compliance requirements

Personal data access and authorization processes are designed and implemented within the company.

☑ Employees cannot disclose the personal data they have learned to others in violation of the provisions of the GDPR Law and cannot use them for purposes other than processing, and that this obligation is not met.

They are informed that they will continue after their resignation and necessary commitments are taken from them in this direction.

b. Technical Measures Taken by BMA Technology to Ensure Legal Processing of Personal Data and to Prevent Unlawful Access to Personal Data

☑ Regarding the protection of personal data by BMA Technology, technical measures are taken as far as technology allows, and the measures taken are updated and improved in parallel with the developments.

☑ In technical matters, expert personnel are employed.

☑ Inspections are carried out at regular intervals for the implementation of the measures taken.

☑ Software and systems are installed to ensure security.

☒ Access to personal data processed within BMA Technology is limited to relevant employees in line with the determined processing purpose, and authorizations are regularly reviewed.

☒ In accordance with the legal compliance requirements determined on the basis of the business unit, access and authorization technical solutions are put into use.

☒ Software and hardware including virus protection systems and firewalls is installed.

☒ Regular security scans are performed to detect security vulnerabilities in applications where personal data is collected. The vulnerabilities found are closed.

☒ The technical measures taken are periodically reported to the relevant person in accordance with the internal audit mechanism, the risky issues are re-evaluated and the necessary technological solution is produced.

c. Carrying out Audit Activities on the Protection of Personal Data by BMA Technology
The compliance, functioning and effectiveness of the technical measures, administrative measures and practices taken by BMA Technology within the scope of protection and security of personal data with the relevant legislation, policies, procedures and instructions are supervised by the General Manager (alternative unit). BMA Technology General Manager can perform the said audit activity through his own organization, or he can have it done by external audit firms when he deems it necessary. The results of the audit activities carried out within this scope are reported to the General Manager of BMA Technology, BMA Technology Finance Directorate and relevant function managers. It is the responsibility of the process owners to regularly monitor the planned actions regarding the audit results. The General Manager also carries out the follow-up, verification tests and audits of the actions within the scope of this report. The activities that will enable the development and improvement of the measures taken regarding the protection of data, without being limited to the audit results, are carried out by the relevant executive units.

D. Measures to be Taken in Case of Unlawful Disclosure of Personal Data

Within the scope of the personal data processing activity carried out by BMA Technology, in the event that personal data is unlawfully obtained by unauthorized persons, the situation will be reported to the GDPR Board and the relevant data owners without delay.

6.7. OBLIGATION TO REGISTER WITH THE REGISTRY OF DATA CONTROLLERS

BMA TEKNOLOJİ is obliged to register in the Data Controllers Registry by submitting the application information and documents listed in the GDPRK within the period to be determined and announced by the Board before starting the data processing. The information to be submitted is as follows (secondary regulations to be issued by the Board and additional information and documents can be requested):

a. Identity and address information of the Company as data controller and its representative, if any,

b. For what purpose personal data will be processed,

c. Explanations about the data subject group and groups and the data categories of these persons,

D. Recipient or recipient groups to whom personal data can be transferred,

to. Personal data intended to be transferred to foreign countries,

f. Measures taken regarding personal data security,

g. The maximum period required for the purpose for which personal data is processed.

6.8. DETERMINATION OF THE UNIT RESPONSIBLE FOR THE PROTECTION AND PROCESSING OF PERSONAL DATA

The Quality Coordinator, as the Data Representative, will provide the necessary coordination within the Company within the scope of ensuring, maintaining and maintaining compliance with the personal data protection legislation by BMA Technology. The Quality Coordinator is responsible for the execution and improvement of the systems established to ensure unity between BMA Technology units and departments, and to ensure that the activities carried out comply with the personal data protection legislation. In this context, the following minimum actions should be taken by the person to be appointed as the Data Representative:

- a. To determine the basic policies regarding the processing and protection of personal data and what needs to be done to comply with the legislation,
- b. Submitting the determined basic policy and action steps to the approval of the senior management; to monitor and coordinate its implementation,
- c. To decide how the policies regarding the processing and protection of personal data will be implemented and how the audit will be carried out, to make necessary assignments after obtaining the approval of the senior management,
- D. To determine the risks that may occur in the personal data processing activities of the company and to ensure that the necessary measures are taken; submitting improvement suggestions to the top management for approval,
- to. To ensure that employees are trained on the protection of personal data and Company policies,
- f. To decide on the applications of personal data owners at the highest level,
- g. To make necessary arrangements within the company for the company to fulfill its obligations under GDPRK,
- h. To follow the developments on the protection of personal data; To advise the senior management on what needs to be done within the scope of these developments,
- l. Managing relations with the Institution and the Board.

7. FINAL NOTE

This Policy document takes effect from the moment it is approved by the BMA Technology Board of Directors. Except for the repeal of this Policy, the BMA Technology Finance Director has been authorized by the BMA Technology Board of Directors for the changes to be made in the Policy and how it will be put into effect. With the approval of the Finance Director, changes in this Policy can be made and put into effect.

In any case, this Policy is reviewed once a year, if necessary changes are made.

It is updated with the approval of the Director.

In case of conflict between the legislation in force on the protection and processing of personal data and the BMA Technology GDPR Policy, BMA Technology accepts that the legislation in force will find an area of application.

BMA Technology GDPR Policy is published on the BMA Technology website <http://www.bma-technology.com/GDPRk> and is accessible to personal data owners. In parallel with the changes and innovations to be made in the relevant legislation, the changes to be made in the BMA Technology GDPR Policy will be made available to the data owners in a way that they can easily access.