



PROTECTION AND PROCESSING OF PERSONAL DATA

All kinds of transactions related to personal data such as obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying or preventing the use of personal data by Agrowork International Limited Company (Company) are carried out in accordance with Article 6698. It determines the procedures and principles for its implementation in accordance with the law, within the framework of the Personal Data Protection Law no. and the relevant legislation (K.V.K.K.).

All units, departments, employees, officials and representatives of the company are obliged to comply with this "Policy". Company Senior Management takes the necessary steps to comply with this Policy.

Shared with the Company and obtained by the Company, to the Company's past, present and future employees, officers, representatives, customers, suppliers, business partners, consultants, service providers and their employees, visitors to the Company facilities and website, and all other real persons connected with the Company. Personal data regarding individuals constitute the subject of the Policy. K.V.K.K. The Policy relates only to personal data of real persons and data of legal entities is not within the scope of the Policy.

With this Policy, K.V.K.K. In case of incompatibility between the legislation and other legislation, the provisions of the legislation and/or law apply.

2. Definitions

Within the scope of Agrowork International, Personal Data Protection and Processing, the terms defined below have the meanings ascribed to them:

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

Explicit Consent: Consent regarding a specific issue, based on information and declared with free will.

Anonymization: Making personal data impossible to associate with an identified or identifiable natural person in any way, even by matching it with other data.

Deletion: Making Personal Data inaccessible and unusable in any way for relevant users.



Processing of Personal Data: Obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, classifying Personal Data, either fully or partially automatically or by non-automatic means, provided that it is part of any data recording system. or any action performed on the data, such as preventing its use.

Personal Data Storage and Destruction Policy: K.V.K.K. Policy No. 6698, which is the basis for data controllers' determination of the maximum period required for the purpose for which personal data is processed and the deletion, destruction and anonymization process. and relevant secondary legislation.

Board: Personal Data Protection Board

Personal Data of Special Nature: Data regarding individuals' race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, association, foundation or union membership, health, sexual life, criminal conviction and security measures, biometric and genetic data.

Policy: Personal Data Protection and Processing Policy.

Company: Agrowork International Limited Company.

Destruction: Making Personal Data inaccessible, irretrievable and unusable by anyone in any way.

3. Principles of Processing of Personal Data

Within the Company, in terms of the Processing of Personal Data, at any time and in any case, K.V.K.K. It is necessary to act in accordance with the following principles listed below:

- The law and the rules of honesty will be followed in the processing of personal data.
- Personal Data will be kept accurate and updated when necessary.
 - Personal Data; It will be processed for specific, clear and legitimate purposes.
 - Personal Data; They will be kept for the period stipulated in the relevant legislation or necessary for the purpose for which they are processed.

4. Rights and Obligations Regarding Personal Data

Disclosure of the Personal Data Owner: To the relevant person during the acquisition of Personal Data by the Company;

- a. K.V.K.K. Identity of the company representative as data controller,



- b. For what purpose Personal Data will be processed
- c. To whom and for what purpose the processed Personal Data can be transferred
- d. Management and legal reason for the total of Personal Data.

The obligation to inform is fulfilled by the company by preparing a clarification text containing the issues listed above and presenting it to the relevant Personal Data owner.

Ensuring Data Security: In ensuring Data Security, the Company complies with K.V.K.K., including the following. and takes all measures foreseen by the relevant legislation or deemed necessary to ensure Data Security;

a. Technical Measures

The Company establishes and has the necessary infrastructure established for recording, transferring, deleting, destroying, anonymizing and any other processing of personal data to third parties.

The company establishes the necessary technical infrastructure and takes technical measures to ensure the security of recorded personal data. These measures are updated in accordance with technological developments and standards to be determined by the board or new legislation.

The company restricts external access to its internal systems and takes firewall and similar technical measures in this context. Inappropriate access is instantly reported to the relevant units and necessary interventions are carried out by the relevant units.

Authorizations regarding access and processing of personal data through the programs used within the company are limited on a department and employee basis.

The established technical infrastructure is regularly inspected and reported.

The company employs or outsources this service regarding the technical measures taken. It ensures that third party institutions and suppliers from which it provides services comply with the legal regulations regarding all services, including but not limited to the technical infrastructure services provided.



b. Administrative Measures

The company's employees, officials and representatives are trained and informed about the lawful processing of personal data. In addition, through internal protocols signed with employees, the obligation to act in accordance with the obligations of K.V.K.K. has been imposed.

Company activities are examined on a departmental basis, and the processing processes and principles of personal data are revealed for each department. Measures to be taken specific to each department are determined and implemented through in-department training.

In case of receiving services or collaborating with third parties for the storage or processing of personal data, in contracts made with these parties; Provisions regarding the legal storage, processing and security of personal data are included.

The Company automatically takes action and implements these decisions when deemed necessary to ensure Personal Data Security and comply with the legislation.

5. Processing of Personal Data

A. Purposes of Processing Personal Data: The personal data obtained by the Company is processed for the following purposes;

- Conducting the daily activities of the company.
- Fulfilling the company's obligations arising from legislation or other legal obligations, including providing information to authorized public institutions and organizations.
- Conducting legal and commercial relations with the company's past, present and future employees, officials, representatives, customers, suppliers, business partners, consultants and service providers, concluding contracts within this scope and processing personal data of the relevant parties for the purpose of fulfilling the contracts.
- Conducting the company's marketing activities.
- Informing the company's past, present and future employees, officials, representatives, partners, customers, suppliers, business partners, consultants and service providers about the business and issues related to the company.
- Conducting corporate communication and management activities.



Strengthening communication and collaboration within the company.

- Execution of Human Resources processes, including recruitment, performance evaluation, employment processes, information to the relevant authorities, applications and private pension transactions.
- Fulfilling obligations in terms of Occupational Health and Safety legislation.
- Execution of corporate governance activities.
- Execution of financial reporting activities.
- Execution of risk management activities.
- Performance of accounting, invoicing and payment activities.
- Execution of internal reporting activities.
- Management of customer feedback and complaints and execution of call center services.
- Ensuring internal data security within the company.

B. Categories of Personal Data to be Processed: By the Company, but not limited to, the following personal data are processed by the Company under K.V.K.K. or may be processed in accordance with the Policy:

a. Within the scope of the purposes listed in Article 5.A and especially the purposes of carrying out the company's daily activities and corporate communication activities; All personal data in the e-mail accounts provided to company employees and in the company's electronic database are accessible to the company, and these personal data are kept and processed by the company.

b. Within the scope of the purposes specified in Article 5.A and the execution of the Company's legal and commercial relations; Past, present and future customers, dealers, suppliers, business partners, consultants, service providers, visitors and their employees in order to conclude contracts, fulfill obligations arising from legislation and/or contracts, carry out marketing activities, and determine the preferences and needs of relevant persons. Identity information, contact information and, if necessary, financial information are recorded.

All or part of this personal data may be used for the purpose of the company's normal activities, conducting legal and commercial relations, concluding contracts within this scope, fulfilling obligations arising from the legislation and contracts to which it is a party, carrying out the company's



marketing and promotional activities, and determining the preferences and needs of the relevant persons. It can be transferred to customers, dealers, suppliers, business partners, consultants and service providers and processed by these persons.

These personal data can be transferred to authorized public institutions and organizations and processed by public institutions and organizations in order to fulfill obligations arising from the law.

c. For the purposes listed in Article 5.A and especially for the execution of Human Resources processes, regarding past, present and future employees, officials and representatives identity information, contact information, personal information, especially the name, surname, date of birth, gender of these persons. Personal data such as identity number and similar personal data and contact information such as photographs, address and telephone number are obtained, recorded and processed.

These personal data may be processed by the Social Security Institution and similar public institutions and organizations in order to fulfill obligations arising from the law.

These personal data can be included in the Company's system and the database module of the Human Resources Department, and these personal data can be accessed and processed by Human Resources in order to strengthen the Company's internal communication and cooperation. It can be transferred to other Company employees through the Human Resources system.

This personal data; It can be transferred for the purpose of providing services such as infirmary, ambulance, security, consultancy provided by subcontractors and travel agency and information technology technical support provided by business partners, and can be processed by subcontractors, consultants and business partners.

From this personal data; Identity information and IBAN numbers are transferred to banks and processed by banks within the scope of payments made to employees, officials and representatives.

This personal identification information, contact information, insurance policies and private pension companies can be transferred to and processed by these companies.



d. For the purposes listed in Article 5.A and especially for the execution of Human Resources processes, personal data obtained through career and employment supporting sites regarding past, current and future employees, officials and representatives are recorded and processed.

e. The purposes listed in Article 5.A, the purposes related to Human Resources processes such as determining the minimum subsistence allowance, providing Private Health Insurance and Private Pension Policy; Identity information of past, present and future employees, officials, representatives' spouses and children and relatives is obtained, records are kept and processed.

f. The purposes set out in Article 5.A and the data obtained through the health forms filled out during workplace doctor visits are recorded and processed within the relevant subcontractor, service provider and company.

g. Within the scope of the purposes listed in Article 5.A and management of customer feedback, complaints and execution of call center services; Customer personal data is obtained, recorded and processed through the call center and/or forms and texts filled out electronically.

h. Within the scope of ensuring security in the company's facilities; Personal data about visitors are obtained, recorded and processed. Only the advisory department and authorized units that process the data can access these data.

i. Personal data regarding the visitors of the company's website can be obtained, recorded and processed.

j. Within the scope of ensuring security in the company's facilities; The company's factories and facilities are monitored with cameras and these images are stored digitally. The monitoring areas of security cameras are limited in number for security purposes. Areas that exceed the purpose of security and may have negative consequences on personal rights (such as toilets) are subject to monitoring. These records, which are kept for security purposes, can be accessed by advisory and authorized units.



k. People who come to the company and company facilities as guests are given a visitor card in exchange for an identity document, and their names and surnames, vehicle information, entry and exit times, information about who they will meet with, and health information are requested from guests who will enter the production area, and Occupational Health and Safety information is provided. The data obtained for the purpose of tracking guest entry and exit is recorded and processed for this purpose.

l. Internet access can be provided to visitors upon request within the company borders. In this case, log records regarding internet access are recorded in accordance with the law no. 5651 and the mandatory provisions of the legislation issued in accordance with this law. These records are processed only upon request by authorized public institutions and organizations or to fulfill our legal obligations during internal audit processes. A limited number of authorized companies and IT employees of information technology service providers have access to the processed log records. These records are accessed only upon request from authorized public institutions or for use in internal audit processes and are shared with legally authorized persons.

C. Explicit Consent for Processing of Personal Data: In the processing of personal data, it is essential to obtain the explicit consent of the relevant person.

K.V.K.K. Within the scope of the explicit consent exception regulations introduced by , it is possible to Process Personal Data by the Company without seeking the explicit consent of the relevant person, if one of the following conditions exists;

a. It is clearly prescribed by law.

b. If the person is unable to express his/her consent due to actual impossibilities, or if the consent is not given legal validity and it is necessary to protect the life or physical integrity of the person or someone else.



It is necessary to process personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract.

d.It is mandatory for the company to fulfill its legal obligations.

e.It has been made public by the person concerned.

f.Data processing is mandatory for the establishment, exercise or protection of a right.

g.It is mandatory to process data for the legitimate interests of the company, provided that it does not harm the fundamental rights and freedoms of the person concerned. The existence of one of these conditions does not eliminate the obligation of the personal data owner to be informed by the company.

D.Special Personal Data: In processing special personal data, it is essential to obtain the explicit consent of the relevant person. However, personal data other than health and sexual life, which are special categories of personal data, may be processed without the explicit consent of the relevant person in cases stipulated by law.

E.Transfer of Personal Data: Personal data obtained by the Company may be transferred to third parties as specified in Article 5.B, in accordance with the purposes of processing personal data.

In transferring personal data to third parties, it is essential to obtain the Express consent of the relevant person.

In case one of the following conditions exists, it is possible for the company to transfer Personal Data to third parties without the explicit consent of the relevant person;

- Clearly prescribed by law.

- The person is unable to express his/her consent due to actual impossibility, or the person's consent is not given legal validity, and it is necessary to protect the life or physical integrity of the person or someone else.

- It is necessary to process personal data of the parties to the contract, provided that it is directly related to the establishment or performance of a contract.

- It is mandatory for the company to fulfill its legal obligations.



- It has been made public by the person concerned.
- Data processing is mandatory for the establishment, exercise or protection of a right.
- It is mandatory to process data for the legitimate interests of the company, provided that it does not harm the fundamental rights and freedoms of the person concerned.
- Special personal data other than health and sexual life may be transferred to third parties in cases stipulated by law, without the explicit consent of the relevant person. The existence of one of these conditions does not eliminate the obligation of the personal data owner to be informed by the company.

F. Transfer of Personal Data Abroad: It is essential that Personal Data is not transferred abroad, and in case of transfer abroad, the express consent of the relevant person is obtained.

- Existence of the conditions stated in Article 5.D.
- There is adequate protection in the foreign country to which the Personal Data will be transferred, or the company's data controller in the foreign country undertakes adequate protection in writing.
- If there is permission from the Board, personal data may be transferred abroad without seeking the express consent of the relevant person.

Transferring duly anonymized information abroad does not constitute the subject of this policy.

G. Storage, Deletion, Destruction and Anonymization and Transfer of Personal Data: Personal data obtained by the Company, if a period of time is stipulated in the legislation for the use or storage of the relevant personal data, during this period; If such a period is not stipulated, it is stored for the period required to achieve the purpose of processing the relevant personal data by the Company and, in any case, for the limitation period determined to assert a right based on the relevant personal data.



If the reasons requiring the processing of personal data disappear, this personal data is deleted, destroyed or anonymized in the first periodic destruction process following the elimination of the reasons, in accordance with the Personal Data Storage and Destruction Policy issued by the company.

Situations such as the fact that the contract between the company and the relevant party has never been established, is not valid, terminates automatically, is terminated or withdrawn from the contract, processing personal data is against the law or the rules of honesty, are examples of cases where the reasons requiring the Processing of Personal Data are eliminated.

K.V.K.K. of the relevant person whose personal information is processed. If an application is made to the data controller to exercise its rights to request deletion, destruction or anonymization, the company evaluates the application within 30 days and informs the relevant person. If all the conditions for processing personal data are eliminated, the company accepts the application and carries out the destruction within the period. If all the conditions for processing personal data have not been eliminated, this request will be rejected in writing within the time limit, explaining the reason.

6. Publishing and Updating the Personal Data Protection and Processing Policy
Agrowork International K.V.K.K. The policy is published on the company's website (<http://awi.com.tr>) and is made available to personal data owners upon request.
Agrowork International K.V.K.K. The policy is updated when necessary or necessary.

7. Enforcement

Agrowork International K.V.K.K. The policy came into force by the company on .../.../....