PERSONAL DATA PROTECTION POLICY

At Biltim Bilgisayar Hizmetleri AŞ (“Biltim” / “the Company”), we prioritize safeguarding people’s fundamental rights and freedoms. We regard protecting privacy, ensuring and maintaining information security, and upholding ethical values as paramount principles.

This personal data protection policy (“Policy”) has been prepared to ensure that the personal data of any individual interacting with the Company, including those who benefit from the Company’s products and services, is processed in accordance with the requirements of the Protection of Personal Data Act (Statute 6698) (“KVKK” / “the Act”) and the relevant secondary legislation ; to define the personal data processing activities of our company in general terms and to inform the data subjects. .

1. Definitions

Certain terms and expressions are used in this Policy as defined below:

• Personal data: Any information relating to an identified or identifiable natural person;

• Personal data processing: any operation or set of operations which is performed on personal data or on sets of personal
data, whether or not by automated means, such as collection, recording, organization, structuring, storage,
adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making
available, alignment or combination, restriction, erasure or destruction;

• The Board: The Personal Data Protection Board;

• The Authority: The Personal Data Protection Authority;

• Sensitive personal data: Any data relating to an individual’s racial or ethnic origins, political opinions, religious or philosophical beliefs, or trade union membership; health or sexual orientation; criminal convictions or offences; biometric or genetic makeup;

• VERBİS: Data Controllers’ Registry Information System;

• Data controller: Any natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of processing of personal data; for the purposes of this Policy, Biltim;

• Data processor: Any third-party natural or legal person, public authority, agency or other body which processes personal data on behalf of the data controller or based on instructions from the data controller;

Data filing system: Any system used by Biltim for processing data structured according to specific criteria;

• Data subject: Any natural person whose personal data is processed.

2. General information about personal data processing

In the conduct of its operations, Biltim effectively manages information security and personal privacy to minimize information security-related losses, to reduce the risk of information security or personal privacy breaches, and to ensure a coordinated response to breaches if they occur; Biltim strives to prevent disruptions in critical business processes and/or services, ensuring their restoration to working order within targeted recovery times if disruptions arise; Biltim ensures that all business processes are integrated into and compatible and aligned with these objectives. Biltim's personal data objectives encompass the purposes outlined in this Policy as well as those specified in the Company's articles of association as registered and announced by the government trade registry.

For the purpose of carrying out its activities and operations, Biltim may collect personal data from visitors, supplier representatives & employees, interns, shareholders / partners, employees, job applicants, customer employees & representatives as well as from any parents, guardians, or representatives and from website visitors. Such data may be associated with the following data categories: Personal identity, Addresses & telephone numbers, Personnel files, Legal transactions, Customer transactions, Physical premises security, Transaction security, Risk management, Finance, Professional experience, Health, Previous criminal convictions & offenses, Employees' family members & relatives, Employees' rights & benefits, Job applications.

3. How and why personal data is collected

Biltim collects your personal data from its own units, affiliated group companies, websites, social media platforms, third parties, and statutory authorities. This data may be harvested from emails, faxes, telephone calls, SMS messages, postal and courier service providers, virtual environments, and hand-delivered contracts and application forms.

Biltim collects, uses, records, stores, and processes your personal data in a manner that is legal and truthful, for legitimate purposes that are clearly stated upfront, and to a limited and proportionate degree. As the data subject, you are advised of what the Company does in language that is clear and understandable and, when necessary, your explicit consent is obtained, if necessary.

Your personal data may be processed based on the following legal grounds under Article 5/2 of the KVKK and shared with the following persons and institutions:

• It is expressly allowed by law;

• It is necessary to protect the life or physical safety of data subjects themselves or of any other person who is unable to give their consent due to physical disability or whose consent is not deemed legally valid;

• It is necessary to process the personal data of contractual parties, provided that such processing is directly related to the establishment or performance of the contract;

• The data controller has a legal obligation to process the data;

• The personal data has already been publicly disclosed by data subjects themselves;

• The data must be processed to establish, exercise, or protect any right;

• The data controller has a legitimate interest in processing the data, on condition that such processing does not violate the fundamental rights and freedoms of the data subject;

• The data subject explicitly consents to the processing.

4. Why personal data may be processed

Biltim processes data physically and/or electronically exclusively for the purposes and reasons given below and only to the extent dictated by them.

Personal data may be processed physically and/or electronically only for the reasons indicated below and only if the data is associated with one or more of these data categories: Personal identity, Addresses & telephone numbers, Personnel files, Legal transactions, Customer transactions, Physical premises security, Transaction security, Risk management, Finance, Professional experience, Health, Previous criminal convictions & offenses, Employees' family members & relatives, Employees' rights & benefits, Job applications.

Data may be processed for the purposes of:

• Providing or procuring goods or services provided or procured by the Company or its subsidiaries and affiliates ("Çolakoğlu Group companies") and conducting of any business associated therewith;

• Communicating with someone about products or services they have provided or procured;

• Protecting the legal or commercial interests of the Company, of any Çolakoğlu Group entity, or of any person involved in a business relationship with the Company; ensuring and protecting the physical security of Company-owned premises;

• Assessing the Company's or Çolakoğlu Group companies' customers, suppliers, business partners (including their officers and employees);

• Conducting such processes as reputation research, event management, legal compliance, auditing, financial affairs, and the like;

• Identifying and implementing the Company's commercial and business strategies;

• Complying with the Company's principles and policies;

• Customizing recommendations about Company-offered products and services according to its customers' preferences, habits, or needs; increasing customer satisfaction; and managing marketing and advertising processes; as well as conducting electronic and/or physical surveys through contractually-bound agencies for such purposes;

• Ensuring that data is accurate and up-to-date for the conduct of legal, technical, or administrative processes;

• Managing contractual processes;

• Creating and maintaining visitor records; planning and conducting IT processes; managing IT system-access authorities;

• Ensuring information security;

• Managing legal affairs; ensuring that operations comply with laws and regulations.

5. Transferring personal data

Transfer of personal data to recipients in Turkey

As required by Article 8 of KVKK and subject to the reasons and purposes set forth respectively in articles §3 and §4 of this Policy, Biltim may transfer personal data to the individuals and organizations residing in Turkey indicated below:

• The Company's direct or indirect shareholders and subsidiaries & affiliates;

• Any individual, company, business partner, or supplier from which the Company procures any consultancy or other services;

• Any statutorily authorized public agency or organization.

Transferring personal data to other countries

Under Article 9 of KVKK , Biltim may transfer personal data to other countries and may process it there only with the explicit consent of the data subject. However, the Act allows Biltim to transfer personal data to another country without the data subject's explicit consent if any of the conditions set forth in §3 of this Policy are satisfied. Nevertheless, Biltim may do this only:

• If personal data is afforded adequate protection in the country to which it is to be transferred or

• If adequate protection is not afforded in the destination country, then only with the permission of the Board subject to the condition that Biltim or the data controllers or processors in the destination country commit themselves in writing to protect the data adequately.

Without prejudice to the provisions of international agreements, in situations where the international transfer of personal data would be seriously detrimental to the interests of Turkey or of the data subject, Biltim may transfer it abroad only with the permission of the Board, subject to the favorable opinion of an authorized public agency or organization.

Biltim does not share your personal data with any third party located abroad.
Processing & transferring sensitive personal data

Biltim may process and transfer sensitive personal data only with your explicit consent; however data related to matters of health or sexual orientation may be processed without the

data subject's consent, but only by persons sworn to data confidentiality (*such as a workplace physician*) or by competent public agencies and organizations and only for the purposes of protecting public health, practicing preventive medicine, conducting medical diagnoses, providing medical treatment & care services, or planning and managing healthcare services and their financing.

6. Personal data security

Biltim takes all necessary technical and administrative precautions to ensure that data security is maintained at a level that is sufficient to prevent unlawful processing of personal data, preclude unlawful access to personal data, and safeguard personal data. Bilte-im employs methods outlined below to ensure the accuracy and timeliness of the personal data that it retains.

Whenever personal data is processed on Biltim's behalf by any other person or legal entity (data processor), both Biltim and the data processor are jointly responsible for ensuring that the precautions specified in this Policy are taken.

Biltim also conducts the necessary audits in its own institution or organizations and, if possible, before it's data processors in order to ensure the implementation of the provisions of KVKK.
If personal data processed by Biltim is obtained by others through unlawful means, Biltim will inform the data subject and the Board within a maximum of 72 hours. The Board may in turn and if necessary, announce this breach on its website or by any other means it sees fit.

7. Retention Period and Destruction of Personal Data

When deciding how long it will retain your personal data, Biltim is mindful of the requirements of laws and regulations governing this issue. Subject to those requirements, personal data is retained only so long as the reasons for processing it exist. If the reasons no longer exist and if there is no other legal cause or justification for retaining it, personal data is periodically disposed of at Company-determined intervals or at the request of the data subject. The prescribed methods of disposal are erasure, destruction, and anonymization.

If there is no longer a reason for processing your personal data and/or if the data-retention period mandated by the Act or determined by the Company has expired, the data will be retained for no longer than statutorily-prescribed periods of time and only so that the data may be used as evidence in a potential legal dispute or to allow the assertion or defense of a right associated with your personal data. In such cases, your retained personal data will be inaccessible for any other reason and will remain so until and unless it is needed as admissible evidence in litigation. At the end of its prescription period, all personal data is erased, destroyed, or anonymized.

8. Your rights as a personal data subject

The Act gives you the right to apply to the Company:

• To learn whether or not your personal data is being/has been processed;

• If your personal data has been processed, to demand information about such processing;

• To learn why your personal data is being/has been processed and whether or not it is being used appropriately;

• To be made aware of any third parties in Turkey or abroad to whom your personal data has been transferred;

• If your processed personal data is incomplete or incorrect, to request that the inaccuracies be rectified or that the data be erased or destroyed as prescribed by Article 7 of KVKK;

• If your personal data has been subjected only to automated processing, to object to any outcome of such processing that is detrimental to you;

• To demand compensation for any losses you may suffer as a result of any unlawful processing of your personal data.

To exercise any of these rights, you should contact Biltim in writing, identifying yourself and providing a clear and concise explanation of the right(s) you wish to exercise. You may send this request to either or both of the following addresses:

• By post to Ruzgarlibahce Mah. Çam Pınarı Sk. No:1 İç Kapı No:12 Beykoz, İstanbul

• By email to kvkk@biltim.com.tr

Biltim may make such revisions in this Policy as may be necessitated by its operations or by the requirements of law. All such changes go into effect immediately upon the publication of the revised Policy on the Company's www.biltim.com.tr website.