



**PERSONAL DATA
PROTECTION and
PROCESSING POLICY**

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PERSONAL DATA PROTECTION and PROCESSING POLICY

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1. INTRODUCTION

1.1 Purpose and Scope of the Policy

Law No. 6698 on the Protection of Personal Data (hereinafter referred to as the "Law" and/or "KVKK") entered into force on April 7, 2016; This QVV Mühendislik Sanayi Ve Ticaret Limited Şirketi Personal Data Processing and Protection Policy (hereinafter referred to as the "Policy"), QVV Mühendislik Sanayi Ve Ticaret Limited Şirketi (hereinafter referred to as the "Company") aims to ensure compliance with the Law and to determine the principles to be followed by the Company in fulfilling its obligations regarding the protection and processing of personal data.

The Policy determines the conditions for processing personal data and sets out the main principles adopted by the Company in the processing of personal data. Within this framework, the Policy covers all personal data processing activities carried out by the Company within the scope of the Law, the owners of all personal data processed by the Company and all personal data processed by the Company.

Matters regarding the processing of personal data of Company Employees are not covered by this policy and are separately regulated in QVV Mühendislik Sanayi Ve Ticaret Limited Şirketi Employee Personal Data Processing and Protection Policy.

Definitions of terms used in the Policy are provided in Annex 1.

1.2 Enforcement and Amendment

The Policy has been published by the Company on <http://qvv.com.tr/> and made public. In case of any conflict between the legislation in force, particularly the Law, and the regulations set forth in this policy, the provisions of the legislation shall apply.

The Company reserves the right to make changes in the policy in line with legal regulations. The current version of the policy is available at <http://qvv.com.tr/>.

2. DATA SUBJECTS, DATA PROCESSING PURPOSES AND DATA CATEGORIES FOR THE PERSONAL DATA PROCESSING ACTIVITIES CARRIED OUT BY OUR COMPANY

2.1 Data Subjects

Data subjects within the scope of the Policy are all natural persons other than Company employees whose personal data are processed by the Company. In this context, the categories of data subjects are as follows:



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- Employee/ Candidate Employee/ Intern
- Suppliers
- Customers
- Visitors
- Third parties and/or persons with whom our Company has relations within the scope of its interests and legal responsibilities

The categories of data subjects are specified for general information sharing purposes. The fact that the data subject does not fall within the scope of any of these categories does not eliminate the nature of the data subject as stated in the Law.

2.2 Purposes of Processing Personal Data

Your personal data and sensitive personal data may be processed by the Company for the following purposes in accordance with the personal data processing conditions set forth in the Law and the relevant legislation:

MAIN PURPOSES	(y)
Carrying out the necessary work by our relevant business units for the realization of the activities carried out by the Company and carrying out the related business processes	<ol style="list-style-type: none">1. Planning and execution of business activities2. Event management3. Planning and execution of corporate communication activities4. Planning of information security processes5. Establishment and management of information technology infrastructure6. Planning and execution of business continuity activities7. Establishment and management of information technology infrastructure8. Planning, auditing and execution of information security processes
Planning and Execution of the Company's Human Resources Policies and Processes	<ol style="list-style-type: none">1. Planning human resources processes2. Fulfillment of the obligations arising from the employment contract and legislation for the employee3. Monitoring and supervision of the work activities of the employee/candidate and interns4. Corporate communication for employees/candidates and interns and planning and execution of corporate social responsibility and non-governmental organizations activities in which employees participate5. Planning and execution of benefits and perks for employees/candidates and trainees6. Execution of human resources procurement processes7. Planning and follow-up of Performance Evaluation processes8. Planning and execution of employee exit procedures9. Planning and execution of employee/candidate satisfaction and engagement processes



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	<ol style="list-style-type: none"> 10. Planning and execution of the processes of receiving and evaluating employee suggestions for the improvement of Company processes
Planning and Execution of the Company's Operational, Commercial and Business Strategies	<ol style="list-style-type: none"> 1. Planning and execution of programs and trainings offered by the Company in terms of scope and content 2. Management of relationships with business partners and suppliers
Ensuring the legal, technical and commercial-business security of the Company and related persons who are in business relations with the Company	<ol style="list-style-type: none"> 1. Ensuring the security of the Company's premises and facilities 2. Creation and follow-up of visitor records 3. Providing information to authorized institutions due to legislation 4. Planning and execution of occupational health and safety processes 5. Ensuring the security of company operations 6. Ensuring the security of company fixtures and resources
Planning and execution of the activities necessary for the presentation, recommendation and promotion of the Company's services to the relevant persons	<ol style="list-style-type: none"> 1. Planning and execution of Company services 2. Planning and execution of marketing processes of the Company's services 3. Planning and execution of market research activities 4. Planning and execution of processes to create and increase loyalty to the company 5. Planning and execution of company satisfaction activities

Your personal data and sensitive personal data may be processed by the Company for the following purposes in accordance with the personal data processing conditions set forth in the Law and the relevant legislation:

MAIN PURPOSES	SUBPURPOSES
Carrying out the necessary work by our relevant business units for the realization of the activities carried out by the Company and carrying out the related business processes	<ol style="list-style-type: none"> 1. Event management 2. Planning and execution of business activities 3. Planning and execution of corporate communication activities 4. Planning, auditing and execution of information security processes 5. Establishment and management of information technology infrastructure 6. Planning and execution of authorizations of business partners and suppliers to access information 7. Follow-up of financial and accounting affairs 8. Planning and execution of corporate sustainability activities 9. Planning activities for conducting effectiveness/efficiency and relevance analysis of business activities 10. Planning and execution of corporate governance activities 11. Planning and execution of business continuity activities



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	<ul style="list-style-type: none"> 12. Planning, support and execution of research and development activities 13. Planning and execution of Company training activities 14. Management of relationships with business partners and suppliers 15. Execution of strategic planning activities 16. Planning and execution of programs and trainings offered by the Company in terms of scope and content
<p>Planning and Execution of the Company's Human Resources Policies and Processes</p>	<ul style="list-style-type: none"> 1. Planning and execution of Talent and Career development activities 2. Corporate communication for employees/candidates and interns and planning and execution of corporate social responsibility and non-governmental organizations activities in which employees/candidate employees and interns participate 3. Fulfillment of the obligations arising from the employment contract and legislation for the employee 4. Planning and execution of employee benefits and perks 5. Planning and execution of internal compliance activities 6. Planning and execution of employee exit procedures 7. Wage management 8. Planning of human resources processes 9. Execution of human resources procurement processes 10. Planning and execution of internal appointment-promotion and resignation processes 11. Planning and monitoring of performance evaluation processes 12. Monitoring and supervision of the work activities of the employee/candidate and interns 13. Planning and execution of internal training activities 14. Planning and execution of employee/candidate satisfaction and engagement processes 15. Planning and execution of employee/candidate's and interns' authorization to access information 16. Planning wage increases 17. Planning and execution of the processes of receiving and evaluating employee suggestions for the improvement of organizational processes
<p>Planning and execution of the activities necessary for the presentation, recommendation and promotion of the services offered by the Company to the relevant persons</p>	<ul style="list-style-type: none"> 1. Planning and execution of market research activities 2. Planning and execution of processes to create and increase loyalty to the company 3. Planning and execution of marketing processes of the Company's services 4. Planning and execution of Company programs and services 5. Planning and execution of company satisfaction activities



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Ensuring the legal, technical and commercial-business security of the Company and the related persons in relation with the Company	<ol style="list-style-type: none">1. Follow-up of legal affairs2. Planning and execution of the necessary operational activities to ensure that the Company's activities are carried out in accordance with corporate procedures and relevant legislation3. Providing information to authorized institutions due to legislation4. Creation and follow-up of visitor records5. Planning and execution of emergency management processes6. Planning and execution of company audit activities7. Planning and execution of occupational health and safety processes8. Ensuring that data is accurate and up-to-date9. Ensuring the security of the Company's premises and facilities10. Ensuring the security of company activities11. Planning and execution of the Company's financial risk processes12. Planning and execution of the Company's commercial risk processes13. Ensuring the security of the company's fixtures and resources
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2.3 Categories of Personal Data

Your personal data categorized below are processed by the Company in accordance with the personal data processing conditions in the Law and the relevant legislation:

PERSONAL DATA CATEGORIZATION	DESCRIPTION
Identity Information	All information about the identity of the person in documents such as driver's license, identity card, passport, lawyer ID, marriage certificate
Contact Information	Information for contacting the data subject such as phone number, address, residence, e-mail
Location Data	Data which clearly belongs to an identified or identifiable natural person and which are included in the data recording system and which are used to determine the location of the data subject
Family Members and Relatives	Information about the family members and relatives of the personal data owner, which clearly belongs to an identified or identifiable natural person and is included in the data recording system and processed in order to protect the legal interests of the relevant Institution and the data owner



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Risk Management Information	Personal data that clearly belongs to an identified or identifiable natural person and is included in the data recording system and processed in order to manage the commercial, technical and administrative risks of the Company
Physical Space Security Information	Personal data related to records and documents such as camera recordings, fingerprint records taken at the entrance to the physical space, during the stay in the physical space
Transaction Security Information	Your personal data processed to ensure our technical, administrative, legal and commercial security while conducting our commercial activities
Financial Information	Personal data processed regarding information, documents and records showing all kinds of financial results created according to the type of legal relationship established by our company with the personal data owner
Employee Candidate Information	Personal data processed in relation to individuals who have applied to become an employee of our Company or who have been evaluated as employee candidates in line with the human resources needs of our Company in accordance with the commercial custom and honesty rules or who are in a working relationship with our Company
Legal Procedure and Compliance Knowledge	Personal data processed within the scope of determination and follow-up of our legal receivables and rights and performance of our debts and compliance with our legal obligations and Company policies
Audit and Inspection Information	Personal data processed within the scope of our Company's legal obligations and compliance with Company policies
Sensitive Personal Data	Data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data are sensitive personal data.
Marketing Information	Data that clearly belongs to an identified or identifiable natural person and is included in the data recording system and will be used by the Company in marketing activities
Request/Complaint Management Information	Personal data regarding the receipt and evaluation of any request or complaint addressed to our Company



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Reputation Management Information	Information about the information collected for the purpose of protecting our Company's commercial reputation and the evaluation reports and actions taken in this regard
Incident Management Information	Personal data processed in order to take necessary legal, technical and administrative measures against developing events in order to protect the commercial rights and interests of our company
Audio and Visual Data	Visual and audio recordings that clearly belong to an identified or identifiable natural person and are associated with the personal data subject and are included in the data recording system

3. PRINCIPLES AND CONDITIONS REGARDING THE PROCESSING OF PERSONAL DATA

3.1. Principles Regarding the Processing of Personal Data

Your personal data is processed by the Company in accordance with the personal data processing principles set out in Article 4 of the Law. These principles must be complied with for each personal data processing activity:

- **Processing of personal data in accordance with the law and good faith;** The Company acts in accordance with the laws, secondary regulations and general principles of law in the processing of your personal data; attaches importance to processing personal data limited to the purpose of processing and taking into account the reasonable expectations of data subjects.
- **Personal data is accurate and up-to-date;** The Company pays attention to whether your personal data processed by the Company is up to date and to carry out the relevant checks. In this context, data subjects are given the right to request correction or deletion of their inaccurate and outdated data.
- **Processing of personal data for specific, explicit and legitimate purposes;** The Company determines the purposes of data processing before each personal data processing activity and ensures that these purposes are not unlawful.
- **Personal data is relevant, limited and proportionate to the purpose for which it is processed;** Data processing activity by the Company is limited to the personal data required to fulfill the purpose of collection and necessary steps are taken to ensure that personal data not related to this purpose are not processed.
- **Retention of personal data for the period required by the legislation or the purposes of processing;** Personal data are deleted, destroyed or anonymized by the Company after the purpose of personal data processing disappears or upon expiration of the period stipulated in the legislation.



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3.2. Conditions Regarding the Processing of Personal Data

Your personal data is processed by the Company in the presence of at least one of the personal data processing conditions specified in Article 5 of the Law. Explanations regarding these conditions are given below:

- ***In cases where there is explicit consent of the personal data owner*** and other data processing conditions do not exist, in accordance with the general principles under the heading 3.1., the personal data of the data owner can be processed by the Company with the free will of the data owner, having sufficient information about the personal data processing activity, in a manner that leaves no room for hesitation and only limited to that transaction.
- ***In the event that the personal data processing activity is explicitly stipulated in the laws***, personal data may be processed by the Company without the explicit consent of the data subject. In this case, the Company will process personal data within the framework of the relevant legal regulation.
- ***In the event that the explicit consent of the data subject cannot be obtained due to actual impossibility and personal data processing is mandatory***, personal data belonging to the data subject who is unable to disclose his/her consent or whose consent cannot be validated by the Company will be processed in the event that personal data processing is mandatory to protect the life or physical integrity of the data subject or a third person.
- ***If the personal data processing activity is directly related to the establishment or performance of a contract***, personal data processing activity will be carried out if it is necessary to process personal data belonging to the parties of the contract established or already signed between the data subject and the Company.
- ***In the event that it is mandatory to carry out personal data processing activities in order to fulfill the legal obligation of the data controller***, the Company processes personal data in order to fulfill its legal obligations stipulated under the applicable legislation.
- ***If the data owner has made his/her personal data public***, personal data that has been disclosed to the public in any way by the data owner and made publicly available to everyone as a result of publicization may be processed by the Company limited to the purpose of publicization, even without the explicit consent of the data owners.
- ***In the event that personal data processing is mandatory for the exercise or protection of a right***, the Company may process the personal data of the data subject without the explicit consent of the data subjects within the scope of the obligation.
- ***Provided that it does not harm the fundamental rights and freedoms of the data subject, if data processing is mandatory for the legitimate interests of the data controller***, personal data may be processed by the



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Company, provided that the balance of interests of the Company and the data subject is observed. In this context, in the processing of data based on legitimate interest, the Company first determines the legitimate interest to be obtained as a result of the processing activity. It evaluates the possible impact of the processing of personal data on the rights and freedoms of the data subject and performs the processing activity if it is of the opinion that the balance is not disturbed.

3.3. Conditions for Processing Sensitive Personal Data

In Article 6 of the Law, special categories of personal data are specified in a limited number. These are; race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership to associations, foundations or trade unions, health, sexual life, criminal conviction and security measures, and biometric and genetic data.

The Company may process special categories of personal data in the following cases by ensuring that additional measures determined by the Personal Data Protection Board are taken:

- **Processing of sensitive personal data other than health and sexual life**, can be processed if the data subject gives explicit consent or if it is explicitly stipulated by law.
- **Personal data relating to health and sexual life**, can only be processed for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, by persons or authorized institutions and organizations under the obligation of confidentiality, without seeking the explicit consent of the data subject.

4. TRANSFER OF PERSONAL DATA

In accordance with the additional regulations listed in Articles 8 and 9 of the Law and determined by the Personal Data Protection Board, the Company may transfer personal data domestically or abroad in case the conditions for the transfer of personal data are met.

- **Your personal data may be transferred by the Company to third parties in the country**, provided that at least one of the data processing conditions specified in Articles 5 and 6 of the Law and explained under Title 3 of this Policy exists and the basic principles regarding the data processing conditions are complied with.
- **In cases where the transfer of personal data to third parties abroad**, does not have the explicit consent of the person, your personal data may be transferred abroad by the Company in the presence of at least one of the data processing conditions specified in Articles 5 and 6 of the Law and explained under Title 3 of this Policy and provided that the basic principles regarding the data processing conditions are complied with.

In the event that the country to which the transfer will be made is not one of the safe countries to be announced by the Personal Data Protection Board, personal data may be transferred to third parties abroad



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upon the written commitment of the Company and the data controller in the relevant country to adequate protection, upon the Personal Data Board's authorization of this processing and in the presence of at least one of the data processing conditions specified in Articles 5 and 6 of the Law (see Policy Title 3).

Within the general principles of the Law and the data processing conditions in Articles 8 and 9, the Company may transfer data to the parties categorized in the table below.

SHARED CATEGORIZATION	PARTY	SCOPE	PURPOSE OF TRANSFER
Business Partner		Parties with which the Company establishes business partnerships while conducting its commercial activities	Sharing of personal data limited to the purpose of ensuring the fulfillment of the purposes for which the business partnership was established
Supplier		Parties that provide services for the Company to continue its commercial activities in line with the instructions received from the Company and based on the contract with the Company	Transfer limited to the receipt of outsourced services from the supplier
Legally Authorized Public Authority		Public institutions and organizations legally authorized to receive information and documents from the Company	Sharing personal data limited to the purpose of requesting information by the relevant public institutions and organizations
Legally Authorized Private Institution		Private law persons legally authorized to obtain information and documents from the Company	Sharing data limited to the purpose requested by the relevant private law persons within their legal authority

5. DISCLOSURE AND RIGHTS OF DATA SUBJECTS

According to Article 10 of the Law, data subjects must be informed about the processing of personal data before or at the latest at the time of processing personal data. Pursuant to the relevant article, the necessary internal



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structure has been established to ensure that data subjects are informed in all cases where personal data processing activities are carried out by the Company as the data controller. In this context;

- Please refer to section 2.2 of the Policy for the purpose of processing your personal data.
- Please see Section 4 of the Policy for the parties to whom your personal data is transferred and the purpose of transfer.
- Please refer to sections 3.2 and 3.3 of the Policy to review the conditions for processing your personal data, which can be collected through different channels in physical or digital environments.
- As a data subject, we would like to state that you have the following rights in accordance with Article 11 of the Law:
 - Learn whether your personal data is being processed,
 - Request information if your personal data has been processed,
 - To learn the purpose of processing your personal data and whether they are used in accordance with their purpose,
 - To know the third parties to whom your personal data is transferred domestically or abroad,
 - To request correction of your personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom your personal data has been transferred,
 - To request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear, although it has been processed in accordance with the provisions of the Law and other relevant laws, and to request notification of the transaction made within this scope to third parties to whom your personal data has been transferred,
 - To object if a result arises against you by analyzing the processed data exclusively through automated systems,

In case you suffer damage due to the processing of your personal data in violation of the Law, to demand the compensation of the damage.

You can submit your applications for your rights listed above to our Company by filling out the Company Data Owner Application Form available on the Company's website. Depending on the nature of your request, your applications will be finalized free of charge as soon as possible and within thirty days at the latest; however, if the transaction requires an additional cost, you may be charged a fee according to the tariff to be determined by the Personal Data Protection Board.



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During the evaluation of the applications, the Company first determines whether the person making the request is the real right holder or not. In addition, the Company may request detailed and additional information for a better understanding of the request when deemed necessary.

Responses to data subject applications by the Company are notified to data subjects in writing or electronically. If the application is rejected, the reasons for rejection will be explained to the data subject with justification.

If personal data is not obtained directly from the data subject; by the Company;

- 1) Within a reasonable period of time from the acquisition of the personal data,
- 2) In the event that personal data will be used for communication purposes with the data subjects, during the first contact establishment,
- 3) If personal data is to be transferred, activities are carried out to inform data subjects at the latest at the time of the first transfer of personal data.

6. DELETION, DESTRUCTION, ANONYMIZATION OF PERSONAL DATA

In accordance with Article 7 of the Law, although it has been processed in accordance with the law, in the event that the reasons requiring its processing disappear, the Company deletes, destroys or anonymizes the personal data ex officio or upon the request of the data owner in accordance with the policies published by the Company.

7. SCOPE OF THE LAW AND LIMITATIONS ON ITS APPLICATION

The following situations are excluded from the scope of the Law:

- Processing of personal data by natural persons within the scope of activities related to themselves or their family members living in the same residence, provided that personal data are not disclosed to third parties and the obligations regarding data security are complied with.
- Processing of personal data for purposes such as research, planning and statistics by anonymizing them with official statistics.
- Processing of personal data for artistic, historical, literary or scientific purposes or within the scope of freedom of expression, provided that such processing does not violate national defense, national security, public security, public order, economic security, privacy or personal rights or constitute a crime.
- 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 security, public order or economic security.
- Processing of personal data by judicial or enforcement authorities in relation to investigations, prosecutions, trials or executions.



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In the cases listed below, the Company is not required to inform the data subjects and the data subjects will not be able to use their rights set forth in the Law, except for their rights regarding the compensation of their damages:

- Processing of personal data is necessary for the prevention of crime or criminal investigation.
 - Processing of personal data made public by the data subject himself/herself.
 - Personal data processing is necessary for the execution of supervisory or regulatory duties and disciplinary investigation or prosecution by the authorized and authorized public institutions and organizations and professional organizations in the nature of public institutions based on the authority granted by the Law.
- Processing of personal data is necessary for the protection of the economic and financial interests of the State in relation to budgetary, tax and fiscal matters.

ANNEX 1: DEFINITIONS

DEFINITION	
Open Consent	Consent on a specific subject, based on information and expressed with free will
Anonymization	Making personal data impossible to be associated with an identified or identifiable natural person under any circumstances, even by matching with other data
Employee	Real persons who are employees of the company
Employee Candidate	Real persons who are not employees of the Company, but who have the status of candidate employee of the Company through various methods
Personal Health Data	Any health information relating to an identified or identifiable natural person
Personal Data	Any information relating to an identified or identifiable natural person
Data Subject	Natural person whose personal data is processed
Processing of Personal Data	Any operation performed on 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 fully or partially automatic means or by non-automatic means provided that it is part of any data recording system
Law	Law No. 6698 on the Protection of Personal Data published in the Official Gazette dated April 7, 2016 and numbered 29677
Sensitive Personal Data	Data on race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, clothing, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data
Policy	QVV Mühendislik Sanayi Ve Ticaret Limited Şirketi Company Policy on Processing and Protection of Personal Data
Company/Firm	QVV Mühendislik Sanayi Ve Ticaret Limited Şirketi
Business Partners	Persons with whom the Company has established partnerships within the scope of contractual relations within the framework of its commercial activities
Data Subject	Natural person whose personal data is processed
Data Processor	Natural and legal person who processes personal data on behalf of the data controller based on the authorization granted 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