

PERSONAL DATA PROTECTION AND PROCESSING POLICY

I. Introduction

With this policy, within the framework of the Personal Data Protection Law (Law) and relevant national legislation no. 6698; the rules to be followed with the principles adopted by **LOCAL STORY BODRUM** (Data Controller) regarding the collection, processing, transfer, update, and destruction of personal data have been determined.

II. Policy Holder

The owner of Personal Data Protection and Processing Policy is **LOCAL STORY BODRUM** as the Data Controller.

III. Purpose

With this policy, it is aimed to provide explanations about the rules adopted by the Data Controller for the processing of personal data and the protection of personal data; in this context, it is aimed to ensure transparency and inform the persons whose personal data are processed by our company, business partners, employees and candidate employees, current and potential customers, shareholders, visitors and third parties.

IV. Scope

This policy covers shareholders and partners, employees, candidate employees, interns, sub-contractors, suppliers, current and potential customers, visitors and third parties.

V. Update

Personal Data Protection and Processing Policy is reviewed and recorded once a year regardless of the change requirements in its corporate or legal content. The most up-to-date version is published on the data controller's website.

VI. Definitions

Definitions not included herein shall be used as defined in the Law and regulations.

- *Explicit Consent*: Freely given, specific and informed consent.
- *Anonymization*; Rendering personal data impossible to link with an identified or identifiable natural person, even though matching them with other data.
- *Obligation to Inform*: At the time when personal data are obtained, the data controller or the person authorised by it is obliged to inform the data subjects the identity of the data controller and of its representative, if any; the purpose of processing of personal data; to whom and for which purposes the processed personal data may be transferred; the method and legal basis of collection of personal data and other rights referred by Law.
- *Data Subject*: Natural person whose personal data are being processed.
- *Personal Data*: Refers to any information relating to an identified or identifiable natural person; such as name, surname, date of birth and place of birth of the persons, information about the physical, family, economic and other characteristics of the person, name, telephone number, motor vehicle license plate, social security number, passport number.
- *Processing of Personal Data*: Refers to any operation which is performed on personal data, wholly or partially by automated means or non-automated means which provided that form part of a data filing system, such as collection, recording, storage, protection, alteration,

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adaptation, disclosure, transfer, retrieval, making available for collection, categorization, preventing the use thereof.

- *Special Categories of Personal Data*: Refers to personal data relating to the race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, membership to associations, foundations or trade-unions, data concerning health, sexual life, criminal convictions and security measures, and the biometric and genetic data.
- *Data Processor*: Means the natural or legal person who processes personal data on behalf of the data controller upon its authorization.
- *Data Controller*: Means the natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data filing system.
- *Data Controllers' Registry (VERBÍŠ)*: Data Controllers' Registry (VERBÍŠ) is an information system that is accessible on the Internet and established and managed by the Presidency under supervision of the Board which is the managing body of the Authority (Personal Data Protection Authority), that data controllers will use for the registration with the Registry and the other operations related to the Registry.

VII. Data Subject

Personal data of the employee, candidate employee, person appearing in news, shareholder/partner, potential customer, intern, supplier's employee, supplier' officer, customer, parent/custodian/representative, visitors, etc. natural persons are processed.

VIII. Data Categories

Identity, communication, location, personal information, legal transaction, customer transaction, physical environment security, transaction security, risk management, finance, professional experience, marketing, visual and audio records, philosophical belief, religion, sect and other beliefs, association membership, health information, criminal conviction and security measures, and biometric data are processed following the purpose of personal data processing.

IX. Activities and Objectives for Processing and Sharing Personal Data

Personal data shall be processed for the purposes listed above and limited to the activities of the Conducting Emergency Management Processes, Conducting Information Security Processes, Execution of Employee Satisfaction and Loyalty Processes, Fulfilment of the Obligations of Employees arising from Employment Contract and Legislation, Execution of Benefits Processes for Employees, Conducting Audit / Ethical Activities, Conducting Training Activities, Execution of Access Rights, Conducting Activities in Accordance with the Legislation, Execution of Finance and Accounting, Ensuring Physical Security, Execution of Assignment Processes, Monitoring and Execution of Legal Affairs, Execution of Internal Audit / Investigation / Intelligence Activities, Conducting Communication Activities, Planning Human Resources Processes, Execution / Audit of Business Activities, Conducting Occupational Health / Work Safety Activities Taking and Evaluating Suggestions for Improvement of Business Processes, Conducting Business Continuity Activities, Conducting Logistics Activities, Execution of the Procurement Process of Goods / Services, Execution of After Sales Support Services, Execution of Sales of Goods / Services, Execution of Production and Operation Processes of Goods / Services, Execution of Customer Relationship Management Processes Organization and Event Management, Conducting Performance Evaluation Processes, Conducting Advertising / Campaign / Promotion Processes, Execution of Risk Management Processes, Custody

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and Archive Activities Social Responsibility and Civil Society Activities, Conduct of Contract Processes, Conducting Strategic Planning Activities, Tracking of Requests / Complaints, Ensuring Security of Movable Goods and Resources, Execution of Remuneration Policy, Ensuring the Security of Data Controller's Operations, Conducting Marketing Processes of Products / Services, Foreign Personnel Work And Residence Permit Procedures Informing Authorized Persons, Institutions and Organizations, Execution of Management Activities.

Personal data is transferred to our business partners and suppliers, legally competent public institutions, organizations and persons following the basic principles stipulated by the Law and within the scope of the personal data processing conditions and purposes specified in Articles 8 and 9 of the Law and for the purposes set out above.

X. Measures Taken when Transferring Data to Third Party Service Providers

Articles for the protection of personal data are added to contracts and annexes made with third-party service providers, additional commitment or protocols are issued.

XI. Exceptions

Persons who detect different practices other than those describe in this policy shall receive support from the Data Controllers' Contact Person and Data Officials in writing.

XII. Principles of Personal Data Processing

In order to ensure compliance with the Law, personal data are processed in accordance with the general principles and provisions stipulated in the legislation. In this context, the Data Controller acts in accordance with the principles listed below in the processing of personal data in accordance with the legislation related to the Law.

1. *Lawfulness and fairness*

The Data Controller acts in accordance with the Law and the rules of integrity within the scope of personal data processing activities.

2. *Being accurate and kept up to date where necessary.*

The Data Controller shall establish the necessary systems to ensure that the personal data processed by considering the fundamental rights of personal data owners and their legitimate interests are accurate and up-to-date and to take necessary measures accordingly.

3. *Being processed for specified, explicit and legitimate purposes.*

The Data Controller determines for what purpose personal data will be processed and submits these purposes to the data subjects' information before personal data is processed. Personal data shall not be processed except for the legitimate and lawful purposes specified.

4. *Being relevant, limited and proportionate to the purposes for which they are processed.*

Data Controller; handles personal data in a manner that is conducive to achieving the specified purposes and avoids the processing of personal data that is not relevant or needed in achieving the purpose. In this context, it considers proportionality requirements and does not use personal data other than for the purpose of processing.

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5. Being stored for the period laid down by relevant legislation or the period required for the purpose for which the personal data are processed.

The Data Controller primarily determines whether a period is foreseen for the storage of personal data in the relevant legislation. If a storage period is determined, it acts in accordance with this period. If a period has not been determined, it retains personal data for the time required for the purpose in which they are processed.

6. Processing of Customer and Business Partners Data

Personal data may be processed to communicate with the customers in writing and verbally for the purposes stated above.

Due to the relationship arising from the contract, personal data of current and potential customers and business partners (in case the business partner is a legal person, the business partner's officer) can be processed for the establishment, implementation, and termination of a contract without approval. Personal data prior to the contract, during the contract-starting phase; to prepare an offer, prepare a purchase form, or meet the data subject's demands for the implementation of the contract.

For advertising purposes, personal data is processed for advertising or market and public opinion research only if the purpose of collecting this information is suitable for those purposes. Data subject is informed that the information will be used for advertising purposes.

Personal data can be processed without explicit consent to clearly state the data processing in the relevant legislation or to fulfil a legal obligation determined by the legislation, if it is clearly required by our legal obligations or Law. The type and scope of data transactions must be required for legally permitted data processing activity and must comply with applicable legal provisions.

Special categories of personal data is processed provided that adequate measures are taken to be determined by the Authority and within the framework of the provisions of the Law.

Data subject's special categories of data, other than his health and sexual life, are processed with his explicit consent. If the person does not have explicit consent, it is processed within the exceptions stipulated in the Law.

7. Processing of Employee and Candidates' Data

The rules and procedures that regulate the terms and methods of personal data protection and processing of individuals working within the Data Controller are included in the "Protection and Processing of Employee Personal Data Policy".

However, it is mandatory to collect and process the personal data of the employees until the establishment, implementation, and termination of the employment contract. The explicit consent of the employees may not be obtained for these. Personal data of potential employee candidates are also processed in job applications. In case of rejection of the candidate's job application, the personal data obtained at the time of application are kept for as long as the retention period, at the end of this period, they are erased, destructed or anonymized.

Personal data of the employee may be processed without further approval for the purpose of clearly specifying the processing in the relevant legislation or fulfilling a legal obligation determined by the legislation.

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Personal data of the employees can be processed without further approval in cases where there is a legitimate interest of the data controller. If the data of the employees are processed based on the legitimate interest of the data controller, it is examined whether this processing is moderate or not and it is checked that the legitimate interest does not violate a right of the employee to be protected.

Special categories of personal data is only processed under certain conditions. Data related to race and ethnicity, political opinion, religion, philosophical belief, sect or other beliefs, disguise and clothing, membership to associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, and biometric and genetic data are defined as special categories of personal data. Special categories of personal data may only be processed with the explicit consent of the employee and by taking the necessary administrative and technical measures.

The situations listed below are exceptions to this provision, and even if the employee does not have explicit consent, the personal data may be processed. Special categories of personal data other than the health and sexual life of the employee can only be processed by the authorized institutions and organizations and the persons under the obligation of keeping secret for the purpose of protecting public health, executing protective medicine, medical diagnosis, treatment and care services, planning and managing the financing and health services when stipulated by law.

XIII. Terms of Processing Personal Data

1. Identification and Processing of Personal Data

According to the law, personal data is defined as “any information related to an identified or identifiable natural person”. The concept of personal data is not only information that enables the recognition and identification of persons such as name, surname, place of birth, date of birth, but also covers all physical, social, cultural, economic, and psychological information of the persons.

In addition to the identity information of the person, all information that ensures that the person is specific or identifiable such as citizenship number, tax number, passport number, social security number, driver's license number, motor vehicle license plate, home address, business address, e-mail address, telephone number, fax number, CV, photo, video, genetic information, blood type, criminal history, and criminal record information are personal data and are covered by the protection of personal data.

In accordance with this definition, the Data Controller determines whether all data collected by the Data Controller, including its business partners, employees, and customers are included in the scope of personal data and processes the same in accordance with the rules defined in the Law.

Processing of personal data; if obtained by fully or partially automated means or by being part of any data recording system and by non-automated means, covers all kinds of operations performed on data such as saving, storing, preserving, modifying, rearranging, disclosing, transferring, making available, classifying, or preventing its use.

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2. *Exceptions*

The Data Controller processes personal data with the explicit consent of the data subjects in accordance with the Law. However, it is possible to process personal data without seeking explicit consent if any of the following conditions exist.

- 2.1. Clearly prescribed by law (tax legislation, labour legislation, trade legislation, etc.).
- 2.2. Where it is necessary to process personal data of contract parties,
Processing of personal data pertaining to the parties of the contract is required, provided that it is directly related to the establishment or performance of a contract (Labor contract, sales contract, transportation contract etc.).
- 2.3. It is mandatory to protect the life or body integrity of the persons or another person for whom legal validity has not been recognized for its consent and being in a position of not capable of explaining its consent due to the actual impossibility.
- 2.4. In cases where data controller is required to fulfil its legal obligation (financial audits, security legislation, compliance with sector-oriented regulations, etc.)
- 2.5. Making the personal data public by the data subject (providing the information of the persons concerned to the public).
- 2.6. Data processing is mandatory for the establishment, use or protection of a right (mandatory data to be used in works such as litigation, registration procedures, all kinds of land registry transactions, etc.)
- 2.7. It is mandatory to process data for the legitimate interests of the data controller, if it does not harm the fundamental rights and freedoms of the data subject.

3. *Processing Special Categories of Personal Data*

Some personal data within the scope of the law are called “Special Categories of Personal Data”. The Data Controller cannot process such data without the explicit consent of data subject. Explicit Consent is “a consent on a particular subject, based on the information and expressed in free will”.

The Law has considered biometric and genetic data of a person concerning his/her race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, appearance and clothing, membership to an association, foundation or trade union, health, sexual life, criminal conviction, and security measures as special categories of personal data. These data are limited in number as defined in the Law and cannot be increased through interpretation.

The Data Controller shall also take adequate measures determined by Personal Data Protection Board (Board) in the processing of sensitive personal data.

Data Controller, in accordance with the Law, can only process special categories of personal data as follows.

- 3.1. With the explicit consent of the data subject.
- 3.2. With the provision of the Law (personal data other than health and sexual life can be processed without seeking the explicit consent of the data subject in cases stipulated by the laws).
- 3.3. Planning, management, and financing of health services for public health reasons (Public health protection, preventive medicine, medical diagnosis, treatment and care services, and planning, management and financing of health services, by persons

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under the obligation to keep secrets or processed by authorized institutions and organizations).

4. Transfer of Personal Data

The Data Controller, by taking necessary security precautions for the purposes of personal data processing in accordance with the articles 5/2 and 6/3 of the Law, can transfer personal data to third parties as long as it meets the requirements (legal reasons) specified in the Law. At the same time, the Data Controller may transfer personal data to third parties without explicit consent in accordance with the data processing requirements outlined in the Law.

The Data Controller takes the necessary administrative and technical measures to transfer the data he processes without explicit consent, in accordance with the restrictions in the Law.

The data controller may transfer the personal data to foreign countries declared to have sufficient protection by the Board. However, for countries where adequate protection is not available; Personal data can be transferred to foreign countries if the conditions are met according to Law.

XIV. Data Controller Obligations

1. Obligation to Inform Personal Data Owner

During the acquisition of personal data, the Data Controller shall clarify the following matters to personal data owners.

- 1.1. Identification of data controller or its representative if any
- 1.2. For what purpose the personal data will be processed
- 1.3. To whom and what purpose the personal data shall be transferred
- 1.4. Method and legal reasons for personal data collection
- 1.5. Rights of the personal data owner under to Article 11 of the Law

In accordance with this obligation, the Data Controller informs the persons concerned with the text for the obligation to inform. Obligation to inform is conducted as soon as the first contact is made with the concerned person.

If the personal data is not obtained from the concerned person, the obligation to inform must be made within a reasonable time.

2. Obligation to Conclude Applications of Personal Data Owners

Personal data owners may request information in writing in accordance with the Law by applying to the Data Controller or by other methods to be determined by the Board.

The Data Officer responds to applications in accordance with Article 13 of the Law in order to evaluate the rights of personal data owners and to inform them personally. The data controller creates and implements procedures for other administrative and technical regulations.

The rights of personal data owners are as follows.

- 1.1. Being aware of whether their personal data are processed.
- 1.2. Request information about personal data if processed.

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- 1.3. Being aware of the purpose of the processing of personal data and whether they are used in accordance with their purpose.
- 1.4. Being aware of the third parties to whom personal data are transferred in Turkey or abroad
- 1.5. Requesting correction of personal data in case of incomplete or incorrect processing
- 1.6. Requesting the erasure or destruction of your personal data within the framework of the conditions stipulated in the relevant legislation.
- 1.7. Requesting notification of the transactions made on the personal data made in accordance with the relevant legislation to third parties to whom their personal data are transferred.
- 1.8. Objecting to a result against the contact as a result of exclusive analysis of the processed data through automated systems
- 1.9. If the personal data is damaged due to the processing of their personal data in violation of the Law, requesting the removal of the damage.

The Data Officer processes applications submitted using the Application Form. If the Board determines other application methods, the application shall be accepted with these methods.

The Data Controller responds to the request as soon as possible and within 30 (thirty) days at the latest, depending on the nature. The Data Controller may accept the applications and take the necessary actions or reject the applications with their reasons.

The personal data owner may file a complaint to the Board within 30 (thirty) days and in any case within 60 (sixty) days of the date of receipt of the answer in case the application is rejected, the answer given is insufficient or the answer is not answered.

The Data Controller shall respond to the personal data owners in time and in reasoned manner as required by the Law.

3. Obligation to Ensure Security of Personal Data

The Data Controller takes the necessary technical and administrative measures to ensure the appropriate level of security to prevent the illegal processing of the personal data they process and to prevent the illegal access to the data and to protect the data.

The Board will be able to make detailed arrangements about the obligations related to data security in the future. Therefore, the Data Controller shall exercise due diligence and ensure the security of personal data to comply with the obligations within this scope.

If the processed personal data is obtained by others in illegal ways, the Data Controller notifies violation to the Board within latest 72 hours (Seventy-Two) from the violation detection date. Following the determination of the persons affected by the data breach in question, the data subjects are also notified within the shortest possible time. If the contact address of the data subject can be reached directly, if it is not available, publishing the data controller through its website, etc. notification is made with appropriate methods.

4. Taking Technical and Administrative Measures for Providing Legal Data Processing

All processes related to the personal data processing activities performed by the business units within the Data Controller are collected and analysed in the personal data processing

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inventory. All activities conducted by the business units, from collection to deletion of data, are audited of compliance with the law.

Personal data processing activities are supervised by established technical systems. When a breach of law is detected, it is reported to the data subject and the deficiency or unlawfulness is eliminated.

The Data Controller informs and trains its employees on the Law and the processing of personal data in accordance with the Law.

Contracts and documents governing the legal relationship between the Data Controller and the Data Controller's business partners, employees and customers shall be accompanied by provisions imposing the obligation not to process, disclose or use personal data contrary to the regulations in the Law.

The procedures for ensuring the compliance of the activities of each business unit with the personal data processing requirements specified in the Law are determined for each business unit and the activity it executes. Implementation rules specific to business units are determined, necessary administrative measures are taken to ensure the supervision of these rules and continuity of implementation and training are provided by establishing a procedure.

5. Taking Technical and Administrative Measures to Prevent Illegal Access to Personal Data

The Data Controller shall take the necessary administrative and technical measures to prevent illegal obtaining, disclosure, display, and transfer of personal data to third parties according to the nature of the data to be protected.

Technical measures are taken in accordance with technological developments and the measures taken are updated and renewed when necessary.

Technological solutions are produced for issues with security risk.

The measures to be taken by the Data Controller are not limited to this article.

6. Erasure, Destruction, and Anonymization of Personal Data

In the event that the reasons requiring processing are eliminated despite being processed in accordance with the relevant legal provisions as regulated in Article 138 of the Turkish Criminal Code and Article 7 of the Law, the Data Controller erases, disposes of or anonymizes the personal data upon its own decision or upon the request of the personal data owner.

The Data Controller shall take the technical and administrative measures; develops the necessary functioning mechanisms; trains, assigns and raises awareness of relevant business units to comply with their obligations contained herein.