

PRIVACY POLICY

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1 AIM AND SCOPE

As 3 ARTI BİLGİ TEKNOLOJİLERİ MÜHENDİSLİK YÖNETİM EĞİTİM DAN. SAN. VE TİC. LTD. ŞTİ. ("3 ARTI LTD. ŞTİ."), since the entry into force of the Turkish Personal Data Protection Law No. 6698 ("PDPL" or the "Law"), we attach great importance to the protection of personal data belonging to all natural persons with whom we come into contact in any manner while carrying out our commercial activities, and to the full compliance with the requirements set forth under the PDPL within this framework.

This document, prepared with reference to the Personal Data Protection and Processing Policy, has been drafted to inform you about the processes and principles regarding the collection, use, sharing, and storage of personal data by 3 ARTI LTD. ŞTİ. Within this Policy, the principles governing the processing of personal data belonging to data subjects by 3 ARTI LTD. ŞTİ. are set out in accordance with the order of the regulations under the PDPL. These explanations cover 3 ARTI LTD. ŞTİ. employees, our current and potential customers, visitors, and other natural persons who are in a relationship with 3 ARTI LTD. ŞTİ.

This Policy is applied across all processes of 3 ARTI LTD. ŞTİ.

2 GOAL

With Privacy Policy, 3 ARTI LTD. STI. aims to create the necessary systems in line with the aim of raising awareness about the processing and protection of personal data in accordance with the law and to establish the necessary order to ensure compliance with the legislation within the body of 3 ARTI LTD. STI. The Privacy Policy of 3 ARTI LTD. STI. aims to guide the implementation of the PDP Law and arrangements set forth with the relevant legislation.

3 DEFINITIONS AND ABBREVIATIONS

Definitions / Abbreviations	
Explicit Consent	Consent related to a particular subject, which is based on information and explained by free will.
Relevant User	Persons, who process personal data within the organization of the data officer or in accordance with the authority and instructions received from the data officer, except for the person or unit responsible for the technical storage, protection and backup of the data.
Destruction	Personal data deletion, destruction or anonymization.
Law/PDPL	Law/PDPL Law on the Protection of Personal Data No.6698

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Recording Media	Any environment, in which personal data is processed by non-automatic means, whether fully or partially automated or as part of any data recording system.
Personal Data	All kinds of information about identified or identifiable real person.
Processing of Personal Data	All kinds of operations performed on the data such as acquiring, recording, storage, preservation, alteration, rearrangement, disclosure, transfer, acquisition, rendering available, classification or prevention of use of personal data by non-automatic means, whether fully or partially automated or as part of any data recording system.
Anonymization of Personal Data	Making personal data not to be associated with an identified or identifiable real person under any circumstances, even by matching it with other data.
3 ARTI LTD. STI. Personal Data Storage and Destruction Policy	"3 ARTI LTD. STI. Personal Data Storage and Destruction Policy", which is the basis for the process of determining the maximum duration required for the purpose, for which the personal data is processed by 3 ARTI LTD. STI., and the process of deleting, destroying and anonymizing the data.
Periodic Destruction	In the event that all requirements of processing of personal data contained in the law are eliminated, the process of deleting, destroying or anonymizing the personal data to be performed at the intervals specified in the storage and destruction policy.
Data Owner / Contact Person	A real person, whose personal data is processed.
Data Processor	A real or legal person, who processes personal data on behalf of data officer based on the authority granted by him/her.
Data Officer	A person, who determines the purposes and means of processing personal data and manages the environment where data is systematically stored.
Regulation	Regulation on the Deletion, Destruction or Anonymization of Personal Data published in the Official Gazette on October 28, 2017.
PDP Compliance Program	Program put into use by 3 ARTI LTD. STI. to ensure compliance with legislation on the protection of personal data.
Sensitive Personal Data	Data on race or ethnic origin, political opinion, philosophical belief, religion, sect, or other beliefs, appearance, association, foundation or trade union membership, health,

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	sexual life, criminal convictions and security measures and biometric and genetic data.

4 RELATED DOCUMENTS

Law on the Protection of Personal Data No.6698
Regulation on the Processing and Privacy of Personal Health Data published in the Official Gazette dated October 20, 2016 and numbered 29863.
Communiqué on Procedures and Principles to Be Followed in the Fulfillment of the Clarification Obligation published in the Official Gazette dated March 10, 2018 and numbered 30356
Communiqué on Procedures and Principles of Application to the Data Officer published in the Official Gazette dated March 10, 2018 and numbered 30356.

5 ROLES AND RESPONSIBILITIES

3 ARTI LTD. ŞTİ. acts as a data controller in its internal processes (HR, procurement, finance, contract management, and corporate operations), and acts as a data processor in projects where it provides IT/application/remote support services to customers.

ROLE	RESPONSIBILITY
PDP Committee, Legal Department, All Units	Although relevant units are responsible for implementing the 3 ARTI LTD. STI. Privacy Policy in all operations, activities and processes of 3 ARTI LTD. STI.; the activities will be carried out in the guidance provided by the Legal Department for the implementation of regulations, procedures, guidelines, standards and training activities prepared in accordance with Privacy Policy. Throughout 3 ARTI LTD. STI., all our employees, partners, guests, visitors and related third parties are entitled to cooperate with the Legal Department in preventing legal risks and imminent danger in addition to compliance with the Privacy Policy. All organs and units of 3 ARTI LTD. STI. Responsible for overseeing compliance with the Privacy Policy.

6 IMPLEMENTATION

6.1 GROUPS OF PERSONS MANAGED BY 3 ARTI LTD. STI. PRIVACY POLICY

Data owners, whose personal data is within the scope of 3 ARTI LTD. STI. Privacy Policy and processed by 3 ARTI LTD. STI. are grouped below:

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6.1.1 3 ARTI LTD. STI. Employees

3 ARTI LTD. STI. employees with service contracts with 3 ARTI LTD. STI.

6.1.2 3 ARTI LTD. STI. Candidate Employees

Persons, who have not concluded service contract with 3 ARTI LTD. STI. but have been evaluated by 3 ARTI LTD. STI. for this purpose.

6.1.3 3 ARTI LTD. STI. Business Partners Officials, Employees

Real person officials, shareholders, employees of the organizations, with which 3 ARTI LTD. STI. has a commercial relation.

6.1.4 3 ARTI LTD. STI. Visitors

Real persons, who visit the buildings owned or websites operated by 3 ARTI LTD. STI.

6.1.5 Other Real Persons

All other real persons not covered by Privacy Policy of 3 ARTI LTD. STI.

6.2 PROCEDURES AND PRINCIPLES FOR THE PROTECTION OF PERSONAL DATA

6.2.1 General Principles of Processing

3 ARTI LTD. STI. processes personal data in accordance with the procedures and principles provided for in PDPL and other relevant laws. In this context, full compliance with the following principles is ensured when personal data is processed by 3 ARTI LTD. STI.:

- **Compliance with the law and the good faith:**

In accordance with this principle, 3 ARTI LTD. STI. data processing processes are carried out within the limits required by all relevant legislation and good faith, especially the Constitution and PDPL.

- **Accurateness and up-to-dateness when required:**

Necessary measures are taken to ensure that the personal data processed by 3 ARTI LTD. STI. is accurate and up-to-date, and data owners are provided with the necessary opportunities by providing information to ensure that the data being processed reflects the actual situation.

- **Processing for specific, explicit and legitimate purposes:**

3 ARTI LTD. STI. only processes personal data for clearly and definitively determined legitimate purposes and is not engaged in data processing activities other than for

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these purposes. In this context, 3 ARTI LTD. STI. processes personal data only in connection with and if necessary, in relation to the business relationship established with the data owners.

- **Being relevant, limited and restrained to the purpose, for which they are processed:**

Data is processed by 3 ARTI LTD. STI. in accordance with PDPL and other relevant legislation, which is conducive to the realization of the objectives determined according to the data categories, related to and restricted to the realization of the purpose, and the processing of personal data that is not needed is avoided.

- **Preservation for the period stipulated in the relevant legislation or required for the purpose, for which they are processed**:

Personal data processed by 3 ARTI LTD. STI. is preserved only for the period stipulated in the relevant legislation or required for the purpose, for which it is processed. In this context, if there is a period stipulated in the relevant legislation for the storage of data, 3 ARTI LTD. STI. complies with this period; if there is no such period, it preserves the data only for the period required for the purpose, for which it is processed. 3 ARTI LTD. STI. does not store any data based on the possibility of future use.

6.2.2 Requirements for Processing Personal Data

Personal data processing conditions are regulated by the PDPL and personal data is processed by 3 ARTI LTD. STI. in accordance with the conditions set out below. Other than the exceptions listed in the law, 3 ARTI LTD. STI. only processes personal data by obtaining the explicit consent of the data owners. In this context, the personal data processing activities carried out are carried out in the presence of the personal data processing requirements listed below:

6.2.2.1 Explicit Consent of the Personal Data Owner

If the data owner gives consent to the processing of data about him/her freely, having sufficient knowledge of the subject, in a clear manner that will leave no room for hesitation and only limited to the transaction in question, personal data processing activity is carried out by 3 ARTI LTD. STI.

6.2.2.2 Personal Data Processing Activity is Clearly Stipulated in the Law

If there is a clear regulation in the laws related to personal data processing activities, personal data processing activities may be carried out by 3 ARTI LTD. STI. as limited to the relevant legal regulation.

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6.2.2.3 Failure to Obtain Explicit Consent of the Data Owner Due to Actual Impossibility and Personal Data Processing is Mandatory

If the personal data owner cannot disclose their consent or their consent is not valid and processing of personal data is mandatory to protect the life or body integrity of the persons, data processing activities are carried out by 3 ARTI LTD. STI. in this context.

6.2.2.4 The Personal Data Processing Activity is Directly Related to the Establishment or Execution of a Contract

If it is necessary to process personal data belonging to the parties to the contract in cases directly related to the establishment or execution of a contract, data processing activity is carried out by 3 ARTI LTD. STI.

6.2.2.5 Personal Data Processing Activities Must Be Carried out to Fulfill the Legal Obligation of 3 ARTI LTD. STI.

If 3 ARTI LTD. STI., which has adopted showing the necessary sensitivity to compliance with the law as a company policy, is legally obliged, personal data processing activity is carried out to fulfill the legal obligation.

6.2.2.6 Disclosure of the Data Owner's Personal Data

Personal data made public (publicly disclosed in any way) by the person concerned is processed by 3 ARTI LTD. STI. in accordance with the purpose of making public.

6.2.2.7 Data Processing is Mandatory for the Establishment, Exercise or Protection of a Right

If the processing of personal data is mandatory for the establishment, exercise or protection of a right, personal data processing activity is carried out by 3 ARTI LTD. STI. in parallel to this obligation.

6.2.2.8 Conducting Personal Data Processing Activity is Mandatory for the Legitimate Interests of 3 ARTI LTD. STI. Provided That Fundamental Rights and Freedoms of the Data Owner Are Protected

If personal data processing is mandatory for the legitimate interests of 3 ARTI LTD. STI., data processing activity may be carried out if the fundamental rights and freedoms of the data owner are protected. In this context, to determine the existence of this requirement, 3 ARTI LTD. STI. carries out "balance test" application accepted in the referred regulation.

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6.2.3 Compliance with Sensitive Data Processing Requirements

3 ARTI LTD. ŞTİ. places particular importance on the processing of special categories of personal data, which carry a risk of discrimination if processed unlawfully. In this context, when processing special categories of personal data, 3 ARTI LTD. ŞTİ. first carefully determines whether the conditions for data processing are met, and the processing activity is carried out only after ensuring that the legal basis for processing exists.

Processing activities carried out in the capacity of a data processor within the scope of IT services provided to customers acting as data controllers (including special categories of personal data) are outside the scope of this section; in such cases, the purposes and means of processing personal data are not determined by 3 ARTI LTD. ŞTİ. Processing activities are performed solely within the framework of the customer's written instructions and contractual security/confidentiality provisions, and the data are not used for 3 ARTI LTD. ŞTİ.'s own purposes.

Special categories of personal data processed by 3 ARTI LTD. ŞTİ. in the capacity of a data controller may be processed, provided that adequate measures determined by the Personal Data Protection Board are taken, in the following circumstances:

6.2.3.1 Processing of Personal Health Data

Personal health data may be processed by 3 ARTI LTD. STI. in case of one of the conditions listed below:

- By the persons or authorized institutions and organizations under the obligation of keeping secret for the purposes of public health protection, preventive medicine, medical diagnosis, treatment and care service provision and financing planning and management; or
- Explicit consent of the personal data owner.

6.2.3.2 Processing of Sensitive Personal Data Other Than Health and Sexual Life

Sensitive personal data other than health and sexual life (race or ethnic origin, political opinion, philosophical belief, religion, sect, or other beliefs, appearance, association, foundation or trade union membership, health, sexual life, criminal convictions and security measures and biometric and genetic data) are processed by 3 ARTI LTD. STI. with the express consent of the data owner or in cases prescribed in the law.

6.2.4 Purposes of Processing Personal Data

Your personal data obtained by 3 ARTI LTD. STI. may be processed within the scope described below.

- HR operations,

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- In-house operations,
- Activities with legal, technical and administrative consequences,
- Strategy, planning and business partners/supplier management,
- Planning and execution of corporate communication activities, events
- Planning and execution of in-house training programs/activities,
- Planning and execution of non-company training activities,
- Managing relationships with business partners and suppliers,
- Execution of employee recruitment processes ,
- Planning and execution of trainee and student provision, placement and operation processes,
- Planning human resources processes,
- Fulfillment of obligations arising from the contract of employment and legislation for employees of the company,
- Monitoring and supervision of employee business activities,
- Planning and execution of vested benefits and interests for employees,
- Planning and execution of employee exit operations,
- Planning and monitoring of employee performance evaluation processes,
- Managing relationships with business partners and suppliers,
- Remuneration management,
- Planning and execution of in-house orientation activities,
- Follow-up of finance and accounting affairs,
- Conducting investor relations,
- Planning and execution of efficiency/efficacy and availability analyses of business activities,
- Event management,
- Developing and managing information technology infrastructure,
- Planning, supervision and execution of information security processes,
- Planning and execution of business continuity activities,
- Planning and execution of information access authorizations of business partners and suppliers,
- Support in planning human resources strategies,
- Demand and complaint management,
- Use of data in operations for technical support maintenance or R&D product development or quality control and improvement activities.

The above-mentioned categories are for informational purposes, other categories may be added by us in order for 3 ARTI LTD. STI. to carry out future commercial and business activities.

6.3 PERSONAL DATA STORAGE

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Personal data we obtain is stored safely in physical or electronic environment for the appropriate period of time in order for 3 ARTI LTD. STI. to carry out commercial activities. Within the scope of these activities, 3 ARTI LTD. STI. acts in accordance with the obligations in all relevant legislation, especially PDPL, on personal data protection. In accordance with the relevant legislation, in case of termination of the purposes of processing personal data, provided that the storage of personal data for a longer period of time is approved or required, the data will be deleted, destroyed or anonymized by 3 ARTI LTD. STI. at the request of the data owners. If personal data is deleted through these methods, this data will be destroyed in such a way that it cannot be used and retrieved again in any way. 3 ARTI LTD. STI. Data Storage, Destruction and Anonymisation Policy is taken as reference.

6.4 TRANSFER OF PERSONAL DATA TO THE PERSONS WITHIN THE COUNTRY

As regards to sharing of personal data with third parties, 3 ARTI LTD. STI. carefully complies with the requirements set out in PDPL, without prejudice to the provisions contained in other laws. Within this framework, personal data is not transferred to third parties by 3 ARTI LTD. STI. without the explicit consent of the data owner. However, in the presence of one of the following requirements regulated by PDPL, personal data can also be transmitted without obtaining the explicit consent of the data owner:

- Explicitly prescribed in laws,
- Mandatory for the protection of the life or body integrity of a person, who is unable to disclose his/her consent due to actual impossibility or whose consent is not granted legal validity,
- Processing of personal data belonging to the parties to the contract is necessary, provided that it is directly related to the establishment or execution of the contract,
- Mandatory for the data officer to fulfill his/her legal obligation,
- Publicized by the data owner himself/herself,
- Data processing is mandatory for the establishment, exercise or protection of a right,
- Data processing is mandatory for the legitimate interests of the data officer, provided that the fundamental rights and freedoms of the data owner are protected.

6.5 TRANSFER OF PERSONAL DATA ABROAD

Where personal data are transferred abroad, countries providing an adequate level of protection are preferred. If there is no adequacy decision, the transfer is carried out by ensuring appropriate safeguards (e.g., standard contractual clauses, binding corporate rules, undertakings/commitment letters, certifications); the required

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notifications are completed and the processing is duly recorded. In exceptional cases where such safeguards cannot be ensured, personal data may be transferred abroad based on the explicit consent of the data subject or other exceptions предусмотред under the Law. Additional technical and administrative measures are applied for special categories of personal data. For each transfer, the recipient country, the recipient's role (data controller/data processor), the purpose of the transfer, and the security measures applied are documented.

Limited to cases where it is necessary for the conduct of the Company's activities, personal data may be processed by the relevant service providers through applications such as video conferencing software, email applications, meeting scheduling tools, communication and messaging applications, network applications used to carry out business operations, and sharing and social media platforms provided by overseas service providers.

6.6 RIGHTS OF THE DATA OWNER

As for personal data processed by 3 ARTI LTD. STI. in accordance with the principles set out in this Policy, necessary measures have been taken to exercise the rights recognized for data owners in Article 11 of the PDPL. These rights include:

a. Learn whether personal data is processed,
b. Request information if personal data has been processed,
c. Learn the purpose of processing personal data and whether it is used for the intended purpose,
d. Knowledge of third parties, to whom personal data is transferred at home or abroad,
e. Request correction if personal data is incomplete or incorrectly processed,
f. Request the deletion or destruction of personal data in accordance with the conditions provided for in Article 7 of the law,
g. Request that transactions performed in accordance with sub-paragraphs (e) and (f) above be notified to third parties, to whom personal data is transferred,
h. Object to the raise of a consequence, which is against the person himself/herself, by means of analysis of processed data exclusively through automated systems,
i. Request compensation if damages arise due to wrongful processing of personal data.

On the other hand, as per the Article 28(1) of the PDPL, data owners shall not exercise the abovementioned rights listed in Article 11 of the PDPL in the following cases:

- Processing of personal data by real persons within the scope of activities related to him/her or his/her family members living in the same residence, provided

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that the personal data is not given to third parties and the data security obligations are observed,

- Processing of personal data for purposes such as research, planning and statistics by anonymizing it with official statistics,
- Processing of personal data for the purposes of art, history, literature or science or within the scope of freedom of expression provided that national defense, national security, public safety, public order, economic security, privacy or personal rights are not violated or a crime is not constituted,
- 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 authorities or execution authorities in relation to investigations, prosecutions, trials or executions.

However as per the Article 28(2) of the PDPL, save as the right to claim damages, abovementioned rights listed in Article 11 of the PDPL shall not be applied in the following cases:

- Personal data processing is necessary for the prevention of crime or criminal investigation,
- Processing of personal data, which is publicized by the data owner himself/herself,
- Processing of personal data is required for the execution of the duties of supervision or regulation and disciplinary investigation or prosecution by the public institutions or organizations and public professional organizations based on the power granted by law,
- Personal data processing is necessary to protect the economic and financial interests of the State in relation to budget, tax and financial matters.

6.7 INFORMING PERSONAL DATA OWNERS

In accordance with Article 10 of the PDP Law and the Communiqué on the Procedures and Principles to Be Followed in the Fulfillment of the Obligation to Inform, 3 ARTI LTD. STI. carries out the necessary processes to ensure that data owners are informed during the acquisition of personal data. In this context, the clarification text to be provided by 3 ARTI LTD. STI. to the data owners shall include the following information listed below:

1. Title of our company,
2. Relevant persons whose personal data are processed,
3. Personal data that may be collected,
4. Purpose of processing of personal data of data owners by 3 ARTI LTD. STI.,

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5. To whom and for what purpose the processed personal data may be transferred,
6. Kişisel verilerin korunmasına ilişkin yöntemler,
7. Method and legal reason for collecting personal data,
8. Rights of the data owner;

6.8 FINALIZATION OF REQUESTS OF PERSONAL DATA OWNERS BY 3 ARTI LTD. STI.

If data owners submit their requests for their personal data to our company in writing or by other methods determined by the PDP Board, 3 ARTI LTD. STI., in its capacity as data officer, carries out the necessary processes to ensure that the request is finalized as soon as possible and no later than thirty (30) days, depending on the nature of the request, in accordance with the Article 13 of the PDP Law. Data owners shall make their personal data requests in accordance with the Communiqué on Procedures and Principles of Application to the Data Officer.

3 ARTI LTD. STI., as part of ensuring data security, may request information to determine whether the person, who is applying is the owner of the personal data subject to the application. Our company may also ask questions about its application to the personal data owner to ensure that the application of the personal data owner is finalized in accordance with the request.

In the event that the application of the data owner is likely to block the rights and freedoms of other people, requires disproportionate effort, the information is publicly available information; 3 ARTI LTD. STI. may reject the request by explaining the reason.

6.9 MEASURES TAKEN FOR DATA SECURITY

3 ARTI LTD. STI. takes all necessary technical and administrative measures to ensure the appropriate level of security required for the protection of personal data. Measures provided in Article 12(1) of the PDPL are as follows:

- Prevent unlawful processing of personal data,
- Prevent unlawful access to personal data,
- Ensure the preservation of personal data.

The measures taken by 3 ARTI LTD. ŞTİ. within this scope are listed below:

Administrative Measures

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- 3 ARTI LTD. STI. conducts the necessary audits and have these conducted to ensure the implementation of the provisions of the law in its own institution or organization.
- If the personal data processed is obtained by others by illegal means, 3 ARTI LTD. STI. shall notify the relevant person and the Board as soon as possible.
- As for the sharing of personal data, 3 ARTI LTD. STI. signs a framework agreement with the persons, with whom personal data is shared, or provides data security with the provisions to be added into the contracts.
- 3 ARTI LTD. STI. employs personnel knowledgeable and experienced about the processing of personal data.
- New personnel are also informed about ISMS and PDPL.
- Training and awareness-raising activities on data security are periodically carried out for employees
- Corporate policies on access, information security, use, storage and destruction are prepared and implemented.
- Confidentiality commitments are given.
- The authorizations of employees who change positions or leave their jobs are removed.
- Signed contracts contain data security provisions.
- Extra security measures are taken for personal data transferred via paper, and the relevant document is sent in confidential document format.
- Personal data security policies and procedures have been determined.
- Personal data security problems are reported quickly.
- Necessary security measures are taken when entering and exiting physical environments containing personal data.
- The disaster recovery plan is operated in conjunction with the protection, security, and anti-sabotage plans.
- The security of environments containing personal data is ensured.
- Personal data is minimised as much as possible.
- Existing risks and threats have been identified.

Technical Measures

- It performs the necessary internal controls within the framework of established systems.
- It carries out risk analysis, data classification, IT risk assessment and business impact analysis within the established systems.
- It ensures the provision of technical infrastructure and creation of relevant matrices that will prevent and/or monitor the leakage of personal data outside the institution.

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- It ensures that access of the employees working at the information technology units are under the control of the officers.
- Network security and application security are ensured.
- A closed-system network is used for the transfer of personal data over the network.
- Security measures are taken within the scope of the procurement, development, and maintenance of information technology systems.
- The Security of personal data stored in the cloud is ensured.
- An authorisation matrix has been created for employees.
- Access logs are kept regularly.
- Data masking measures are applied when necessary.
- Up-to-date antivirus systems are used.
- Firewalls are used.
- Personal data is backed up, and the security of backed-up personal data is also ensured.
- User account management and authorisation control system is implemented and monitored.
- Internal periodic and/or random audits are conducted and carried out.
- Log records are kept without the need for user intervention.
- Methods in accordance with current encryption and system management standards are used for personal data and all managed systems.
- Intrusion detection and prevention systems are used.
- A Penetration test is applied.
- Cyber security measures have been taken, and their implementation is constantly monitored.
- Encryption is performed.
- Data transfer on portable media devices is restricted, and technically necessary measures are taken in this regard.
- Data loss prevention software is used.

6.10 SECURITY OF PERSONAL DATA

3 ARTI LTD. ŞTİ. has established its system within the scope of TS ISO/IEC 27001 Information Security Management System and similar standards, securing it with the certificates obtained and maintaining it continuously.

3 ARTI LTD. ŞTİ. takes all necessary technical and administrative measures to ensure an appropriate level of security in order to prevent unlawful processing of personal data, unlawful access to personal data, and to ensure the preservation of personal data.

Within this scope, studies have first been conducted to identify the personal data processed by 3 ARTI LTD. ŞTİ. Considering whether the processed personal data include special categories of personal data, potential risks to the protection of these data have been identified, and necessary technical and administrative measures to mitigate or eliminate these risks have been implemented.

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Internal company policies and procedures have been adopted to regulate the processing, preservation, storage, destruction, and other related processes of personal data in compliance with the law, regulations, and relevant security measures.

Additionally, employees involved in personal data processing processes are required, as part of their job responsibilities, to sign confidentiality agreements and undertakings. Employees are reminded that if it is determined that they act contrary to security policies and procedures, the necessary disciplinary procedures will be applied.

Contracts between 3 ARTI LTD. ŞTİ. and employees, suppliers, business partners, and contracts with data processors have been reviewed. Within this scope, revisions have been made primarily in line with the KVKK and other relevant legislation, and additional protocols have been prepared.

Following the review of personal data held by 3 ARTI LTD. ŞTİ., the identified personal data have been analyzed and examined under the applicable legislation. In this context, unnecessary data have been deleted, and the principle of minimizing data has been adopted wherever possible.

Technical methods with an appropriate level of security are used to prevent unlawful access to personal data and to ensure that personal data are stored in secure environments, and these methods are updated in line with technological developments.

6.11 PERSONAL DATA COMMITTEE

The Personal Data Committee ("PDPL Committee") was established with the resolution of the Board of Directors of the Company to manage this policy within 3 ARTI LTD. STI. and to ensure the control and supervision of the fulfillment of Policy Requirements by the relevant units. This committee is made up of Deputy General Manager, Administrative and Financial Affairs Coordinator, Human Resources Manager, Information Technology Director, Quality and and Method Development Manager and Legal Department.

Duties of the PDPL Committee are listed below:

1. Follow the PDPL and related legislation, identify the issues that need to be addressed to ensure compliance with the legislation, monitor their implementation,
2. Prepare and enact basic policies related to the protection and processing of personal data, as well as changes when necessary, and submit them for approval to the senior management,

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3. Implement and supervise policies related to the protection and processing of personal data and make in-house assignments within this framework,
4. Raise awareness within the company about the protection and processing of personal data,
5. Identify risks that may arise in personal data processing activities and ensure that necessary measures are taken,
6. Ensure the organization of trainings,
7. Resolve and respond to applications of personal data owners,
8. Conduct relations with the Board and exchange correspondence,
9. Conduct operations on the Data Officers Registry,
10. Perform other duties of the Board of Directors regarding the protection of personal data.

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