

PROTECTION AND PROCESSING OF PERSONAL DATA POLICY

1. INTRODUCTION

1.1. Purpose

At Limak Yenilenebilir Enerji A.Ş. (“**Limak**” or “**Company**”), it is our priority to comply with applicable regulations including the Constitution of the Republic of Turkey and the Law No. 6698 on the Protection of Personal Data¹ (“**KVKK**” or “**Law**”) in the processing of personal data belonging to employees, employee candidates, interns, supplier employees, supplier officials, product or service recipients (customers), shareholders/partners, members of the board of directors, members of the press, public officials, third parties, business partners and visitors, and to ensure that the rights of the data subjects whose data are processed can be exercised effectively.

The basic principle of our policy regarding the processing of personal data is the protection of personal data and the observance of the fundamental rights and freedoms of natural persons whose personal data are collected. For this reason, in all our activities involving the processing of personal data, we attach utmost importance to the protection of the right to privacy, privacy of communication, freedom of thought and faith, and the right to effective remedies in law.

We take all administrative and technical protection measures required by the nature of the relevant data for the protection of personal data and in accordance with applicable regulations and current technology, and maintain up-to-date measures on this front.

Limak Personal Data Protection and Processing Policy (“**Policy**”) outlines the methods we apply for the processing (e.g. storage, transfer and deletion or anonymization) of personal data collected during our operations within the framework of the principles referred to in KVKK.

1.2. Scope

Limak applies this Policy for any personal data of employees, employee candidates, interns, supplier employees, supplier officials, product or service recipients (customers), shareholders/partners, board members, members of the press, public officials, third parties, business partners, and visitors subject to data processing activities.

Our policy is applied for all processing activities related to personal data at Limak, and has been elaborated and prepared taking into account the KVKK and other legislation on personal data, as well as the international standards in this field.

1.3. Definitions and Abbreviations

For the purposes of the present Policy, the term;

¹ <http://www.mevzuat.gov.tr/MevzuatMetin/1.5.6698.pdf>

- a. **Express consent** refers to clear consent given on a specific subject extended on the basis of information and free will, leaving no room for doubt, and restricted to that particular act only.
- b. **Anonymization** refers to the process whereby Personal data are rendered completely impossible to associate with a specific or identifiable natural person, even when combined with other data.
- c. **Employee** refers to individual Limak personnel.
- d. **Employee candidate** refers to the individuals who applied for a job at Limak.
- e. **Data subject** refers to the natural person whose personal data is processed.
- f. **Personal data** refers to any information concerning a specific or identifiable natural person.
- g. **Processing of personal data** refers to any kind of process applied on the data, including obtaining, saving, storing, retaining, revising, modifying, disclosing, transferring, receiving, making accessible, classifying, or preventing the use of personal data, through fully or partly automated systems or through non-automated systems provided that such constitute the parts of a specific data registration system.
- h. **PDP Board** refers to the Personal Data Protection Board.
- i. **PDP Agency** refers to the Personal Data Protection Agency.
- j. **KVKK** or the **Law** refers to the Personal Data Protection Law published in the Official Gazette no. 29677 dated 7 April, 2016.
- k. **Limak** or the **Company** refers to Limak Yenilenebilir Enerji A.Ş.
- l. **Sensitive Personal Data** refers to data on the race, ethnicity, political and philosophical views, religion, sect and other beliefs, attire, association, foundation or labor union membership, health, sex life, criminal records, and security measures, along with biometric and genetic data.
- m. **Policy** refers to Limak Yenilenebilir Enerji A.Ş. Policy for the Protection and Processing of Personal Data.
- n. **Data processor** refers to the legal or natural person processing personal data on behalf of the Data Controller, on the basis of the authorization granted by it.
- o. **Data controller** refers to the legal or natural persons which determine the purposes and means of processing personal data, and which are responsible with the establishment and management of the data entry system.

2. GOVERNANCE STRUCTURE

Our Company has designed the KVKK governance structure with the aim of fulfilling our KVKK obligations, implementing the Policy, and performing the functions described below.

- To prepare the fundamental policies on the Protection and Processing of Personal Data and to submit them to the senior management for approval,
- To revise the basic policies on the protection and processing of personal data due to changes in the Company's workflow or regulations, and to submit them to the senior management for approval for implementation,
- To decide how the implementation and supervision of the policies on the Protection and Processing of Personal Data will be carried out, and to submit the internal assignments and coordination within this framework for the approval of the senior management (e.g. appointing a contact person in each unit/department to maintain contact and coordination with the PDP Committee),
- To determine the issues that need to be addressed in order to ensure compliance with KVKK and applicable regulations, and to submit the necessary actions to the senior management for approval; to oversee and coordinate their implementation (e.g. providing disclosures and information required to be provided to the Employees and Employee Candidates under the present Policy),
- To raise awareness about the Protection and Processing of Personal Data within the Company and its business partners,
- To ensure that the necessary measures are taken by identifying the risks that may arise in the context of the Company's personal data processing activities; to submit suggestions for improvement, to the senior management for approval,
- To maintain communication with the PDP Committees / PDP officers in other Limak group companies and to ensure that the practices adopted at various Limak group companies for protecting personal data are mutually compatible,
- To design and conduct trainings on the protection of personal data and the implementation of the policies,
- To act as the top level decision-making authority regarding the data subjects' applications (e.g. developing the infrastructure and the work flow required for data subjects' applications),
- To manage the relations with the PDP Board and the PDP Authority (e.g. procuring VERBIS registration for the Company),

The design of the governance structure includes the establishment of a personal data protection committee (“**PDP Committee**”) within Limak Group. The members of the Committee are appointed by the senior management of the relevant group company and the internal directive on the distribution of duties and working procedures and principles of the Committee has been prepared and approved by the senior management. Furthermore, a relevant person responsible for the fulfillment of the functions above within the Company in liaison with the PDP Committee

has been assigned by the Company's senior management. In addition to the above-mentioned duties, the Committee or the responsible person(s) to be appointed in this regard are assigned other duties and responsibilities according to the needs of the Company and the nature of the activities they carry out.

The main units/directorates recommended for inclusion in the PDP Committee are: (i) Information Technologies; (ii) Legal; (iii) Internal Audit; (iv) Human Resources and Personnel Affairs. In addition to these, the units/departments that process significant amounts of personal data in their workflow (for example, the sales/marketing unit, customer services department, if any) are also prioritized in terms of participation in the PDP Committee. The PDP Committee determines the distribution of authorities and duties among its members internally and submits them to the approval of the Company's senior management.

3. LEGAL OBLIGATIONS

Our legal obligations regarding the protection and processing of personal data, given our position as a data controller, are listed below:

3.1. Disclosure obligation

When collecting personal data as a data controller, we are under obligation to inform the Data Subject about;

- The purposes for which the personal data will be processed,
- Information on our trade name,
- The potential recipients and purpose of transfer of processed personal data,
- Methods of and legal grounds for the collection of data,
- The Data Subject's rights arising from KVKK.

At Limak, we make sure that this Policy is understandable and accessible. We fulfill our disclosure obligation through our website, the employee portal or the boards at our premises or through printed or electronic information texts for the relevant groups.

3.2. Our obligation to ensure data security

We take the administrative and technical measures stipulated in the legislation to ensure the security of the personal data we process as the data controller. The obligations and measures taken regarding data security are explained in detail in section 11 of this Policy and in Limak Personal Data Retention and Disposal Policy.

4. CLASSIFICATION OF PERSONAL DATA

4.1. Personal Data

The protection of personal data concerns only natural persons, and does not cover information belonging to legal persons, and excluding any data pertaining to natural persons. Therefore, the present Policy does not apply to data belonging to legal persons.

This Policy applies to information directly referring to an individual, such as her name, surname, or Turkish ID Identity number, as well as to information indirectly referring to her such as the height, weight, or the educational status of the person concerned.

4.2. Sensitive Personal Data

The term sensitive personal data refers to the data on the race, ethnicity, political and philosophical views, religion, sect and other beliefs, appearance and attire, association, foundation or labor union membership, health, sex life, criminal records, and security measures, along with biometric and genetic data.

Sensitive personal data are also subject to the provisions of this Policy.

4.3. Categories regarding Personal Data

Within the scope of our commercial operations and for employment purposes, we process personal data related to the following categories of persons:

Employee	The term Employee refers to permanent employees of Limak. Detailed information about the processed personal data of employees is published on the boards accessible to employees only, and the employees are provided detailed information on this matter. (See Appendix-1)
Employee Candidate	The term refers to natural persons who have applied for a job at Limak through various channels, or whose resume details have been submitted to Limak through private employment agencies (Kariyer.net, Secretrcv.com, LinkedIn, etc.). You can access the Employee Candidate Disclosure Text on Limak's website. (See Appendix-1)
Members of the Press	The term refers to the natural persons Limak engages with in the press and media organizations as part of its press relations and its activities regarding public opinion. You can access the Members of the Press

	Disclosure Text on Limak's website. (See Appendix-1)
Shareholder/Partner	The term refers to the natural persons who hold shares of Limak. Detailed information about the processed personal data of shareholders/partners is published at Company Premises in a manner accessible to shareholders/partners only, and the shareholders/partners are provided detailed information on this matter. (See Appendix-1)
Public Officials	The term refers to the natural persons Limak engages with in government agencies as part of its judicial and administrative affairs and procedures. You can access the Public Officials Disclosure Text on Limak's website. (See Appendix-1)
Interns	The term refers to the interns employed by Limak in the context of mandatory or discretionary internships. The Disclosure Text for Interns is available on the boards. (See Appendix-1)
Supplier Employee	The term refers to the natural persons who are employees of the parties that provide goods or services to Limak based on the contracts concluded within the scope of its commercial operations. You can access the Supplier Employee Disclosure Text on Limak's website. (See Appendix-1)
Supplier Officers	The term refers to the natural persons who are the officers of the parties that provide goods or services to Limak based on the contracts concluded within the scope of its commercial operations. You can access the Supplier Officers Disclosure Text on Limak's website. (See Appendix-1)
Third Party	The term refers to the natural persons (such as the relevant company's employee and shareholders/partners) whose data regarding the company with which a merger or acquisition shall take place are processed as part of due diligence activities carried out by Limak prior to the merger and acquisition. You can access the 3rd Party Disclosure Text on Limak's website. (See Appendix-1)

Product or Service Recipient (Customer)	The term refers to the natural persons who are employees or officials of those who purchase products or services (customers) within the scope of the business activities carried out by Limak, and whose personal data are obtained directly. You can access the Customer Disclosure Text on Limak's website. (See Appendix-1)
Business Partners	The term refers to the natural persons or legal entities' officials and employees with whom Limak carries out its business activities. You can access the Business Partners Disclosure Text on Limak's website. (See Appendix-1)
Board Member	The term refers to the natural persons who are board members of Limak. Detailed information about the processed personal data of Board Members is published at Company Premises in a manner accessible to Board Members only, and the Board Members are provided detailed information on this matter. (See Appendix-1)
Visitors	The term refers to natural persons who access the physical spaces belonging to Limak for various purposes. You can access the Visitor Disclosure Text on Limak's website. (See Appendix-1)

5. PROCESSING OF PERSONAL DATA

5.1. General Principles

We process personal data in accordance with the following principles.

5.1.1. Processing in compliance with law and the rule of integrity

We process personal data in accordance with the rules of integrity and transparency, all the while fulfilling our disclosure obligations. While fulfilling the disclosure obligation, where possible, we briefly explain the purpose of processing at the time the data is obtained from you, and provide you with access to detailed information about the processing.

5.1.2. Ensuring that personal data is accurate and up-to-date when necessary

We take the necessary administrative and technical measures in our data processing procedures to ensure that the processed data is accurate and up-to-date. However, since a significant part of the data is processed on the basis of the statements provided by the Data Subjects, we reflect these statements in the most accurate way and we provide the Data Subjects with the option to request updates to their data and to correct errors, if any.

5.1.3. Processing for specific, explicit and legitimate purposes

At Limak, we process personal data within the scope of our legitimate purposes, the scope and content of which are clearly defined, and which serve the goal of carrying out our activities in accordance with applicable regulations and the ordinary course of life.

5.1.4. Being relevant with, and limited and proportionate to the purpose of processing

We process personal data in a limited and restrained manner associated with the specified purposes.

We refrain from processing personal data that is not relevant or not needed. For this reason, we do not process sensitive personal data unless there is a legal requirement to do so or unless we obtain express consent for such processing.

5.1.5. Retention of personal data for the periods stipulated in applicable regulations or as required by our legitimate interests

Various regulations require retention of personal data for a certain period of time. Therefore, we retain the personal data we process for the period stipulated in applicable regulations or as required for the purposes for which the personal data are processed.

We delete, destroy or anonymize personal data in the event that the retention period stipulated in the legislation expires or the purpose of processing ceases to exist.

5.2 Purposes of processing personal data

At Limak, our purposes for processing personal data are specified in detail in the Disclosure Texts prepared specifically for each category of data subject the data of which we process.

In the event that the processing activity carried out within the scope of the purposes listed in the said disclosure texts does not correspond to any of the grounds for compliance with the law as stipulated in Articles 5 and 6 of the KVKK, your express consent shall be obtained by Limak for such processing (See Appendix-2).

5.3 Methods personal data collection

Personal data is collected through online forms (e.g. website contact form), documents submitted by the data subject, employment contract and other print/electronic forms.

5.4 Legal grounds for collecting personal data

Personal data are collected by Limak and the natural or legal persons who process data on behalf of Limak, for the purposes specified above with reference to individual data categories, on the following grounds specified in Article 5 of the Law:

- Express consent of the data subject,
- Explicit provision of laws,
- Processing of personal data pertaining to the parties to the agreement being necessary, provided that it is directly related to the execution or performance of an agreement,
- Data processing being necessary for the performance of the data controller's legal obligations,
- Data processing being necessary for legitimate interests of the data controller, provided that the fundamental rights and freedoms of the relevant person are not harmed.

5.5 Legal grounds for collecting sensitive personal data

Personal data regarding health are processed by Limak on the legal grounds provided in KVKK article 6, which stipulates that such data "can be processed for the purposes of maintaining public health, preventive medicine, medical diagnosis, treatment and care services, financial planning and management of medical services, by people with confidentiality commitments or by the authorized agencies and organizations, without the express consent of the data subject." However, in cases where it is envisaged to process health information for a purpose other than those specified in Article 6 of the Law, express consent is obtained from the Data Subject (See Appendix-2).

Data relating to criminal convictions and security measures, biometric data and personal data related to trade union membership are processed for the purposes specified in the disclosure texts, based on the legal ground provided in Article 6 of the Law that "Sensitive personal data other than health and sex life may be processed without seeking the express consent of the Data Subject in cases stipulated by law". Still, except for the cases stipulated by law, sensitive personal data are processed with the express consent of the Data Subject in accordance with Article 6 of the Law (See Appendix-2).

5.6. Processing of personal data and sensitive personal data

5.6.1. Processing of personal data with express consent

Given the regulations, personal data cannot be processed without the express consent of the Data Subject. KVKK defines express consent as the "*statement of consent regarding a specific issue, based on information provided and free will to guide*". In case the processed data is sensitive personal data, the provisions of this Policy shall apply. Such information is provided through our disclosure texts.

5.6.2. Cases where express consent is not required for the processing of personal data

We may process personal data without express consent in the following cases:

- **Explicit provision of laws**

The personal data of the Data Subject may be processed in accordance with the law in cases where it is clearly stipulated in the laws (e.g., retaining the personal information of the employee as required by law).

- **Failure to obtain express consent of the data subject due to practical impossibility**

In case the processing of personal data is necessary for the protection of the life or physical integrity of the data subject himself/herself who is unable to give his/her consent due to actual impossibility or whose consent is not deemed legally valid, or of another person, personal data can be processed without express consent (e.g., the location of a kidnapped or lost person).

- **Processing being directly related to the execution or performance of the agreement**

In case the processing of personal data pertaining to the parties to the agreement is necessary, provided that it is directly related to the execution or performance of an agreement, such personal data may be processed without express consent (e.g., saving the customer company's address details so that the order can be delivered to the customer).

- **Processing being necessary for fulfilling a legal requirement**

Personal data that must be processed to fulfill a legal obligation may be processed without the express consent of the Data Subject (e.g., fulfillment of legal obligations such as retaining information, reporting, or disclosure stipulated by government agencies and authorities; sharing information in audits concerning specific areas such as banking, energy, and capital markets).

- **The data having been made public by the Data Subject herself**

Personal data made public by the Data Subject herself, in other words, personal data disclosed to the public in any way, may be processed without seeking express consent.

- **Data processing being necessary for the establishment, exercise, or protection of a right**

Personal data can be processed without seeking express consent in cases where data processing is necessary for the establishment, exercise, or protection of a right (e.g., required information pertaining to an employee who left the firm being retained pending the statute of limitations).

- **Data processing being necessary for legitimate interests**

Provided that it does not harm the fundamental rights and freedoms of the Data Subject, personal data may be processed without seeking express consent in the event that data processing is necessary for the legitimate interests of Limak (e.g., monitoring of the premises with CCTV equipment in order to ensure security).

5.6.3. Processing of sensitive personal data

We process sensitive personal data (excluding data relating to health and sex life) by taking the administrative and technical measures prescribed by the PDP Board, with the Data Subject's express consent or as required by the regulations.

Sensitive personal data regarding health and sex life can only be processed for the purposes of maintaining public health, preventive medicine, medical diagnosis, treatment and care services, financial planning and management of medical services, by people with confidentiality commitments or by the authorized agencies and organizations, without express consent.

5.7. Processing of personal data collected in the context of access to wireless networks

Wireless internet service is provided at the Company, and pursuant to applicable regulations, Limak is considered a “*Mass Use Internet Connection Provider*” regarding this service.

The IP address, start and end time of use, MAC address, destination IP address, port, name, surname, Turkish ID number and mobile phone number details of the Data Subjects who wish to use the internet service provided by Limak are processed.

5.8. Processing of personal data collected for human resources and employment purposes

We process your personal data that you share with us during the applications you will make as an employee candidate or intern candidate for the following purposes, including but not limited to the “*Executing Employee Candidate / Intern / Trainee Selection and Placement Processes*”, and, with your consent, store them for the required period of time for consideration for future positions at Limak.

The processing of the personal data you share as an employee candidate and intern candidate is carried out in accordance with the principles and rules set out in this Policy.

The personal data belonging to intern candidates are processed for;

- Executing employee candidate / intern / trainee selection and placement processes,
- Planning human resources processes, and carrying out contract-execution processes,

and are gathered using the following tools and methods:

- Hard copy of the application form submitted,
- Resumes submitted by the intern candidates to Limak via mail, e-mail, etc.

Our intern candidates are also provided with information about the rules regarding the processing of their personal data.

The personal data belonging to employee candidates are processed for;

- Executing employee candidate / intern / trainee selection and placement processes,
- Executing employee candidate application processes,
- Planning human resources processes,

and are gathered using the following tools and methods:

- Hard copy of the application form submitted,
- Resumes submitted by the employee candidates to Limak via mail, e-mail, etc.
- Private employment agencies (Kariyer.net, Secretcv.com, LinkedIn etc.).

Our employee candidates are also provided with information about the rules regarding the processing of their personal data.

5.9. Processing of personal data in the context of providing general security

At Limak, we capture camera footage of the persons in our facilities through CCTV (closed circuit camera recording systems) and store these for the periods stipulated by applicable regulations, and delete, destroy and anonymize them in accordance with the Data Retention and Disposal Policy.

In order to ensure that the data processing activity is compliant with the principles set out in the KVKK, we limit the areas under surveillance, the frequency and time of monitoring by security cameras as per the requirements needed to achieve the security purpose (e.g. building entrances and exits and areas such as data centers where access must be controlled). Areas that may result in interference with a person's privacy beyond the scope of security purposes (e.g. in toilets) are not subject to surveillance.

Only a limited number of employees have access to live camera footage and digitally recorded and stored records. The limited number of persons who have access to the records have undertaken to maintain the confidentiality of the data they access, with the confidentiality commitment attached to the present Policy (see Appendix-5).

6. TRANSFER OF PERSONAL DATA

6.1. Domestic transfer of personal data

At Limak, we comply with the regulations stipulated in the KVKK and the decisions taken by the PDP Board regarding the transfer of personal data.

Without prejudice to the grounds for compliance with the law as provided in the regulations, personal data and sensitive personal data shall not be transferred to third parties without express consent of the Data Subject.

6.2. Overseas transfer of personal data

As a rule, personal data cannot be transferred abroad without the express consent of the Data Subject.

However, the transfer overseas can be effected without express consent in the presence of one of the grounds for compliance with law set forth in this Policy, with the requirement that;

- the third party to whom the transfer will be made abroad is a resident of one of the countries deemed safe by the PDP Board,
- in cases where the third party to whom the transfer will be made abroad is not a resident of a country deemed safe by the PDP Board, Limak and the data controller residing in a non-safe country extend written commitment to provide adequate protection and the PDP Board grants permission for such transfer overseas.

Due to the fact that our business activity at Limak covers energy consumption/accreditation/tender services, in Turkey as well as abroad, if the process in which your data is processed is related to abroad, the specific data limited to these persons and processes may be shared with customers, suppliers as well as natural persons or private law legal entities authorized by these, and foreign government agencies and entities in case of regulatory obligations in the relevant country, by taking the necessary technical and administrative measures for the purpose of conducting business activities, in accordance with the rules set forth in KVKK.

6.3. Third parties to whom personal data are transferred by Limak

Personal data may be transferred to the recipients/recipient groups listed below in accordance with the rules set forth in this Policy:

- Authorized Government Agencies and Entities
- Subsidiaries and Affiliated Companies
- Natural Persons or Private Law Legal Entities
- Suppliers

Buyer Groups	Remarks	Transfer Purpose
Authorized Government Agencies and Entities	This term refers to the government agencies and entities that are authorized to receive information and documents from Limak within the scope of applicable regulations.	The data can be transferred to these entities for the purposes of carrying out activities in accordance with the regulations, fulfilling the obligations arising from the employment contracts and the regulations concerning the employees, informing authorized persons, institutions and organizations, and carrying out occupational health/safety activities within the scope stipulated by the relevant regulations.
Subsidiaries and Affiliated Companies	The term refers to Limak's subsidiaries and affiliates that have organic ties with the company structure.	In line with the planning and execution of the activities of Limak's subsidiaries and affiliates that have organic ties with the company structure, the data may be transferred for the purposes of planning human resources processes, carrying out audit/ethics activities, implementing remuneration policies and managing finance and accounting operations.
Natural Persons or Private Law Legal Entities	The term refers to the natural persons or private law legal entities with whom Limak has concluded contracts within the scope of its commercial activities.	Within the scope of the business activities carried out by Limak, the data may be transferred to these persons or entities for the purposes of conducting financial and accounting activities and carrying out the company's operations in accordance with the regulations.
Suppliers	The term refers to the parties that provide services or products to Limak to meet Limak's requirements, in accordance with its instructions pursuant to a contract.	The data may be transferred to these entities for the purposes of carrying out the procurement processes of goods/services, managing financial and accounting operations, executing contract processes, and conducting training activities so that the product or service to be procured from the supplier can be provided to Limak.

7. STORAGE OF PERSONAL DATA

Without prejudice to the retention periods stipulated in the regulations, we store personal data for the period required by the purpose of processing personal data and within the scope of our Personal Data Retention and Disposal Policy attached to this Policy (See Appendix-4).

In cases where we process personal data for more than one purpose, the data is deleted, destroyed or anonymized in the event that all of the purposes for processing the data cease to apply, or upon the request of the Data Subject, provided that there is no obstacle in the regulations to the deletion of the data. The provisions of the regulations and the decisions of the PDP Board shall be observed in matters of destruction, deletion or anonymization.

8. DELETION, DESTRUCTION, OR ANONYMIZATION OF PERSONAL DATA

Personal data collected for our processing purposes are processed and stored within the scope of such processing purposes and applicable regulations.

Personal data are deleted, destroyed or anonymized;

- In case none of the purposes of processing apply any longer, or
- Upon the request of the Data Subject, provided that the requirements applicable are met.

Such deletion, destruction and anonymization procedures are carried out within the scope of our Personal Data Retention and Disposal Policy (See Appendix-4), without prejudice to the provisions of applicable regulations.

When your personal data is deleted, destroyed or anonymized, the security measures in this Policy and the Personal Data Retention and Disposal Policy are implemented.

Records of the procedures for the deletion, destruction or anonymization of personal data are kept for at least 3 (three) years, without prejudice to the provisions of other laws and regulations.

Unless stipulated otherwise by the PDP Board, Limak shall choose the appropriate method of deleting, destroying or anonymizing personal data. Should the Data Subject request so, the appropriate method shall be selected with justification provided.

9. SECURITY OF PERSONAL DATA

9.1. Our Obligations to Secure Personal Data

At Limak, we take due administrative and technical measures based on the technological capabilities and the cost of implementation;

- To prevent illegal processing of personal data,
- To prevent illegal access to personal data,

- To prevent illegal retention of personal data.

9.2. Technical and Administrative Measures Taken to Prevent Illegal Processing of Personal Data

- Network security and application security are ensured,
- A closed network is used for personal data transfers through the network,
- Security measures are applied within the scope of procurement, development and maintenance of information technology systems,
- Personal data stored in the cloud is secured,
- Training and awareness raising activities on data security for employees are carried out at regular intervals,
- An authorization matrix is developed for employees,
- Access logs are kept regularly,
- Corporate policies on access, information security, use, storage and disposal are in place,
- Confidentiality agreements are in place,
- The authorizations of the employees who are reassigned or leave their jobs are revoked,
- Up-to-date anti-virus systems are in use,
- Firewalls are used,
- Personal data security policies and procedures are established,
- Personal data security issues are reported promptly,
- The security of personal data is monitored,
- Necessary security measures govern entrances to and exits from physical environments containing personal data,
- Physical environments containing personal data are secured against external risks (fire, flood, etc.),
- The environments containing personal data are secured,
- The principle of data minimization proportionate to the purpose of processing personal data is applied,
- Personal data is backed up and the security of the backed up personal data is also ensured,
- User account management and authorization control systems are implemented and monitored,
- Regular and/or random internal audits are conducted and commissioned,
- Logs are kept in a way to avoid user intervention,
- Existing risks and threats are identified,
- Attack detection and prevention systems are employed,
- Penetration testing is applied,
- Cyber security measures are in place and their implementation is continuously monitored,
- Encryption is applied, and
- The awareness of data processing service providers is ensured.

9.3. Measures Taken in Case of Illegal Disclosure of Personal Data

We take administrative and technical measures to prevent illegal disclosure of personal data and keep them up-to-date in accordance with our relevant procedures. We have developed the necessary systems and infrastructures to report any identified case of unauthorized disclosure of personal data, to the Data Subject and the PDP Board.

Any illegal disclosure to occur in spite of all administrative and technical measures taken, may be announced on the website of the PDP Board or by another means, should the PDP Board deem it necessary.

10. RIGHTS OF THE DATA SUBJECT

Within the scope of our disclosure obligation, we inform the Data Subject and establish the necessary systems and infrastructures for providing such information. We apply the technical and administrative procedures necessary for the Data Subject to exercise her rights regarding her personal data.

The Data Subject has the following rights in relation to her personal data:

- To find out whether her personal data has been processed or not,
- If the personal data has been processed, to request information in relation to such processing,
- To find out the grounds for processing the personal data, and whether these are used for the intended purpose,
- To learn about the third parties to whom personal data are transferred within the country or abroad,
- To demand correction in the event of incomplete or incorrect processing of personal data,
- To request deletion or destruction of personal data in case grounds for processing personal data no longer apply,
- To demand the notification of the third parties to which personal data was transferred, about any such correction, deletion or destruction mentioned to above,
- To object to any negative consequences which may arise through the analysis of processed data exclusively through automatic systems, and
- To demand damages should any losses be incurred due to the illegal processing of personal data.

10.1. Exercise of the rights regarding personal data

You can communicate your applications and requests regarding your personal data to Limak Yenilenebilir Enerji A.Ş., using, as per your choice, the Data Subject Application Form (See Appendix-4);

- Sending a copy bearing physical signature along with a photocopy of your ID, to the address Hafta Sokak No:9 GOP ÇANKAYA / ANKARA,
- Filing a personal application with Limak Yenilenebilir Enerji A.Ş., submitting a valid ID,

- Sending the form bearing mobile signature or secure electronic signature, to the address kvkk_yenilenebilir@limak.com.tr via e-mail,
- Sending the form to our registered electronic mail address limakyenilenebilirenerji@hs02.kep.tr using a registered electronic mail (KEP) address and secure electronic signature or mobile signature,

Or any other method to be stipulated by the Personal Data Protection Board, should it do so.

Pursuant to the Communiqué on the Procedures and Principles of Application to the Data Controller (“**Communiqué**”), the application of the Data Subject must include her name, surname, signature if the application is made in writing, Turkish ID number (if the applicant is a foreigner, her nationality, passport number or ID number, if any), residence or work address for notification, e-mail address, telephone number and fax number for notification, if any, and information on the subject of the request.

The Data Subject must clearly and comprehensibly state the matter requested in the application for the exercise of the above-mentioned rights, including explanations regarding the right requested to be exercised. Information and documents related to the application must be attached to the application.

In the event that the information regarding your requests submitted within the scope of your application are not accurate and up-to-date, with false / misleading information or in case of lacking authority for the application, the application shall be rejected and legal action shall be taken against the person who has committed such irregular action.

Although, as a rule, the request must be related to the applicant's person, if acting on behalf of someone else, the applicant must be specifically authorized and such authorization must be documented (power of attorney). Requests made by unauthorized third parties on behalf of someone else shall not be processed. In addition, as the data controller, in order to prevent any unauthorized access to personal data by third parties through a Data Subject application and to ensure the security of your personal data, we require the submission of identity and address information, and documents confirming identity (copy of identity card, etc.) as attachments to the application.

10.2. Processing of the application

10.2.1. Time frame for responding to the application

Pursuant to Article 13, paragraph one of KVKK; applications regarding these matters must be lodged with Limak as the data controller. Pursuant to Article 6 of the Communiqué, your request will be processed free of charge as soon as possible and within thirty days from the date of receipt, depending on the nature of the request (See Appendix-4). However, if the procedure requires an additional cost, a fee may be charged as per article 7 of the Communiqué.

10.2.2. Our right to dismiss the application

Applications regarding personal data may be dismissed in certain cases, including but not limited to those listed below:

- Processing of personal data for research, planning, and statistics purposes, through anonymization using official statistics,
- Processing of personal data for art, history, literature or science purposes or within the framework of the freedom of expression, provided that such processing is not a criminal offence or a violation of the Data Subject's privacy and personal rights,
- Processing of personal data made public by the Data Subject herself,
- The application is without legitimate grounds,
- The application contains a request contrary to the applicable regulations, and
- The application is not compliant with due procedure.

10.3. Application processing procedure

In order for the response period specified in Article 10.2.1 of this Policy to commence, applications must be made as specified in Article 10.1 titled “*Exercise of the rights regarding personal data*”.

If the request is accepted, the necessary procedures are implemented and the applicant is notified in writing or electronically. If the request is dismissed, the applicant shall again be notified in writing or electronically, with justification.

10.4. Right of complaint to the Personal Data Protection Board

In cases where the application is dismissed, the response is considered unsatisfactory or the response is not given in due time; the applicant has the right to file a complaint with the PDP Board within 30 (thirty) days from the date of learning the response and in any case within 60 (sixty) days from the date of application (See Appendix-4).

11. PUBLICATION AND STORAGE OF THE POLICY

The signed copy of the Policy is kept by the Company contact person and the most up-to-date version of the Policy is made available to employees electronically via the Company intranet.

12. UPDATE FREQUENCY

This Policy shall be reviewed at least once a year without any notice, and updated if deemed necessary.

13. FORCE

This Policy have entered into force through Limak Board of Directors approval decision dated 23/12/2019 and numbered 2019/12.

14. APPENDICES

APPENDIX-1:

- General Disclosure
- Disclosure for Employees
- Disclosure for Prospective Employees
- Disclosure for Interns
- Disclosure for Supplier Officers
- Disclosure for Supplier Employees
- Disclosure for Business Partners
- Disclosure for Shareholders/Partners
- Disclosure for Member of the Board of Directors
- Disclosure for Visitors
- Disclosure for Product or Service Recipients (Customers)
- Disclosure for Government Officials
- Disclosure for Third Parties
- Disclosure for Members of the Press

APPENDIX-2:

- Employee Candidate Consent for Contacting References and Sharing Information with Group Companies
- Third Party Event Disclosure and Consent
- Employee Event Consent
- Consent for the Processing of Employee's Blood Type Data

APPENDIX-3:

- Protocol between Data Controller (Limak) and Data Processor
- Protocol between Data Controller and Data Processor (Limak)
- Protocol between Data Controllers
- Protocol between Data Processor and Sub-Data Processor

APPENDIX-4:

- Personal Data Retention and Disposal Policy
- Personal Data Disposal Record
- Data Subject Application Form
- Data Subject Application Process
- Data Subject Complaint Process
- Personal Data Breach Report Form

APPENDIX-5:

- Confidentiality, Non-Disclosure, and Personal Data Protection Agreement for Employees