

**OTOKAR OTOMOTİV VE  
SAVUNMA SANAYİ A.Ş.  
PERSONAL DATA PROTECTION  
AND PROCESSING  
POLICY**

**OTOKAR OTOMOTİV VE SAVUNMA SANAYİ A.Ş.**  
**PERSONAL DATA PROTECTION AND PROCESSING POLICY**  
**INFORMATION FORM**

**Document Name:**

Otokar Otomotiv ve Savunma Sanayi A.Ş. Personal Data Protection and Processing Policy

**Target Audience:**

All real persons whose personal data are being processed by Otokar Otomotiv ve Savunma Sanayi A.Ş. except the employees of Otokar Otomotiv ve Savunma Sanayi A.Ş.

**Prepared by:**

Otokar Otomotiv ve Savunma Sanayi A.Ş. Personal Data Protection Committee

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**Approved by:**

Otokar Otomotiv ve Savunma Sanayi A.Ş. Senior Management

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In cases of a conflict between the Turkish Policy and any translation of it, the Turkish text shall prevail.

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## 1. SECTION 1 - INTRODUCTION

### 1.1. Introduction

The protection of personal data is among the top priorities of Otokar Otomotiv ve Savunma Sanayi A.Ş. ("**Company**"). Within the framework of this Otokar Otomotiv ve Savunma Sanayi A.Ş. Personal Data Protection and Processing Policy ("**Policy**"), the principles adopted during the personal data processing activities carried out by the Company and the main principles adopted in terms of compliance of the Company's data processing activities with the provisions of Personal Data Protection Law numbered 6698 ("**Law**") are explained and thus our Company provides the necessary transparency by informing data subjects. With the full awareness of our responsibility within this scope, your personal data is processed and protected in accordance with this Policy.

Activities carried out by our Company regarding the protection of our employees' personal data are governed under the Otokar Otomotiv ve Savunma Sanayi A.Ş. Employee Personal Data Protection and Processing Policy which is drafted in line with the principles within this Policy.

### 1.2. Scope

This Policy regards all personal data of persons other than the Company employees, processed by automated means or by non-automated means, provided that they are part of any data filing system. Detailed information on the said data subjects is provided under ANNEX 2 ("*ANNEX 2- Data Subjects*") of this Policy.

### 1.3. Implementation of the Policy and the Relevant Legislation

The relevant applicable legal provisions regarding the processing and protection of personal data shall be enforced primarily. In case of an inconsistency between the applicable legislation and the Policy, the Company accepts that the applicable legislation shall be enforced. The Policy sets out the rules laid out by the relevant legislation by embodying them within the scope of the Company's practices.

### 1.4. The Enforcement of the Policy

This Policy drafted by our Company is dated 24/03/2026. In case of a renewal of certain articles or all of the Policy, the effective date of the Policy shall be updated. The Policy is published on the Company's website [https://www.otokar.com.tr/getmedia/0a9b182d-d72b-4303-82cb-c2916c90a918/Personal\\_Data\\_Protection\\_Policy](https://www.otokar.com.tr/getmedia/0a9b182d-d72b-4303-82cb-c2916c90a918/Personal_Data_Protection_Policy) and made available to the relevant persons upon the request of data subjects.

## 2. SECTION 2 – MATTERS RELATING TO THE PERSONAL DATA PROTECTION

### 2.1. Ensuring the Security of Personal Data

In accordance with Article 12 of the Law, our Company takes necessary measures according to the nature of the data to be protected in order to prevent the unlawful disclosure, access, transfer of personal data or other security deficiencies that may occur in other ways. Within this scope, our Company takes administrative and technical measures, conducts audits or have third parties conduct audits in order to provide required level of security in accordance with the guidelines published by the Personal Data Protection Board ("**Board**").

### 2.2. Protection of Special Categories of Personal Data

Special categories of personal data is given special importance under the Law due to the risk of causing victimization or discrimination when processed unlawfully. In accordance with Article 6 of the Law, "special categories" of personal data are defined as race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership to associations, foundations

or union membership, criminal conviction and security measures, health, sexual life, and biometric and genetic data.

The technical and administrative measures taken by our Company for the protection of personal data and the adequate measures stipulated in the Board's Decision No. 2018/10 dated 31/01/2018 in terms of special categories of personal data are taken within the scope described in the Data Security Policy for the Processing of Special Categories of Personal Data and the works carried out in this direction are monitored and audited within the framework of the audits carried out within our Company.

Detailed information regarding the processing of special categories of personal data is given under the section 3.3 ("*Processing of Special Categories of Personal Data*") of the Policy.

### **2.3. Increasing Awareness of Business Units on the Protection and Processing of Personal Data and their Auditing**

Our Company ensures that the necessary training courses are organized for business units in order to raise awareness to prevent personal data from being processed unlawfully, to prevent illegal access to data, and to ensure data security. The training and awareness activities organized by the Company are based on the "Personal Data Security Guide" published by the Board on its official website.

With the trainings and awareness activities carried out, it is aimed to ensure that the personal data processing activities of our Company's employees during the fulfillment of their job duties are carried out in accordance with the Law and secondary legislation.

Our Company establishes necessary systems to create awareness among its current employees and new employees regarding the protection of personal data and works with consultants if needed. Accordingly, our Company evaluates the participation to relevant training courses, seminars and informative sessions and updates and organizes new training courses in parallel with the developments of the relevant legislation.

## **3. SECTION 3 – MATTERS RELATING TO THE PROCESSING OF PERSONAL DATA**

### **3.1. Processing of Personal Data in Compliance with the Principles Provided within the Legislation**

#### **3.1.1. Processing in accordance with the Lawfulness and Fairness Rule**

Personal data are processed in accordance with the general good faith and fairness rule without violating the fundamental rights and freedoms of individuals. Within this framework, personal data are solely processed to the extent required by the business activities of our Company.

#### **3.1.2. Ensuring that Personal Data is Accurate and Up to Date Where Necessary**

Our Company takes necessary measures to keep the personal data accurate and up to date during the processing of personal data and establishes necessary mechanisms for ensuring the accuracy and currency of the personal data for certain periods.

#### **3.1.3. Processing for Specific, Explicit and Legitimate Purposes**

Our Company explicitly reveals the purposes of processing personal data and processes the personal data in line with the business activities within the scope of the objectives associated with these activities.

### **3.1.4. Being Relevant, Limited and Proportionate to the Purposes for Which They are Processed**

Our Company only collects personal data to the extent required by business activities and processes them solely for the specified purposes.

### **3.1.5. Storing for the Period Foreseen by the Relevant Legislation or Required for the Processing Purpose**

Our Company retains personal data during the period required for the purpose of processing, and the minimum time stipulated in the relevant legal legislation. Within this scope, our Company firstly determines whether a period is provided for the retention of personal data in the relevant legislation and acts according to this period if determined. If there is no legal period, personal data are stored for the period required for the purpose of processing. Personal data are destroyed at the end of the specified retention periods in accordance with the periodic destruction periods or upon data subject's requests with the specified destruction methods (deletion and / or destruction and / or anonymization).

## **3.2. Conditions for Processing Personal Data**

Except for the explicit consent of the data subject, the basis of the personal data processing activity may be just one of the following conditions or multiple conditions may be the basis of the same personal data processing activity. In the event that personal data is considered as special categories of personal data, provisions under the section 3.3 ("*Processing of Special Categories of Personal Data*") of this Policy shall be applied.

### **(i) Existence of Data Subject's Explicit Consent**

One of the conditions for processing personal data is the explicit consent of the data subject. The explicit consent of the data subject should be specific, informed and freely given.

Personal data shall be processed without the explicit consent of the data subject in the presence of the following personal data processing conditions.

### **(ii) Expressly Provided by the Laws**

If the personal data of the data subject is expressly provided in the law, in other words, if there is an explicit provision in the law regarding the processing of personal data, this data processing condition shall be applicable.

### **(iii) Failure to Obtain the Explicit Consent of the Data Subject Due to Physical integrity**

Personal data of the data subject shall be processed if it is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to present his/her consent due to the physical disability or whose consent cannot be deemed legally valid.

### **(iv) Being Directly Related to the Establishment or Performance of Contract**

This condition shall be deemed fulfilled if it is necessary to process personal data provided that it is directly related to the establishment or performance of a contract to which data subject is a party.

### **(v) Fulfilment of Legal Obligations by the Company**

Personal data of the data subject shall be processed if the processing is necessary for the Company to fulfil its legal obligations.

**(vi) Publicization of Personal Data by Data Subject**

If personal data have been made public by the data subject himself/herself, such personal data shall be processed limited to the purpose of publicization.

**(vii) Being Necessary for the Establishment or Protection of a Right**

Personal data of the data subject shall be processed if data processing is necessary for the establishment, exercise, or protection of a right.

**(viii) When Data Processing is Necessary for the Legitimate Interests of the Company**

Personal data of the data subject shall be processed if the processing of data is necessary for the legitimate interests of the Company, provided that the fundamental rights and freedoms of the data subject are not violated.

**3.3. Processing of Special Categories of Personal Data**

Processing special categories of personal data is prohibited as a rule. However, Company processes special categories of personal data in accordance with the principles set forth in this Policy and in the existence of the following grounds specified in Article 6 of the Law:

**(i) Explicit Consent of the data subject**

One of the conditions for processing special categories of personal data is the explicit consent of the data subject. The explicit consent of the data subject must be related to a specific subject, based on information and freely given.

In the presence of the following special categories of personal data processing conditions, personal data may be processed without the explicit consent of the data subject:

**(ii) Explicitly Stipulated by Laws**

If the special categories of personal data of the data subject are explicitly stipulated in the law, in other words, if there is a clear provision in the relevant law regarding the processing of special categories of personal data, this data processing condition may be mentioned.

**(iii) Failure to Obtain Explicit Consent of the Data Subject Due to Physical Disability**

The personal data of the data subject may be processed if it is mandatory to process the personal data of the data subject in order to protect the life or physical integrity of the data subject or another person who is unable to disclose his/her consent due to actual impossibility or whose consent cannot be recognized as valid.

**(iv) Publicization of Special Categories of Personal Data of the Data Subject**

In the event that the data subject has made his/her special categories of personal data public in accordance with his/her own will to make it public, the relevant special categories of personal data may be processed limited to the purpose of making it public.

**(v) Data Processing is Mandatory for the Establishment or Protection of a Right**

If data processing is mandatory for the establishment, exercise or protection of a right, the special categories of personal data of the data subject may be processed.

**(vi) Processing is Necessary within the Scope of Relevant Purposes by Persons Under Secrecy Obligation or Authorized Institutions and Organizations**

Special categories of personal data of the data subject may be processed by persons under the obligation of confidentiality or authorized institutions and organizations; if necessary for the

protection of public health, preventive medicine, medical diagnosis, treatment and care services, and the planning, management and financing of health services.

**(vii) Processing for the Fulfillment of Legal Obligations Regarding Employment, Occupational Health and Safety, Social Security, Social Services and Social Assistance**

In the event that it is mandatory to fulfill legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance, the special categories of personal data of the data subject may be processed.

**(viii) Processing Regarding Foundations, Associations and Other Non-Profit Organizations or Entities Established for Political, Philosophical, Religious or Trade Union Purposes**

Foundations, associations and other non-profit organizations or formations established for political, philosophical, religious or trade union purposes; provided that they comply with the legislation to which they are subject and their purposes, are limited to their fields of activity and are not disclosed to third parties; may process special categories of personal data of the data subject for their current or former members and members or persons who are in regular contact with these organizations and formations.

**3.4. Informing the Data Subject**

Our Company may transfer the data subject's personal data and special categories of personal data to third parties (third-party companies, group companies, and third-party natural persons) by taking the necessary security measures in line with lawful personal data processing purposes. In this respect, our Company acts in compliance with the provisions set forth under Article 8 of the Law. Detailed information on this matter is available in Annex 4 of this Policy ("*Annex 4 – Third Parties to whom Personal Data are Transferred by the Company and the Purposes of Transfer*").

**3.5. Transfer of Personal Data**

Our Company shall transfer personal data and special categories of personal data of the data subject to third parties (public institutions, vendors, etc.) for lawful processing purposes by taking necessary security measures. Accordingly, our Company acts in accordance with the regulations stipulated in the Article 8 of the Law. Detailed information regarding this may be found under the ANNEX 4 ("*ANNEX 4- Third Parties to whom Personal Data are Transferred by the Company and the Purposes of Transfer*") of this Policy.

**3.5.1. Transfer of Personal Data to Domestic Third Parties**

If one or more of the following data processing conditions ("Data Processing Conditions") are present, personal data may be transferred to third parties by our Company by taking all necessary measures and taking all necessary security measures, including the methods stipulated by the Board.

- Consent of the data subject to the transfer of his/her personal data to domestic third parties,
- Relevant activities regarding the transfer of personal data are expressly stipulated in the laws,
- Transfer of personal data by the Company is directly related to and necessary for the establishment or performance of a contract,
- Transfer of personal data is necessary for our Company to fulfill its legal obligations,
- Transfer of personal data by our Company limited to the purpose of making it public, provided that the personal data have been made public by the data subject,
- Transfer of personal data by the Company is necessary for the establishment, exercise or protection of the rights of the Company or the data subject or third parties,
- Transfer of personal data is necessary for the legitimate interests of the Company, provided that it does not violate the fundamental rights and freedoms of the data subject,

- It is necessary for the protection of the life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid.

### **3.5.2. Transfer of Personal Data to Third Parties Residing Abroad**

The transfer of personal data abroad by our Company will be carried out in accordance with Article 9 of the Law and the principles set out in this Policy by taking technical and administrative measures in the scope described below:

#### **(i) Transfer Based on the Adequacy Decision Made About the Relevant Country, International Organization or Sectors within the Country**

Personal data may be transferred abroad by the Company if one of the conditions specified in Articles 5 and 6 of the Law exists and there is an adequacy decision issued by the Board regarding the country, international organization or sectors within the country to which the transfer will be made.

The adequacy decision is issued by the Board and published in the Official Gazette. The Board may also seek the opinion of relevant institutions and organizations if necessary. The adequacy decision is evaluated every four years at the latest. The Board may modify, suspend or revoke the adequacy decision with prospective effect as a result of the assessment or as otherwise deemed necessary.

#### **(ii) Transfer Based on Appropriate Safeguards**

In the absence of an adequacy decision, personal data may be transferred abroad by the Company if one of the following appropriate safeguards is provided by the parties, provided that one of the personal data processing conditions specified in Articles 5 and 6 of the Law exists and the data subject has the opportunity to exercise his/her rights and apply for effective legal remedies in the country where the transfer will be made:

- **Special Transfer Reason for Public Institutions and Organizations or Professional Organizations of Public Nature:** Existence of an agreement that is not in the nature of an international agreement between public institutions and organizations or international organizations abroad and public institutions and organizations or professional organizations in the nature of a public institution in Türkiye and the Board's authorization of the transfer.
- **Binding Corporate Rules:** Existence of binding corporate rules approved by the Board and containing provisions on the protection of personal data, which companies within the group of undertakings engaged in joint economic activities are obliged to comply with.
- **Standard Contracts:** Existence of a standard contract announced by the Board, including data categories, purposes of data transfer, recipients and recipient groups, technical and administrative measures to be taken by the data importer, additional measures taken for special categories of personal data, and notifying the Board about this standard contract within the legal periods.
- **Undertaking:** Existence of a written undertaking containing provisions to ensure adequate protection and authorization of the transfer by the Board.

#### **(iii) Transfer Based on Derogations**

Personal data may be transferred abroad by the Company in the absence of an adequacy decision and if one of the appropriate safeguards cannot be provided, provided that it is incidental, in the presence of one of the following situations:

- **Informed Special Explicit Consent for Possible Risks:** The explicit consent of the data subject to the transfer, provided that the data subject is informed about the possible risks.

- **Execution of the Contract and Implementation of Pre-Contractual Measures:** The transfer is necessary for the performance of a contract between the data subject and the controller or for the implementation of pre-contractual measures taken upon the request of the data subject.
- **Third Party Contracts for the Benefit of the Data Subject:** The transfer is necessary for the conclusion or performance of a contract between the controller and another natural or legal person for the benefit of the data subject.
- **Necessity for Important Reasons of Public Interest:** The transfer is necessary for an important reason of public interest.
- **Establishment, Exercise or Protection of a Right:** The transfer of personal data is mandatory for the establishment, exercise or protection of a right.
- **Vital Interest:** The transfer of personal data is mandatory for the protection of the life or physical integrity of the person or another person who is unable to disclose his consent due to actual impossibility or whose consent is not legally valid.
- **Transfer from Public Registers:** Transfer from a registry open to the public or persons with legitimate interests, provided that the conditions required to access the registry in the relevant legislation are met and the person with a legitimate interest requests it.

### **3.5.3. Domestic Transfer of the Special Categories of Personal Data**

Transfer of special categories of personal data is prohibited as a rule. However, Company processes special categories of personal data in accordance with the principles set forth in this Policy and in the existence of the following grounds specified in Article 6 of the Law:

#### **(i) Explicit Consent of the data subject**

One of the conditions for processing special categories of personal data is the explicit consent of the data subject. The explicit consent of the data subject must be related to a specific subject, based on information and freely given.

In the presence of the following special categories of personal data processing conditions, personal data may be processed without the explicit consent of the data subject:

#### **(ii) Explicitly Stipulated by Laws**

If the special categories of personal data of the data subject are explicitly stipulated in the law, in other words, if there is a clear provision in the relevant law regarding the processing of special categories of personal data, this data processing condition may be mentioned.

#### **(iii) Failure to Obtain Explicit Consent of the Data Subject Due to Physical Disability**

The personal data of the data subject may be processed if it is mandatory to process the personal data of the data subject in order to protect the life or physical integrity of the data subject or another person who is unable to disclose his/her consent due to actual impossibility or whose consent cannot be recognized as valid.

#### **(iv) Publicization of Special Categories of Personal Data of the Data Subject**

In the event that the data subject has made his/her special categories of personal data public in accordance with his/her own will to make it public, the relevant special categories of personal data may be processed limited to the purpose of making it public.

#### **(v) Data Processing is Mandatory for the Establishment or Protection of a Right**

If data processing is mandatory for the establishment, exercise or protection of a right, the special categories of personal data of the data subject may be processed.

**(vi) Processing is Necessary within the Scope of Relevant Purposes by Persons Under Secrecy Obligation or Authorized Institutions and Organizations**

Special categories of personal data of the data subject may be processed by persons under the obligation of confidentiality or authorized institutions and organizations; if necessary for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, and the planning, management and financing of health services.

**(vii) Processing for the Fulfillment of Legal Obligations Regarding Employment, Occupational Health and Safety, Social Security, Social Services and Social Assistance**

In the event that it is mandatory to fulfill legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance, the special categories of personal data of the data subject may be processed.

**(viii) Processing Regarding Foundations, Associations and Other Non-Profit Organizations or Entities Established for Political, Philosophical, Religious or Trade Union Purposes**

Foundations, associations and other non-profit organizations or formations established for political, philosophical, religious or trade union purposes; provided that they comply with the legislation to which they are subject and their purposes, are limited to their fields of activity and are not disclosed to third parties; may process special categories of personal data of the data subject for their current or former members and members or persons who are in regular contact with these organizations and formations.

**3.5.4. Transfer of Special Categories of Personal Data to Third Parties Residing Abroad**

The transfer of special categories of personal data abroad by our Company will be carried out in accordance with Article 9 of the Law and the principles set out in this Policy by taking technical and administrative measures in the scope described below:

**(i) Transfer Based on the Adequacy Decision Made About the Relevant Country, International Organization or Sectors within the Country**

Personal data may be transferred abroad by the Company if one of the conditions specified in Articles 5 and 6 of the Law exists and there is an adequacy decision issued by the Board regarding the country, international organization or sectors within the country to which the transfer will be made.

The adequacy decision is issued by the Board and published in the Official Gazette. The Board may also seek the opinion of relevant institutions and organizations if necessary. The adequacy decision is evaluated every four years at the latest. The Board may modify, suspend or revoke the adequacy decision with prospective effect as a result of the assessment or as otherwise deemed necessary.

**(ii) Transfer Based on Appropriate Safeguards**

In the absence of an adequacy decision, personal data may be transferred abroad by the Company if one of the following appropriate safeguards is provided by the parties, provided that one of the personal data processing conditions specified in Articles 5 and 6 of the Law exists and the data subject has the opportunity to exercise his/her rights and apply for effective legal remedies in the country where the transfer will be made:

- **Special Transfer Reason for Public Institutions and Organizations or Professional Organizations of Public Nature:** Existence of an agreement that is not in the nature of an international agreement between public institutions and organizations or international organizations abroad and public institutions and organizations or professional

organizations in the nature of a public institution in Türkiye and the Board's authorization of the transfer.

- **Binding Corporate Rules:** Existence of binding corporate rules approved by the Board and containing provisions on the protection of personal data, which companies within the group of undertakings engaged in joint economic activities are obliged to comply with.
- **Standard Contracts:** Existence of a standard contract announced by the Board, including data categories, purposes of data transfer, recipients and recipient groups, technical and administrative measures to be taken by the data importer, additional measures taken for special categories of personal data, and notifying the Board about this standard contract within the legal periods.
- **Undertaking:** Existence of a written undertaking containing provisions to ensure adequate protection and authorization of the transfer by the Board.

### (iii) Transfer Based on Derogations

Personal data may be transferred abroad by the Company in the absence of an adequacy decision and if one of the appropriate safeguards cannot be provided, provided that it is incidental, in the presence of one of the following situations:

- **Informed Special Explicit Consent for Possible Risks:** The explicit consent of the data subject to the transfer, provided that the data subject is informed about the possible risks.
- **Execution of the Contract and Implementation of Pre-Contractual Measures:** The transfer is necessary for the performance of a contract between the data subject and the controller or for the implementation of pre-contractual measures taken upon the request of the data subject.
- **Third Party Contracts for the Benefit of the Data Subject:** The transfer is necessary for the conclusion or performance of a contract between the controller and another natural or legal person for the benefit of the data subject.
- **Necessity for Important Reasons of Public Interest:** The transfer is necessary for an important reason of public interest.
- **Establishment, Exercise or Protection of a Right:** The transfer of personal data is mandatory for the establishment, exercise or protection of a right.
- **Vital Interest:** The transfer of personal data is mandatory for the protection of the life or physical integrity of the person or another person who is unable to disclose his consent due to actual impossibility or whose consent is not legally valid.
- **Transfer from Public Registers:** Transfer from a registry open to the public or persons with legitimate interests, provided that the conditions required to access the registry in the relevant legislation are met and the person with a legitimate interest requests it.

### 3.5.5 Transfer of Special Categories of Personal Data

Special categories of personal data may be transferred by our Company in accordance with the principles set forth in this Policy and by taking all necessary administrative and technical measures, including methods to be determined by the Board, and in the presence of the following conditions:

- (i) **Special categories of personal data, except for data concerning health and sexual life** may be processed without the explicit consent of the data subject if it is expressly provided in the law, in other words, if there is an explicit provision regarding the processing of personal data. Otherwise, in order to process such special categories of personal data, the explicit consent of the data subject shall be obtained.

(ii) **Personal data concerning health and sexual life** shall only be processed, without seeking explicit consent of the data subject, by authorized public institutions and organizations or persons subject to secrecy obligation for the purposes of protection of public health, operation of preventive medicine, medical diagnosis, treatment and nursing services, planning and management of health-care services as well as their financing. Otherwise, the explicit consent of the data subject shall be obtained.

In addition to the above, special categories of personal data may be transferred to Foreign Countries which provide Adequate Protection in the presence of any of the conditions set forth in subparagraphs (i) to (ii) above. In the absence of adequate protection, the personal data may be transferred to The Foreign Countries where the Data Controller Undertakes Adequate Protection in accordance with the data transfer conditions set forth in the legislation.

#### **4. SECTION 4 - CATEGORIZATION AND PROCESSING PURPOSES OF THE PERSONAL DATA PROCESSED BY OUR COMPANY**

Personal data are processed by our Company, by informing data subjects pursuant to the Article 10 of the Law and secondary legislation, in line with our Company's personal data processing purposes, based on at least one of the personal data processing conditions specified in the Articles 5 and 6 of the Law and in accordance with the general principles set forth in the Law, especially the principles regarding personal data processing specified in the Article 4 of the Law. Categories of personal data and detailed information on such categories may be found under the ANNEX 3 ("*ANNEX 3- Personal Data Categories*") of the Policy within the framework of the purposes and conditions stated in this Policy.

Detailed information on the said personal data processing purposes is defined under the ANNEX 1 ("*ANNEX 1- Purposes for Personal Data Processing*") of the Policy.

#### **5. SECTION 5 - PERSONAL DATA STORAGE AND DISPOSAL**

Our Company retains personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the legal legislation. Our Company first determines whether a period of time is stipulated for the retention of personal data in the relevant legislation, and if a period is determined, it acts in accordance with this period. If there is no legal period, personal data are retained for the period required for the purpose for which they are processed.

The personal data processed by our Company are handled on a categorical basis and maximum data retention periods have been determined for each category of personal data. These periods are set out in the table in our Company's Personal Data Retention and Disposal Policy. Personal data are disposed of at the end of the specified maximum retention periods in accordance with the periodic disposal periods or in accordance with the application of the data subject and with the specified disposal methods (deletion and/or destruction and/or anonymization).

#### **6. SECTION 6 – RIGHTS OF THE DATA SUBJECTS AND THEIR USAGE**

##### **6.1. Rights of the Data Subjects**

Data subjects are entitled to the following rights:

- (1) To learn whether his/her personal data are being processed,
- (2) To request information if his/her personal data have been processed,

- (3) To learn the purpose of the processing of his/her personal data and whether they have been used accordingly,
- (4) To learn to which domestic or foreign third parties his/her personal data has been transferred,
- (5) To request rectification in case his/her personal data has been processed incompletely or inaccurately and to demand the relevant process be reported to third parties to which his/her personal data has been transferred,
- (6) To demand the erasure or destruction of his/her personal data in case the reasons necessitating the processing have disappeared even though it was processed in accordance with the Law and other relevant provisions and to demand the process in this regard be reported to third parties to which his/her personal data has been transferred,
- (7) To object the occurrence of any consequence that is to his/her detriment by means of a analysis of personal data solely through automated systems,
- (8) To demand compensation for the damages suffered as a result of unlawful processing of his/her personal data.

### **6.2. Usage of Data Subject Rights**

Data subjects shall convey their requests regarding their rights listed in section 6.1 ("*Rights of the Data Subject*") to our Company by the methods determined by the Board. Accordingly, they may use the "Data Subject Application Form", available at the web address: <https://www.otokar.com.tr/getmedia/baff6225-4346-4a63-ba87-a7a7686c9943/data-subject-applicaton-form>

### **6.3. Our Company's Response to the Data Subject Requests**

Our Company shall take the necessary administrative and technical measures to conclude the requests made by the data subjects in accordance with the Law and secondary legislation.

In case the data subject duly submits his/her request regarding the rights stated in section 6.1 ("*Rights of the Data Subject*") to our Company; Company shall conclude (affirmative/negative) the request as soon as possible, within 30 days at the latest and in principle, free of charge depending on the nature of your request and shall inform the data subject in writing. However, if process requires additional costs, a fee may be demanded according to the tariff determined by the Board.

**ANNEX 1 – Personal Data Processing Purposes**

MAIN PURPOSES (PRIMARY)	SUB-PURPOSES (SECONDARY)
<p><b>Planning and Executing the Human Resources Policies and Processes of our Company</b></p>	<p>Conducting personnel recruitment processes</p>
<p><b>Providing the Legal, Technical and Commercial-Occupational Safety of the Persons in Business Relations with our Company and our Company itself</b></p>	<p>Tracing legal affairs</p> <p>Planning and executing the operational activities required to ensure the Company’s activities to be carried out in accordance with the Company’s procedures and relevant legislation</p> <p>Forming and tracing of visitor records</p> <p>Performing corporate law transactions</p> <p>Planning and/or conducting occupational health and/or safety activities</p> <p>Ensuring the Company’s premises and/or facilities safety</p> <p>Ensuring safety of the Company’s operations</p> <p>Planning and conducting the Company’s audit activities</p> <p>Ensuring the safety of the Company’s stocks and/or resources</p> <p>Planning and/or conducting the Company’s financial risk processes</p> <p>Providing information to the authorized institutions pursuant to the legislation</p>
<p><b>Planning and Conducting Necessary Activities for Customizing the Products and Services Offered by Our Company According to the Likes, Usage Habits and Needs of the Relevant Persons and Offering and Promoting Them to the Relevant Persons</b></p>	<p>Planning and conducting marketing processes of product and/or services</p>
<p><b>Conducting the Necessary Activities by Our Business Unit in Order to Allow Relevant Persons to Benefit from the Products and Services Offered by Our Company and Executing the Related Business Processes</b></p>	<p>Planning and conducting the sales processes of goods and/or services</p> <p>Tracing contract processes and/or legal requests</p> <p>Planning and conducting customer relations management processes</p> <p>Establishing and tracing the customer's insurance process</p> <p>Managing customer requests and/or complaints</p> <p>Planning and/or carrying out after sales support services</p> <p>Planning and/or conducting processes for establishing and/or increasing loyalty for the</p>

	product and/or services offered by the Company
<b>Planning and Conducting the Commercial and Business Strategies of our Company</b>	Managing relations with business partners and/or vendors
<b>Conducting the Necessary Activities by Our Related Business Units for Conducting the Commercial Activities Carried Out by Our Company and Conducting the Related Business Processes</b>	Management of events and activities
	Planning and/or conducting activities for realization of analysis of effectiveness/efficiency and/or appropriateness of business activities
	Planning and/or conducting the activities of business continuity
	Planning and conducting corporate communication operations
	Planning, auditing, and conducting information security processes
	Establishing and managing information technologies infrastructure
	Carrying out finance and/or accounting operations
	Planning and conducting corporate sustainability activities
	Planning and conducting logistics activities
	Planning and conducting supply chain management processes
	Planning and conducting corporate management operations

## ANNEX 2 – Data Subjects

CATEGORIES OF DATA SUBJECTS	EXPLANATION
<b>Customer</b>	Natural persons who use or have used the products and services offered by our Company regardless of whether they have any contractual relation with our Company or not
<b>Employee Candidate</b>	Natural persons who have made a job application to our Company by any means or who have submitted their CV's and related information for the review of our Company (including trainee candidates)
<b>Visitors</b>	Natural persons who have been at the premises owned by our Company for various purposes, connected to the guest internet network of our Company or visited our websites
<b>Employees, Shareholders and Authorized Persons of the Institutions We Cooperate With</b>	Natural persons including the employees, shareholders, and officials of the institutions (including, but not limited to, vendors, business partners) which our Company cooperates with
<b>Company Shareholder</b>	Natural persons who are our Company's shareholders
<b>Company Executive</b>	Natural persons who are our Company's board members and other authorized persons
<b>Third- Party</b>	Third party natural persons who are related to persons in order to ensure the security of the transaction between the parties mentioned above or to protect the rights and interests of those persons (e.g. family members and relatives) and other natural persons not covered by Otokar Otomotiv ve Savunma Sanayi Anonim Şirketi Employee Personal Data Protection and Processing Policy

### ANNEX 3 – Personal Data Categories

PERSONAL DATA CATEGORIES	EXPLANATION
<b>Identity Information</b>	It is the data that contains information about the person's identity; information such as name-surname, Turkish Republic identification number, nationality, place of birth, date of birth, gender, marital status, workplace information, registration number, tax number, title, biography and documents such as driver's license, professional identity, identity card, and passport
<b>Contact Information</b>	Telephone number, address, e-mail, fax number
<b>Family Members and Relatives Information</b>	Information on the family members and relatives of the data subjects within the framework of our Company's operations and about the products and services we offer, or to protect the legal and other interests of the Company and the data subject.
<b>Customer Transaction Information</b>	Information such as the records of our customers regarding the use of our products and services, and the instructions and demands of our customers required for the use of our products and services
<b>Physical Environment Security Information</b>	Personal data regarding the records and documents received during the stay in the physical environment, at the entrance to the physical environment; camera recordings, vehicle information records and recording at the security point, etc.
<b>Transaction Security Information</b>	Your personal data that processed to ensure our technical, administrative, legal and commercial security during the conduct of our activities (e.g. log records, IP information, authentication information)
<b>Financial Information</b>	Personal data processed for information, documents and records showing all kinds of financial results created according to the type of legal relationship established by our Company with the data subject and data such as bank account number, IBAN, income information, debit/credit information
<b>Employee Candidate Information</b>	CV information of our employees and trainee candidates who have made a job application to our Company by any means
<b>Request / Complaint Management Information</b>	Personal data regarding receiving and evaluating the requests or complaints addressed to our Company
<b>Audio-visual Records</b>	Photo and camera recordings (excluding those covered by Physical Environment Security Information) and sound recordings
<b>Legal Action and Compliance Information</b>	Personal data processed within the scope of determination and follow-up of legal receivables and rights and performance of our debts, and compliance with our Company's policies and legal obligations.
<b>Audit and Inspection Information</b>	Personal data processed for conducting our Company's operational, financial, fraud and compliance auditing activities
<b>Vehicle Information</b>	Information about the vehicles associated with the data subject
<b>Insurance Information</b>	Information related to the damage repair processes and associated with the data subject

<b>Special Categories of Personal Data</b>	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
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## ANNEX 4 - Third Parties to whom Personal Data are Transferred by our Company and the Purposes of Transfer

In accordance with Articles 8 and 9 of the Law, our Company may transfer the personal data of the data subjects managed by this Policy to the categories of persons listed below:

- (i) Business Partners
- (ii) Vendors
- (iii) Legally Authorized Public Institutions and Organizations
- (iv) Legally Authorized Private Persons
- (v) Koç Holding Anonim Şirketi
- (vi) Koç Group Companies

The scope of the abovementioned persons to whom data are transferred and purposes of data transfer are stated below.

The Persons to whom Data May be Transferred	Definition	Purpose of Data Transfer
<b>Business Partners</b>	Data controller parties with whom our Company has established a business partnership <ul style="list-style-type: none"><li>- Business partner banks to make payments</li><li>- Insurance companies and independent expertise organizations that we have partnered with within the scope of insurance operations and damage repair processes,</li><li>- Setur Servis Turistik Anonim Şirketi and other organization and event companies for the purpose of organizing events and organizations,</li><li>- Our dealers and authorized services within the scope of conducting sales and after sales support services (<i>You may find our commercial vehicle dealers and authorized services at <a href="https://commercial.otokar.com.tr/sales/dealers">https://commercial.otokar.com.tr/sales/dealers</a> <a href="https://commercial.otokar.com.tr/after-sales/after-sales-network">https://commercial.otokar.com.tr/after-sales/after-sales-network</a> websites.</i>)</li></ul>	Personal data shall be transferred limited to the purposes of ensuring the establishment of the business partnership
<b>Vendors</b>	The parties providing services to our Company in line with the data processing purposes and instructions of our Company within the scope of conducting the activities of our Company	Personal data shall be transferred limited to the purposes of ensuring provision of the services outsourced by our Company and the services required for conducting our Company's activities.
<b>Legally Authorized Public Institutions and Organizations</b>	Public institutions and organizations authorized to obtain information and documents from our Company as per the relevant legislative provisions. For example; SSI, Ministries, Tax Offices, Ministry of National Defense, CMA, etc.	Personal data shall be transferred limited to the purpose of relevant public institutions and

		organizations' request made within its legal authority.
<b>Legally Authorized Private Persons</b>	It means the institutions or organizations that have been established in accordance with certain conditions determined by law in accordance with the provisions of the relevant legislation and that continue their activities within the framework determined by the law (for example, independent auditors, mediators).	Personal data shall be transferred limited to the subjects covered by the activities carried out by the relevant private institutions and organizations.
<b>Koç Holding Anonim Şirketi</b>	Koç Holding Anonim Şirketi	Personal data shall be transferred limited to the purposes of conducting corporate communication, strategic planning, human resources, commercial and audit activities, which require the participation of Koç Group Companies.
<b>Koç Group Companies</b>	<i>(You may find the Koç Group Companies by viewing the list available at the <a href="https://www.koc.com.tr/en-us/activity-fields/list-of-koc-group-companies">https://www.koc.com.tr/en-us/activity-fields/list-of-koc-group-companies</a>)</i>	Personal data shall be transferred limited to the purposes of conducting recruitment processes within other Koç Group Companies if the data subject provide his/her explicit consent.