

Otokar Otomotiv ve Savunma Sanayi A.Ş.

Personal Data Protection Policy

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1. PURPOSE AND SCOPE

Otokar Personal Data Protection Policy (“**Policy**”), which is part of the Koç Group and Otokar Code of Ethics, aims to provide a compliance framework and coordinate compliance activities for Otokar Otomotiv ve Savunma Sanayi A.Ş. (“**Otokar**” or “**Company**”) for complying with Legislation on the protection and processing of personal data. In this context, the objective is to ensure the personal data processing activities by Otokar to be carried out in compliance with the principles of lawfulness, good faith, and transparency.

The employees and executives of Otokar are obliged to act in accordance with this Policy. Business Partners are also expected to act in accordance with the rules and principles of this Policy to the extent that they are applicable to the relevant transactions.

2. DEFINITIONS

“**Explicit Consent**” Consent related to a specific subject, based on information and expressed with a free will.

“**Anonymization**” Making personal data unrelated to an identified or identifiable natural person under any circumstances, even when by matching with the other data.

“**Data Subject**” A real person of whom personal data are processed. (customers, visitors, employees and employee candidates, etc.).

“**Business Partners**” Suppliers, vendors, authorized service companies, all kinds of representatives, subcontractors and consultancies acting on in the name of and on behalf of the company.

“**Personal Data**” Any information related with an identified or identifiable real person.

“**Processing of Personal Data**” Any activity performed on data such as obtaining personal data by fully or partially automatic means or non-automatic means that are part of a data registration system; recording, storage, retention, revision, modification, disclosure, transfer, receiving of data, rendering the data obtainable or classification or prevention of use.

“**Koç Group**” Refers to all companies controlled directly by Koç Holding A.Ş., individually or jointly and the joint ventures included in the consolidated financial report of Koç Holding A.Ş.

“**Legislation**” All of the relevant legislation in force in Turkey and relevant countries regarding the protection of personal data, especially the Law on the Protection of Personal Data No.6698.

“**Otokar**” Refers to all companies controlled directly by Otokar Otomotiv ve Savunma Sanayi A.Ş., individually or jointly and the joint ventures included in the consolidated financial report of Otokar.

“**Special Categories of Personal Data**” Race, ethnic origin, political view, philosophical belief, religion, religious sect or other beliefs, clothing style, association, foundation or union membership, health, sexual life, criminal convictions, and security measures as well as biometric and genetic data are special categories of personal data.

“**VERBİS**” Data Controllers Registry Information System

“**Data Processor**” A real or legal person that processes personal data for and on behalf of the data controller based on the authorization granted by the data controller.

“**Data Controller**” A real or legal person who determines the objectives and means of personal data processing and is responsible for the establishment and management of the data recording system.

3. GENERAL PRINCIPLES

Breach of this Policy may result in significant consequences for Otokar, their associated executives and employees including legal, administrative, and criminal penalties based on the Legislation in the region of operation, and, most significantly, the breach may result in serious harm to the reputation of Otokar.

One of the most important issues for Otokar is to act in accordance with the Legislation and the general principles set out in the Legislation with regards to processing of personal data. In this regard, Otokar follows the guidelines outlined below when processing personal data in compliance with the Legislation.

Otokar carries out the personal data processing practices within the scope of its activities in accordance with the Otokar Otomotiv ve Savunma Sanayi A.Ş. Personal Data Protection and Processing Policy¹.

3.1. Processing of personal data in accordance with the law and principle of good faith

The general rule of trust and good faith in compliance with the Legislation must be adhered to on the subject of personal data processing. In this context, personal data should be processed in accordance with general principles of law, good-will and general morality to the extent required by business activities and limited to the these activities.

3.2. Ensuring that personal data is accurate and up-to-date when required

Systems must be established, and necessary measures must be taken to ensure that the personal data being processed are accurate and up-to-date while taking account of data subjects’ rights.

3.3. Processing of personal data for specific, explicit and legitimate purposes

Personal data must be processed for legitimate and lawful purposes. Otokar must only process personal data in connection with their activities and to the extent necessary. Prior to personal data processing operations, the purposes for processing personal data should be determined.

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

Personal data must be processed adequately for carrying out the determined purposes and processing of personal data that is not necessary for fulfilling the purposes must be avoided.

3.5. Storing for the Period Stipulated in the Relevant Legislation or the Period Required for the Processing Purpose

Personal data must only be stored for the period stipulated in the relevant Legislation or for the period required for the personal data processing purpose.

In this regard, firstly determination must be made whether a certain period is stipulated for the storage of personal data in the relevant Legislation, if any period is determined, this period should be complied with. If no period is determined, personal data must be stored for the period required for carrying out the purpose of the processing. Personal data must be erased, destructed, or anonymized in case the period expires or

¹ Detailed information may be found via <https://www.otokar.com.tr/getmedia/3ba694d2-9505-4da0-bc6f-038963682768/personal-data-protection-policy> .

the reason for its processing no longer exists. Personal data must not be stored based on the possibility of future use.

4. APPLICATION OF THE POLICY

4.1. Processing Personal Data Based on the Data Processing Conditions

4.1.1. Execution of Personal Data Processing Activities Based on the Personal Data Processing Conditions Specified in the Legislation

As a rule, personal data must be processed based on at least one of the conditions specified in the Legislation. Determination should be made on whether the personal data processing activities carried out by the Otokar's business units are based on at least one of the conditions. Personal data processing activities that do not meet this requirement should not be included in the processes.

4.1.2. Execution of Special Categories of Personal Data Processing Activities Based on Special Categories of Personal Data Processing Conditions Stipulated in the Legislation

As a rule, special categories of personal data must be processed based on the conditions specified in the Legislation. It must be ensured that the special categories of personal data processing activities carried out by the Otokar's business units are in line with these conditions, the necessary technical and administrative measures for the processing of the special categories of personal data must be taken 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.

Processing of special categories of personal data must be carried out in accordance with the provisions set out in the Legislation regarding the processing of special categories of personal data and transfer of data to domestic third parties and abroad. In addition to the above-mentioned matters, in these cases, personal data processing activities must also be carried out by fulfilling the special requirements set forth in the Legislation.

4.2. Requirements to be Complied with for Transfer of Personal Data

Personal data of data subjects should be transferred to third parties in accordance with the purposes and legal basis for personal data processing and by taking the necessary security measures. In this regard, necessary processes for acting in accordance with the conditions stipulated in the Legislation must be designed.

4.3. Obligations Related To The Protection And Processing Of Personal Data

4.3.1. Obligation to Register with VERBİS

Otokar must register with VERBİS as Data Controllers if they are under the obligation to register according to the criteria stipulated in the Legislation. In case of a revision in the registered information, the information in VERBİS must be updated within 7 (seven) days from the date of revision.

Koç Holding Legal and Compliance Department must be given a report and Otokar Legal and Compliance Department must be informed twice a year, every 6 (six) month periods (June-December) regarding the updates made by Otokar in VERBİS.

4.3.2. Obligation to Inform Data Subjects

Data subjects must be informed at the time of collection of personal data in accordance with the Legislation.

In this regard, the personal data collection channels must be determined for the fulfillment of the obligation to inform; data subjects must be informed through the privacy notices which comply with the scope and conditions specific to these collection activities required in the Legislation; the appropriate processes should be designed accordingly by the Otokar.

Otokar must keep the personal data collection channels up to date as a list and share the list with the Otokar Legal and Compliance Department and the Koç Holding Legal and Compliance Department twice a year, every 6 (six) month periods (June-December).

4.3.3. Obligation to Ensure the Security of Personal Data

Along with the awareness on the importance of ensuring data security in all aspects within the Otokar, necessary and adequate technical and administrative measures must be taken to prevent unlawful processing of personal data or access to data, and to store data in accordance with the Legislation and in this regard necessary audits must be conducted by the Company and/or have audits conducted by a third party.

Within the scope of the measures taken by the Company, trainings regarding the Legislation are given to the employees by the Otokar Legal and Compliance Department. The company must provide information to the Koç Holding Legal and Compliance Department regarding the trainings carried out in this context.

4.3.4. Audit of the Measures Taken for the Protection of Personal Data

Systems for conducting and having the necessary audits regarding the functioning of the measures taken in terms of technical and administrative measures must be built. These audit results must be reported to the Otokar Legal and Compliance Department and the necessary actions must be taken to improve the measures taken. In addition, the annual audit report and the measures taken by the Company must be shared with Koç Holding Legal and Compliance Department.

4.3.5. Measures to be Taken in Case of Unauthorized Disclosure of Personal Data

The data subject and the relevant authorities must be informed as soon as possible in compliance with the Legislation and Data Breach Management and Response Plan Policy in case the processed personal data is illegally obtained by third parties. Additionally, in such cases, Koç Holding Legal and Compliance Department must be informed immediately.

4.3.6. Obligation to Inform the Data Subject

The data subjects have the right to request information about their processed personal data by applying data controllers whenever they need.

In this context, Otokar Data Subject Application Management Procedure is implemented within the Company in the matters of designing the necessary application channels in accordance with the Legislation, evaluating the applications, answering the applications within the periods stipulated in the Legislation in order to evaluate the rights of the data subjects and to provide the necessary information to the data subjects.

In the case that the data subjects submit their requests regarding their rights to the Otokar, the relevant request must be responded as soon as possible and within 30 (thirty) days at the latest.

While concluding the relevant application of the data subject, information shall be provided with a wording and format easily understandable to the data subject. Necessary warnings should be given within the Company and awareness must be ensured that data subjects have a right to complain to the relevant authority in the case that the data subject's application is rejected, the response is insufficient, or the application is not responded within the stipulated timeframe.

Data subject applications and the response processes should be kept as a list by the Otokar and must be shared with Otokar Legal and Compliance Department and the Koç Holding Legal and Compliance Department twice a year at 6 (six) month periods (June-December). In addition, the opinions of the Otokar Legal and Compliance Department and of the Koç Holding Legal and Compliance Department must be taken before any action is taken regarding all kinds of information and document requests from the relevant authorities to the Company and all kinds of applications to be made by the Company to these authorities.

5. AUTHORITY AND RESPONSIBILITIES

All Otokar employees and directors are responsible to comply with this Policy. Otokar expects its Business Partners to comply with this Policy to the extent applicable to the relevant party and operation and takes necessary steps for this.

Otokar Legal and Compliance Department is the responsible body for the implementation of this Policy.

In case of being aware of any action considered to be contrary to this Policy, the Legislation in force or Koç Group and Otokar Code of Ethics, you may contact the Otokar Legal and Compliance Department or the Koç Holding Legal and Compliance Department.

Please contact the departments listed above for your queries or concerns. As an alternative method, you can make all your notifications about ethical violations by selecting the Denouncement/Notice of Malfeasance on the “otokar.com.tr/contact/contact-form” or via “koc.com.tr/hotline”.

Breach this Policy might result in significant disciplinary penalties including dismissal. In the case of breach of this Policy by third parties, the legal relationship between those parties and the Otokar might be terminated immediately.

6. REVISION HISTORY

This Policy being effective from the date of 24/03/2026 and Otokar Legal and Compliance Department is responsible for the execution of the Policy.

Revision	Date	Comment
Special Categories of Personal Data Processing Activities have been updated in accordance with the applicable legislation		