

**BORUSAN GROUP PERSONAL DATA PROTECTION AND PROCESSING POLICY**  
30.10.2025

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## 1. INTRODUCTION

As Borusan Holding A.Ş. and/or its group companies ("**Borusan Group**"), in line with the Personal Data Protection Law No. 6698 ("Law") and secondary regulations regarding the protection of Personal Data, it is our priority to carry out all our Personal Data Processing activities in accordance with the applicable legislation and to ensure that the Personal Data we obtain is protected appropriately.

## 2. PURPOSE

This Policy contains general statements covering all Personal Data Processing activities carried out by the Borusan Group within the scope of the Law and all Data Subjects whose Personal Data is processed. This Policy has been prepared with the aim of ensuring the highest level of management and coordination of compliance activities to be carried out by the Borusan Group in order to comply with the Law regarding the Processing and protection of Personal Data. Each Borusan Group company shall make the necessary arrangements with regards to its' internal operations to comply with this Policy in line with the principles set forth herein and shall establish the necessary system to raise awareness among its Employees and business partners.

## 3. DEFINITIONS

The terms in the Policy and their explanations are listed below. Definitions not specified in this Policy shall be understood as defined in the Law and secondary regulations.

**Automated Data Processing:** Processing activities performed by devices equipped with processors, such as computers, phones, watches, etc., which occur automatically without human intervention through pre-programmed algorithms using software or hardware features.

**Board:** The Personal Data Protection Board.

**Data Recording System:** A recording system in which Personal Data is processed according to specific criteria.

**Data Subject:** The natural person(s) whose personal data is processed.

**Employee:** Borusan Group employees, subcontractor employees, and interns.

**Explicit Consent:** Consent that is freely given, specific and informed consent.

**Law:** The Personal Data Protection Law No. 6698

**Personal Data:** Any information relating to an identified or identifiable natural person.

**Processing of Personal Data:** Any operation which is performed on Personal Data, wholly or partially by automated means (see "Automated Data Processing") or non-automated means which provided that form part of a data filing system, such as collection, recording, storage, protection, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization, preventing the use thereof.

**Special Categories of Personal Data:** 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.

#### **4. PRINCIPLES APPLICABLE TO THE PROCESSING OF PERSONAL DATA**

Borusan Group processes Personal Data in accordance with the general principles and provisions stipulated in the legislation to ensure compliance with the Law. In this regard, the principles and conditions that should be considered in all Personal Data Processing activities carried out by Borusan Group are as follows:

##### **4.1. Processing Personal Data in Compliance with the Law and Good Faith Principle**

Borusan Group acts in compliance with the law and the good faith principle in its Personal Data Processing activities. In this regard, Borusan Group applies the principles of proportionality and necessity in the processing of Personal Data, placing importance on processing only as much Personal Data as is necessary and at a level appropriate to the purposes of data processing.

##### **4.2. Ensuring Personal Data is Accurate and Updated Where It's Necessary**

Borusan Group pays attention to the accuracy and currency of the Personal Data it processes and takes the necessary measures in this regard. Borusan Group develops systems that enable Data Subjects to correct and update their Personal Data.

##### **4.3. Processing for Specified, Explicit and Legitimate Purposes**

Borusan Group processes Personal Data for specified, explicit and legitimate purposes. In this regard, Borusan Group determines legitimate and lawful purposes for the Processing of Personal Data, pays attention not to process Personal Data for purposes other than those specified, and informs the Data Subjects of these purposes before Processing Personal Data.

##### **4.4. Processing That is Relevant, Limited and Proportionate to the Purposes for Processing**

Borusan Group processes Personal Data in a manner suitable for achieving the specified purposes and avoids processing Personal Data that is not related to or necessary for achieving the purpose. Borusan Group does not process Personal Data for the purpose of achieving a new purpose that arises after the Personal Data is obtained.

##### **4.5. Retaining Personal Data for the Period Required by Applicable Legislation or Necessary for the Purpose of Processing**

Borusan Group retains Personal Data only for the period specified by law or limited to the purpose for which it is processed. In this regard, if a period for the storage of Personal Data is specified in the relevant legislation, Borusan Group acts in accordance with this period. If no period is specified, Personal Data is retained for as long as necessary for the purpose for which it is processed.

#### **5. CONDITIONS FOR PROCESSING PERSONAL DATA**

As a rule, Personal Data is processed based on one or more of the Personal Data Processing conditions specified in Articles 5 and 6 of the Law. In this regard, Borusan Group evaluates whether its' Personal Data Processing activities fall within the scope of one of these conditions and discontinues any Personal Data Processing activities that do not rely on one of these conditions. These conditions are listed below.

### 5.1. Processing of Personal Data

The conditions relied upon by Borusan Group when processing Personal Data and set forth in Article 5 of the Law are as follows;

- The explicit consent of the Data Subject,
- Explicitly stipulated by laws,
- If the processing of Personal Data is necessary to protect the life or physical integrity of the Data Subject or another person, and the Data Subject is unable to express their consent due to actual impossibility or their consent is not legally valid,
- The processing of Personal Data belonging to the parties to a contract is necessary, provided that it is directly related to the establishment or performance of the contract,
- Processing for the establishment, exercise, or protection of a right,
- Processing of Personal Data is necessary for Borusan Group to fulfill its legal obligations,
- Personal Data has been made public by the Data Subject,
- Processing of data is necessary for the legitimate interests of Borusan Group, provided that it does not harm the fundamental rights and freedoms of the Data Subject.

The condition of “the existence of the Data Subject's explicit consent” among the above-mentioned conditions for Personal Data Processing is only relied upon if none of the other data processing conditions listed in the other articles apply. For example, if the processing of Personal Data is based on the data processing condition that “it is necessary to process the Personal Data belonging to the parties to the contract, provided that it is directly related to the establishment or performance of a contract,” the Borusan Group does not rely on the explicit consent of the Data Subjects to process the Personal Data in question.

### 5.2. Processing of Special Categories of Personal Data

While Article 5 of the Law stipulates the conditions for the Processing of Personal Data, Article 6 of the Law stipulates the conditions for the Processing of Special Categories of Personal Data. Special Categories of Personal Data is specified in the Law in accordance with the principle of limited enumeration. Due to the sensitivity of Special Categories of Personal Data, the conditions for data processing also differ from those for Personal Data.

The Borusan Group implements its policy and Special Categories of Personal Data processing procedures regarding the processing of Special Categories of Personal Data, which have been established by taking into account the adequate measures determined by the Board, within the framework of this policy.

Borusan Group processes Special Categories of Personal Data if at least one of the following data processing conditions specified in Article 6 of the Law is met:

- The explicit consent of the Data Subject,
- Explicitly stipulated by laws,
- Where it is necessary to protect the life or physical integrity of the Data Subject or another person, where the Data Subject is unable to express consent due to actual impossibility or where consent is not legally valid,
- Personal Data made public by the Data Subject, provided that the processing is in accordance with the Data Subject's intention to make it public,
- It is necessary for the establishment, exercise, or protection of a right,
- It is necessary for the protection of public health, the provision of preventive medicine, medical diagnosis, treatment, and care services, and the planning, management, and financing of health services by persons or authorized institutions and organizations subject to confidentiality obligations,

- It is necessary for the fulfillment of legal obligations in the areas of employment, occupational health and safety, social security, social services, and social assistance,
- It relates to the current or former members and affiliates of foundations, associations, and other non-profit organizations established for political, philosophical, religious, or trade union purposes, or to individuals who are in regular contact with these organizations, provided that such processing complies with the applicable legislation governing these organizations and their objectives, is limited to the organizations' fields of activity, and does not involve disclosure of data to third parties.

### **5.3. Transfer of Personal Data**

Borusan Group may transfer Personal Data obtained for the purposes of Personal Data Processing to third parties. Data transfers carried out by Borusan Group vary depending on each Personal Data Processing activity. Within the scope of its disclosure obligation, Borusan Group discloses to Data Subjects, in accordance with disclosure texts, to which third parties Personal Data will be transferred for each Personal Data Processing activity.

When transferring Personal Data to third parties, Borusan Group attaches great importance to complying with the rules set forth in Articles 8 and 9 of the Law and the additional regulations determined by the Board. It transfers Personal Data by taking the necessary security measures appropriate to the nature of the Personal Data during the transfer processes.

Personal Data obtained by the Borusan Group may be transferred to third parties when the transfer of Personal Data is necessary to fulfill the purpose of data processing and when the following data processing conditions are met:

- The explicit consent of the Data Subject,
- Explicitly stipulated by laws,
- If the processing of Personal Data is necessary to protect the life or physical integrity of the Data Subject or another person, and the Data Subject is unable to express their consent due to actual impossibility or their consent is not legally valid,
- The processing of Personal Data belonging to the parties to a contract is necessary, provided that it is directly related to the establishment or performance of the contract,
- Processing for the establishment, exercise, or protection of a right,
- Processing of Personal Data is necessary for Borusan Group to fulfill its legal obligations,
- Personal Data has been made public by the Data Subject,
- Processing of data is necessary for the legitimate interests of Borusan Group, provided that it does not harm the fundamental rights and freedoms of the Data Subject.

The condition of "the explicit consent of the Data Subject" mentioned above is only relied upon if none of the other transfer conditions listed in the other articles apply. If one of the conditions other than the explicit consent of Data Subject applies, the transfer is carried out based on that condition.

In the transfer processes of Special Categories of Personal Data, if one of the transfer conditions for Special Categories of Personal Data exists, the data may be transferred by taking into account the relevant data transfer condition. Otherwise, the Data Subject's Explicit Consent is sought for the transfer.

In order to carry out Borusan Group activities in the most efficient manner and to benefit from the possibilities offered by technology, we transfer your Personal Data abroad via information technology, by taking the necessary technical and administrative measures.

## 6. OBLIGATION TO INFORM DATA SUBJECTS AND THEIR RIGHTS

### 6.1. Obligation to Inform Data Subjects

Borusan Group informs Data Subjects whom data will be processed on how their data will be processed. In this regard, Personal Data collection channels are first identified, and disclosure texts are provided for each channel in each process where Personal Data Processing activities occur.

If Personal Data is not obtained directly from the Data Subject, Borusan Group carries out activities related to informing the Data Subjects (1) within a reasonable period of time after obtaining the Personal Data, (2) if the Personal Data will be used for communication purposes with the Data Subject, at the time of the first communication, (3) if the Personal Data will be transferred, at the time of the first transfer of the Personal Data at the latest.

### 6.2. Obligation to Respond to Data Subject' Requests

Data Subjects may exercise their rights regarding their data as set forth in Article 11 of the Law:

- To learn whether their Personal Data has been processed,
- To request information regarding the processing of their Personal Data,
- To learn the purpose of processing their Personal Data and whether it is being used for its intended purpose,
- To know the third parties to whom their Personal Data has been transferred within or outside the country,
- To request the correction of their Personal Data if it has been processed incompletely or incorrectly, and to request that the third parties to whom their Personal Data has been transferred be notified of this action,
- To request the deletion or destruction of Personal Data when the reasons for processing no longer exist, even if the processing was carried out in accordance with the provisions of the Law and other relevant legislation, and to request that the third parties to whom the Personal Data has been transferred be notified of this action,
- To object to the occurrence of a result against the person himself/herself by analyzing the data processed solely through automated systems,
- To claim compensation for the damage arising from the unlawful processing of his/her Personal Data.

Data Subjects may choose the following methods to exercise their rights,

- By sending their requests to the email address [holdingkvkk@borusan.com](mailto:holdingkvkk@borusan.com) by using the email address they previously provided and which is registered in our system,
- Submitting requests by mail to the address: Pürtelaş Hasan Efendi Mahallesi Meclis-i Mebusan Caddesi No.35 İç Kapı No. 3 Beyoğlu, İstanbul,
- Data Subjects may also choose other methods specified in the [Communiqué on the Procedures and Principles for Applying to the Data Controller](#) to submit their requests.

Borusan Group will respond to the relevant request free of charge as soon as possible and within thirty days at the latest, depending on the nature of the request; however, if the process incurs additional costs, a fee may be charged to the Data Subject in accordance with the tariff determined by the Board.

Borusan Group determines whether the person making the request is the actual right holder during the evaluation of requests. As a result of the evaluation, it may accept the requests and take the necessary actions, or it may reject the requests with justification.

## **7. THE DESTRUCTION OF PERSONAL DATA**

Even if processed in accordance with applicable legislation, Borusan Group deletes, destroys, or anonymizes the relevant Personal Data at its own initiative and/or upon request from the Data Subject when the reasons for processing the Personal Data no longer exist.

The Personal Data Retention and Destruction Policy has been prepared within this scope. In cases where Borusan Group has the right and/or obligation to retain Personal Data in accordance with the provisions of the relevant legislation, the right not to accommodate the Data Subject's request is reserved. When Personal Data is processed by non-automated means as part of a Data Recording System, the system ensures that the data is physically destroyed in such a way that it cannot be used again when the Personal Data is deleted/destroyed. When Borusan Group contracts with a person or organization to process Personal Data on its behalf, the Personal Data is securely deleted by such person or organization in a manner that cannot be recovered. Borusan Group may anonymize Personal Data when the reasons requiring the processing of Personal Data in accordance with the law cease to exist.

## **8. ENFORCEMENT AND AMENDMENTS**

This Policy has been prepared by Borusan Holding Legal and Compliance Department, reviewed by the Borusan Holding KVKK Committee, and approved by the Borusan Holding Ethics and Compliance Board, and entered into force on 30.10.2025.

This Policy shall be reviewed by Borusan Holding Legal and Compliance Department if necessary or once a year at latest, and any changes shall be approved by Borusan Holding Ethics and Compliance Board.

This Policy has been prepared and entered into force in accordance with the applicable legislation, including the Law. While the Borusan Group will make every effort to update this Policy in line with any changes in the applicable legislation, in the event of a conflict between the applicable legislation and the provisions of this Policy due to such changes, the provisions of the applicable legislation shall prevail.

The current Policy text can be accessed at [www.borusan.com](http://www.borusan.com) or via the Borusan Human Resources portal.