

	<b>BİLGİ GÜVENLİĞİ</b>	<b>Doküman No</b>	<b>PL. KVKK.001</b>
		<b>Yayın Tarihi</b>	<b>01.01.2025</b>
	<b>KİŞİSEL VERİLERİN İŞLENMESİ VE KORUNMASI POLİTİKASI</b>	<b>Rev. No</b>	<b>001</b>
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		<b>Sayfa No</b>	<b>Sayfa 1 / 6</b>

## PERSONAL DATA PROCESSING AND PROTECTION POLICY

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### 1. INTRODUCTION, SCOPE AND DEFINITIONS

The Law on the Protection of Personal Data No. 6698 (“KVK Law”) entered into force upon its publication in the Official Gazette dated 07.04.2016, regulating the protection of individuals’ personal data through a comprehensive legal framework.

Within this context, the Personal Data Protection and Processing Policy (“Policy”) serves as a guiding document that explains how Atlas Trafo A.Ş. (“Company/Our Company”) will concretely implement the rules set forth by the KVK Law and relevant legislation.

Our Company carries out the necessary internal arrangements to ensure compliance with the Policy and operates periodic internal audit mechanisms to maintain continuous alignment with the Policy.

#### Scope:

This Policy applies to all personal data processed by our Company, whether through automated means or non-automated means that form part of a data recording system, belonging to:

Employees, Former Employees, Employee Candidates, Interns, Community Workers, Employee Relatives, Company Shareholders/Partners, Company Officials, Persons Receiving Products or Services (Customers), Potential Customers, Visitors, Supplier Officials, Supplier Employees — as defined in Article 1.3.

#### Definitions:

Definitions in the KVK Law and secondary legislation are not repeated here; unless otherwise stated in this Policy, they are used as defined in relevant legislation.

### 2. CATEGORIES OF DATA SUBJECTS

#### Employee:

Real persons who have an employment relationship with our Company under an employment contract.

#### Employee Candidate:

Persons who apply for a job with our Company in any manner or who share their CVs and related information with us.

#### Intern:

Persons working within our Company to gain experience, learn business operations, and develop

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professional skills.

Former Employee:

Persons whose employment relationship with our Company has ended for any reason.

Shareholder/Partner:

Real persons who are shareholders or partners of the Company.

Company Officials:

Board members and other authorized real persons.

Supplier Employee:

Employees of suppliers, business partners or third parties providing services to our Company either contractually or without a contractual relationship.

Supplier Official:

Board members, general managers or other authorized real persons of suppliers or business partners conducting commercial activities with our Company.

Customer:

Real persons whose personal data is obtained during business operations, regardless of whether a contractual relationship exists.

Potential Customer:

Persons to whom our Company's products and services are promoted or marketed.

Visitor:

Real persons entering our Company's physical premises or visiting our websites.

### 3. PRINCIPLES FOR PROCESSING PERSONAL DATA

Our Company processes personal data in compliance with the KVK Law and secondary regulations based on the following principles:

Lawfulness and Fairness:

Processing activities are carried out lawfully, fairly, and in line with the principles set forth by the Constitution and data protection legislation.

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Accuracy and Up-to-Date Processing:

Personal data are kept accurate and up-to-date, taking into account the rights of data subjects and the legitimate interests of our Company.

Specific, Explicit and Legitimate Purpose:

Processing purposes are clearly determined, legitimate, and related to our commercial activities.

Data Minimization (Relevant, Limited and Proportionate):

Data are processed only to the extent necessary to achieve the defined purposes and unnecessary data are not processed.

Storage Limitation:

Personal data are retained only for the period required by legislation or the processing purpose. Once the period expires or the purpose no longer exists, data are deleted, destroyed or anonymized.

#### 4. CONDITIONS FOR PROCESSING PERSONAL DATA

Except where explicit consent is required, our Company processes personal data in accordance with one or more conditions listed in Article 5 of the KVK Law.

Explicit Consent:

Consent must be specific, informed and freely given.

Clearly Provided for by Law

Inability to Obtain Consent (Vital Interests)

Performance of a Contract

Legal Obligation of the Company

Data Made Public by the Data Subject

Establishment, Exercise or Protection of a Right

Legitimate Interests of the Company

(Provided that fundamental rights and freedoms are not harmed.)

#### 5. TRANSFER OF PERSONAL DATA

Our Company may transfer personal data domestically, provided appropriate security measures and confidentiality conditions are ensured:

Legally Authorized Institutions and Organizations – limited to their legal authority

Company Shareholders/Partners – for business continuity and audit purposes

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Suppliers – limited to services required for our Company’s commercial activities

Authorized Private Institutions – such as banks, independent auditors, and benefit providers

## 6. PROCESSING AND TRANSFER OF SPECIAL CATEGORIES OF PERSONAL DATA

Special categories of data are processed with great sensitivity and only under the following conditions:  
Non-health special categories: processed without consent if clearly provided for by law; otherwise explicit consent is required.

Health and sexual life data: may be processed without consent by persons/institutions under confidentiality obligation for purposes such as public health, protective medicine, diagnosis, treatment, care, and health service management.

## 7. DATA CATEGORIES AND PURPOSES OF PROCESSING

Data subjects are informed in accordance with Article 10 of the KVK Law about:  
identity of the controller, processing purposes, transfers, method/legal basis, and their rights.

Detailed categories are listed in Annex-1 (Personal Data Categories); purposes in Annex-2 (Purposes of Processing).

Processing is carried out based on at least one legal ground under Article 5 and within the retention periods defined in our Personal Data Retention and Disposal Policy.

## 8. SPECIAL PROCESSING SITUATIONS

### CCTV Monitoring

Cameras are used for security purposes. Data subjects are informed through posted notices.

### Internet Access Logs for Visitors

Internet logs are recorded under Law No. 5651 and accessed only by authorized persons and only for legal or audit purposes.

## 9. MEASURES FOR THE PROTECTION OF PERSONAL DATA

### Technical Measures:

Our Company takes necessary technical measures to prevent unlawful access, ensure secure storage, and protect personal data.

### Administrative Measures:

A Personal Data Protection Committee is established.

Confidentiality agreements and internal policies are enforced.

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Awareness programs, instructions, procedures and audits are carried out.

Annual internal and external audits ensure compliance.

Protection of Special Categories of Data

Enhanced measures are applied for special categories defined by law.

## 10. DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

When the purpose or legal basis for processing no longer exists, data are deleted, destroyed, or anonymized in accordance with the Personal Data Retention and Disposal Policy and the guidelines of the Authority.

## 11. RIGHTS OF THE DATA SUBJECT

Data subjects have the following rights under Article 11:

To learn whether their personal data are processed

To request information

To learn processing purposes and whether used accordingly

To know domestic/foreign third parties to whom data are transferred

To request rectification

To request deletion/destruction

To object to decisions based solely on automated processing

To claim compensation for unlawful processing

## 12. EXERCISING DATA SUBJECT RIGHTS

Requests must be submitted through the application form provided at:

<https://www.atlastrafo.com/tr/KVKKBasvuru>

## 13. COMPANY RESPONSE TO APPLICATIONS

Our Company responds within 30 days free of charge, unless the process entails a cost — in such cases, fees may be charged as per tariff.

## DATA CONTROLLER INFORMATION

Atlas Trafo A.Ş.

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