GAZİ METAL SAN. VE TİC. A.Ş.
POLICY ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

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1. CHAPTER 1 – INTRODUCTION
1.1 Introduction 2
1.2 Scope 2
1.3 Implementation of the Policy and Relevant Legislation 2
1.4 Effectiveness of the policy 2

2. CHAPTER - ENSURİNG THE SECURİTY OF PERSONAL DATA
2.1. Ensuring the Security of Personal Data 2
2.2. Protection of Sensitive Personal Data 2
2.3. Raising Awareness and Monitoring Business Units' Compliance with Data Protection and Processing Regulations 3

3. CHAPTER 3 – MATTERS RELATING TO THE PROCESSING OF PERSONAL DATA 3
3.1. The Processing of Personal Data in Accordance with the Principles Set Out in the Legislation 3
3.2. Conditions for the Processing of Personal Data 4
3.3. Processing of Sensitive Personal Data 5
3.4. Informing the Personal Data Subject 5
3.5. Processing of Personal Data by the Company 5
3.6. Transferring Personal Data 5

4. CHAPTER 4 – CATEGORISATION OF PERSONAL DATA PROCESSED BY OUR COMPANY AND THE PURPOSES OF PROCESSING 6

5. CHAPTER 5 – STORAGE AND DISPOSAL OF PERSONAL DATA 6

6. CHAPTER 6 – THE RIGHTS OF DATA SUBJECTS AND THE EXERCISING OF THESE RIGHTS 6
6.1. Rights of Data Subjects 6
6.2. Exercising of the Data Subject's Rights 7
6.3. Replying to Enquiries by our Company 7

7. CHAPTER 7 – SPECIFIC CIRCUMSTANCES IN WHICH PERSONAL DATA IS PROCESSED 7
7.1. Personal data processing activities carried out at building and facility entrances and within the premises, and website visitors 7
7.2. CCTV Surveillance Operations Carried Out at the Entrances to and Inside Buildings and Premises of Gazi Metal A.Ş 7
7.3. Monitoring of Visitor Entries and Exits at Building and Facility Entrances and Inside the Premises of Gazi Metal A.Ş 7

1. CHAPTER 1 – INTRODUCTION

1.1 Introduction

The protection of personal data is one of Gazi Metal Anonim Şirketi's (**"Gazi Metal"**or**"the Company**") top priorities, and it endeavours to comply with all applicable legislation in this regard. Within the framework of this Policy on the Protection and Processing of Personal Data (**"Policy"**), Gazi Metal Anonim Şirketi, the principles adopted in the conduct of personal data processing activities carried out by our Company, as well as the fundamental principles adopted to ensure compliance with the provisions of the Law on the Protection of Personal Data No. 6698 (**"the Act"**) are set forth and in doing so, our Company ensures the necessary transparency by informing data subjects. Fully aware of our responsibilities in this regard, your personal data is processed and protected in accordance with this Policy.

1.2 Scope

This Policy applies relates to all personal data of our customers, prospective customers, job applicants, company shareholders, company officers, visitors, and the employees, shareholders and officers of organisations with which we collaborate, as well as third parties, whether processed by automated means or by non-automated means provided that such processing forms part of a data filing system.

1.3 Implementation of the Policy and Relevant Legislation

The relevant legal provisions currently in force regarding the processing and protection of personal data shall take precedence. In the event of any inconsistency between the legislation in force and this Policy, our Company accepts that the legislation in force shall prevail. This policy sets out the rules laid down by the relevant legislation, as implemented within the framework of Gazi Metal A.Ş.'s practices.

1.4 Effectiveness of the policy

This Policy came into force on 18 December 2019 and is updated in line with changes to legislation and internal company processes.

This Policy is available on Gazi Metal's website http://www.gazimetal.com.tr/kurumsal/yasal-uyari/ and is made available to data subjects upon their request.

2. CHAPTER 2 – MATTERS RELATING TO THE PROTECTION OF PERSONAL DATA

2.1. Ensuring the Security of Personal Data

In accordance with Article 12 of the Law and in line with the guidelines published by the Personal Data Protection Authority, our Company takes the necessary administrative and technical measures, depending on the nature of the data being protected, to prevent the unlawful processing, disclosure, access, transfer or any other security breaches that may arise.

2.2. Protection of Sensitive Personal Data

The Law attaches particular importance to certain categories of personal data due to the risk that their unlawful processing may cause harm to individuals or lead to discrimination. This data includes: race, ethnic origin, political opinions, philosophical beliefs, religion, denomination or other beliefs, dress and appearance, membership of an association, foundation or trade union, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data.

Gazi Metal takes great care to protect personal data designated as 'sensitive' under the Law. In this context, Gazi Metal ensures full compliance with the Board's decisions and legislation regarding the adequate measures

to be taken by data controllers when processing special category personal data; the necessary technical and organisational measures are carefully implemented, and the requisite audits are carried out within the Company. Detailed information regarding the processing of sensitive personal data is set out in section 3.3 of this Policy.

Detailed information regarding the processing of sensitive personal data is set out in section 3.3. (*"Processing of Sensitive Personal Data"*) of this Policy.

2.3. Raising Awareness and Monitoring Business Units' Compliance with Data Protection and Processing Regulations

Gazi Metal A.Ş ensures that the necessary training is provided to its business units to raise awareness with a view to preventing the unlawful processing of personal data, unlawful access to personal data, and to ensure the protection of personal data.

Gazi Metal A.Ş. is establishing the necessary systems to raise awareness amongst its employees regarding the protection of personal data and works with consultants on this matter where required. In this regard, our Company assesses participation in relevant training courses, seminars and information sessions, and updates and revises its training programmes in line with updates to the relevant legislation.

3. CHAPTER 3 – MATTERS RELATING TO THE PROCESSING OF PERSONAL DATA

3.1. The Processing of Personal Data in Accordance with the Principles Set Out in the Legislation

3.1.1. Processing in accordance with the law and the principle of fairness

Gazi Metal A.Ş. acts in accordance with the principles laid down by legal regulations governing the processing of personal data, as well as the general principles of good faith and fairness. In this context, personal data is processed to the extent required by our Company's business activities and is limited to such activities.

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

Gazi Metal A.Ş. takes the necessary measures to ensure that personal data remains accurate and up to date throughout the period during which it is processed, and establishes the necessary mechanisms at regular intervals to ensure the accuracy and actuality of personal data.

3.1.3. Processing for specific, explicit and legitimate purposes,

Gazi Metal A.Ş. clearly sets out the purposes for which personal data is processed and processes such data in accordance with its business activities and for purposes related to those activities.

3.1.4. Being relevant, limited and proportionate to the purpose for which they are processed,

Gazi Metal collects personal data only to the extent and in the manner required by its business activities, and processes such data solely for the specified purposes.

3.1.5.Retention for the period stipulated in the relevant legislation or required for the purpose for which they are processed.

Gazi Metal retains personal data for as long as is necessary for the purpose for which it is processed and for the minimum period stipulated in the relevant legislation governing the activity in question. In this context, our Company first determines whether the relevant legislation specifies a retention period for personal data; if such a period has been specified, it acts in accordance with that period. If there is no statutory retention period, personal data is retained for as long as is necessary for the purpose for which it is processed. Personal data is destroyed at the end of the specified retention periods, in accordance with the periodic destruction

schedules or at the request of the data subject, using the specified destruction methods (deletion and/or destruction and/or anonymisation).

3.2. Conditions for the Processing of Personal Data

Apart from the data subject giving their explicit consent, the legal basis for the processing of personal data may be any one of the conditions set out below; alternatively, more than one condition may form the legal basis for the same processing activity. Where the data processed constitutes sensitive personal data, the conditions set out in Section 3.3 of this Policy (*"Processing of Sensitive Personal Data*") shall apply.

3.2.1. Explicit Consent of the Personal Data Subject

The primary condition for processing personal data is the explicit consent of the data subject. The explicit consent of the personal data subject must be related to a specific subject, based on information and with free will.

Where the conditions for the processing of personal data set out below are met, personal data may be processed without the data subject's explicit consent.

3.2.2. Explicitly stipulated in the Laws

The data subject's personal data may be processed if this is expressly provided for by law; in other words, this condition for data processing will apply where there is an explicit provision in the relevant legislation concerning the processing of personal data.

3.2.3. Failure to Obtain the Data Subject's Explicit Consent Due to Practical Impossibility

Where a data subject is unable to give their consent due to actual impossibility, or where their consent cannot be deemed valid, their personal data may be processed where this is necessary to protect their own life or physical integrity, or that of another person.

3.2.4. Direct Relevance to the Establishment or Performance of the Contract

This condition shall be deemed to have been met where the processing of personal data is necessary, provided that such processing is directly related to the conclusion or performance of a contract to which the data subject is a party.

3.2.5. Fulfilment of the Company's Legal Obligations

If data processing is mandatory for our company to fulfil its legal obligations, the personal data of the data subject may be processed.

3.2.6. Publicization of Personal Data by the Personal Data Subject

Where the data subject has made their personal data public, the relevant personal data may be processed solely for the purpose of such publication.

3.2.7. Data Processing is Mandatory for the Establishment or Protection of a Right

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

3.2.8. Data Processing is Mandatory for the Legitimate Interest of our Company

Provided that it does not harm the fundamental rights and freedoms of the personal data subject, the personal data of the data subject may be processed if data processing is mandatory for the legitimate interests of our Company.

3.3. Processing of Sensitive Personal Data

As a general rule, sensitive personal data may not be processed without explicit consent. However, personal data may be processed without the need for explicit consent where at least one of the following conditions applies:

- The existence of the data subject's explicit consent,
- Explicitly stipulated in the Laws
- Where a person is unable to express their consent due to actual impossibility, or where their consent is not recognised as legally valid, it is necessary to protect their own life or physical integrity, or that of another person
- It must relate to personal data that the data subject has made public and be consistent with their intention to make it public
- It is necessary for the establishment, exercise or protection of a right,
- Processing carried out by persons subject to a duty of confidentiality or by authorised bodies and organisations for the purposes of safeguarding public health, the provision of preventive healthcare, medical diagnosis, treatment and care services, and the planning and management of healthcare services and their funding
- It is mandatory in order to fulfil legal obligations in the areas of employment, health and safety at work, social security or social assistance
- Foundations, associations and other non-profit organisations or bodies established for political, philosophical, religious or trade union purposes, in accordance with their statutes and objectives, be directed at their current or former members and affiliates, or at persons in regular contact with these organisations (provided that such information is not disclosed to third parties)

When processing sensitive personal data, it is mandatory to take the appropriate measures specified by the Board.

3.4.Informing the Personal Data Subject

Gazi Metal A.Ş. provides information to data subjects in accordance with the provisions of Article 10 of the Law.

3.5. Processing of Personal Data by the Company

Gazi Metal A.Ş. ensures that its operations are conducted in accordance with its principles, objectives and strategies, thereby safeguarding its rights, interests and reputation.

3.6. Transferring Personal Data

Our company may transfer the personal data and sensitive personal data of data subjects to third parties (third-party companies, public and private authorities, and third-party individuals) whilst taking the necessary security measures in accordance with the lawful purposes of personal data processing.

3.6.1. Domestic Transfer of Personal Data

Our company may transfer personal data and sensitive personal data to third parties in accordance with Article 8 of the Law, provided that at least one of the conditions for processing set out in sections 3.2 and 3.3 above is met.

3.6.2. International Transfer of Personal Data

In accordance with the provisions of Law No. 7499, the procedure for the transfer of personal data abroad has been restructured. Personal data may only be transferred abroad by our company where one of the following mechanisms is in place:

3.6.2.1. Decision on Eligibility: The existence of a decision on eligibility issued by the Board regarding the country to which the transfer is to be made, sectors within that country, or international organisations.

3.6.2.2. Appropriate Safeguards: In the absence of a decision on eligibility, provided that one of the conditions set out in Articles 5 and 6 of the Law is met and that the person concerned has the opportunity to exercise their rights and have access to effective legal remedies in the country to which the transfer is to be made, one of the following appropriate safeguards must be provided:

- Agreements with public bodies and organisations abroad or with international organisations which do not constitute international treaties, and the Board's authorisation,
- The approval of Binding Corporate Rules (BCR) by the Board,
- The conclusion of the standard contractual clauses (SCCs) published by the Board and their notification to the Authority within five working days,
- The provision of a written undertaking ensuring adequate protection and the obtaining of the Board's authorisation.

3.6.2.3. Unforeseen Circumstances (Exceptional Data Transfer): In cases where no eligibility decision has been made and appropriate safeguards cannot be provided; data may be transferred only where one of the exceptional circumstances listed in the Law applies, such as the data subject's explicit consent, the necessity for the performance of a contract, an overriding public interest, or the establishment of a right.

4. CHAPTER 4 – CATEGORISATION OF PERSONAL DATA PROCESSED BY OUR COMPANY AND THE PURPOSES OF PROCESSING

In accordance with Article 10 of the Law and secondary legislation, the relevant individuals are informed by our company and personal data is processed primarily on the basis of and limited to at least one of the conditions for processing personal data set out in Articles 5 and 6 of the Law in line with our company's purposes for processing personal data.

5. CHAPTER 5 – STORAGE AND DISPOSAL OF PERSONAL DATA

Our company retains personal data for the period necessary for the purpose for which it is processed and in accordance with the minimum retention periods set out in the relevant legislation governing the activity in question. Periodic data disposal processes are carried out in accordance with the Data Retention and Disposal Policy, which has been drawn up pursuant to the Regulation on the Erasure, Destruction or Anonymisation of Personal Data.

6. CHAPTER 6 – THE RIGHTS OF DATA SUBJECTS AND THE EXERCISING OF THESE RIGHTS

6.1. Rights of Data Subjects

Data subjects have the following rights under Article 11 of the Law:

6.1.1. To learn whether personal data is being processed,
6.1.2. To request information if the personal data has been processed,

6.1.3. To learn the purpose of processing personal data and whether they are used in accordance with their purpose,

6.1.4. To know the third parties to whom personal data are transferred domestically or abroad,

6.1.5. To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom the personal data has been transferred,

6.1.6. Although it has been processed in accordance with the Law and other relevant provisions of the law, to request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear and to request notification of the transaction made within this scope to third parties to whom the personal data has been transferred,

6.1.7. To object to the emergence of a result to the detriment of the person himself/herself by analysing the processed data exclusively through automated systems,

6.1.8. In case of damage due to unlawful processing of personal data, to demand compensation for the damage

6.2. Exercising of the Data Subject's Rights

Data subjects may submit requests regarding their rights to our Company in accordance with the Communiqué on the Procedures and Principles for Submitting Requests to the Data Controller (in writing, via a KEP address, secure electronic signature, mobile signature or an email address registered in our Company's system).

6.3. Replying to Enquiries by our Company

Our company will process the relevant request as soon as possible and within 30 (thirty) days at the latest, depending on the nature of the request.

If responding to the request incurs an additional cost, a fee in accordance with the tariff set by the Personal Data Protection Board may be charged. In the event that the data subject's request is rejected, the response is deemed insufficient, or no response is provided within the prescribed time limit, the data subject may lodge a complaint with the Personal Data Protection Board within 30 days of the date on which they were informed of the response and, in any event, within 60 days of the date of the request. Furthermore, pursuant to Law No. 7499, as of 1 June 2024, the principle has been introduced whereby appeals against administrative fines must be lodged with administrative courts rather than magistrates' courts.

7. CHAPTER 7 – SPECIFIC CIRCUMSTANCES IN WHICH PERSONAL DATA IS PROCESSED

7.1. Personal data processing activities carried out at building and facility entrances and within the premises, and website visitors

In order to ensure security, Gazi Metal carries out personal data processing activities at its premises, including CCTV surveillance and the monitoring of visitors' entries and exits.

7.2. CCTV Surveillance Operations Carried Out at the Entrances to and Inside Buildings and Premises of Gazi Metal A.Ş

Gazi Metal A.Ş. carries out CCTV surveillance at its buildings and premises to ensure security, in accordance with Law No. 5188 on Private Security Services and the relevant legislation. Only a limited number of authorised staff have access to live and digital recordings.

7.3. Monitoring of Visitor Entries and Exits at Building and Facility Entrances and Inside the Premises of Gazi Metal A.Ş

Gazi Metal A.Ş carries out personal data processing activities to monitor the entry and exit of visitors at Gazi Metal A.Ş's premises, for the purposes of ensuring security and for the purposes set out in this Policy.

The first names and surnames of individuals visiting the premises of Gazi Metal A.Ş. as guests are recorded, and the data subjects in question are informed of this in accordance with the relevant provisions through notices displayed on the premises of Gazi Metal A.Ş. or made available to guests in other ways. Data collected for the purpose of monitoring visitor arrivals and departures is processed solely for this purpose, and the relevant personal data is recorded in a physical data-recording system.