

ACCOMAR MARINE INTERIOR AS
POLICY ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

Document Name	: Accomar Interior Architecture A.Ş. Policy on Protection and Processing of Personal Data Target Group
Target Group	: Accomar Interior Architecture A.Ş. Employees, employee candidates, suppliers, shareholders, company officials, cooperating company employees and all similar real persons whose personal data are processed by us.
Prepared by	: Accomar Interior Architecture Inc. Human Resources and Administrative Affairs Department
Version	: 00
Approved by	:Accomar Interior Architecture Inc. Management board

This Policy will be updated from time to time in order to comply with the changing legislation.

This Policy on the Protection and Processing of Personal Data ("**Policy**"), in the capacity of data controller, Accomar İç Mimarlık A.Ş. ("**Accomar and/or Company**") processes supplier, visitor, agency employee, officer, employee candidates, suppliers, shareholders, company officials, collaborating company employees and similar interlocutor personal data.

Policy,

- I. Personal data collection methods and legal reasons,
- ii. Which person groups' personal data are processed (Data Subject Person Group Categorization),
- iii. Which category of personal data is processed in relation to these groups of people (Data Categories) and sample data types,
- iv. In which business processes and for what purposes this personal data is used,
- v. Technical and administrative measures taken to ensure the security of personal data,
- vi. To whom personal data can be transferred, and for what purpose
- vii. It explains what your rights are over your personal data processed by Accomar and what you can use and how these rights are

1- Definition and Abbreviations

In this section, special terms and phrases, concepts, abbreviations, etc. in the Policy. briefly explained.

Explicit Consent: Consent regarding a specific subject, which is given based on information and free will, and is limited for data processing purposes.

Anonymization: Making personal data incapable of being associated with an identified or identifiable natural person in any way, even by matching with other data.

Accomar: Accomar Interior Architecture Inc.

Employee: Accomar employee

Service Provider: Employee of the company (supplier, subcontractor, third party, cloud service provider, etc.) from which Accomar receives and/or provides services.

Personal Data Owner (Relevant Person): The natural person whose personal data is processed.

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

Processing of Personal Data: Obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available personal data by fully or partially automatic or non-automatic means provided that it is a part of any data recording system, All kinds of operations performed on data such as classification or prevention of use..

Institution: Personal Data Protection Authority

Board: Personal Data Protection Board

KVKK: Law No. 6698 on the Protection of Personal Data

Special Quality Personal Data: Data of the nature defined in Article 6 of KVKK

Policy: Accomarlıç Mimarlık A.Ş. Personal Data Protection and Processing Policy. .

Data Processor: It is the natural or legal person who processes personal data on behalf of the data controller, based on the authority given by the data controller.

Data Controller: It is the natural or legal person who determines the purposes and means of processing personal data, is responsible for the establishment and management of the data recording system, and is obliged to register with the Data Controllers Registry.

2- Personal Data Collection Methods and Legal Reasons

Accomar, in accordance with the personal data processing conditions specified in the 5th and 6th articles of the Personal Data Protection Law No. 6698 ("Law"), It processes your personal data in audio, visual, electronic or written form through notifications from administrative and judicial authorities and other communication channels..

3- Data Subject Person Group Categorization

Accomar suppliers, visitors, agency employees, officials, employee candidates, suppliers, shareholders, company officials, collaborating company employees and similar real persons as well as other person groups (consultants, trainers, auditors) in line with the legal reasons specified in this Policy.) can process your personal data.

4- Data Categories and Sample Types

- (i) Your Identity Information:** Name, surname, place of birth, date of birth, age, photo, identity and identity number, passport information,
- (ii) Your Contact Information:** Workplace address, home address, e-mail, telephone, mobile phone, residence, address registration system records,
- (iii) Family Status** : Data on marital status, number of children, spouse and children (identity, financial status),
- (iv) Professional Life** :Your data: employment history, employer name, graduated school, professional competencies, background information,
- (v)Special Qualified Data** : Medical Report, data on criminal convictions and security measures, membership in associations, foundations or unions,
- (vi) Banka Account Data** : Bank account data and IBAN information,
- (vii) Personnel file** : All kinds of surveys, reports on performance and career development, information regarding employment, training or interview, any fringe benefits or benefits to be offered to employees.employee data containing information and other similar information,
- (viii) Company Security** : Entry and exit camera recordings of company buildings,
- (ix) Cyber Security** : Usernames, passwords, IP address, website access logs regarding cyber security with logs,

5- Legal Obligations

In accordance with KVKK, Accomar has legal obligations within the scope of protection and processing of personal data. These obligations are listed as follows:

5.a Disclosure Obligation

Accomar is obliged to inform the relevant person during the collection of personal data and to inform the relevant person about the following in this context:

- Identity of the data controller and its representative, if any,
- For what purpose personal data will be processed,
- To whom and for what purpose the processed personal data can be transferred,
- Method and legal reason for collecting personal data,
- Rights of the person concerned.

Within the scope of Accomar's lighting obligation; will inform the related persons about the processing of their personal data by different means. In addition, Accomar attaches importance to making public policies understandable by personal data owners. The Accomar website contains information on the above-mentioned issues.

Which tools will be used regarding how to inform the relevant persons are determined in the relevant texts.

5.b Information Obligation

Pursuant to Articles 11 and 13 of the KVKK, Accomar evaluates the requests regarding the said rights; is obliged to inform the relevant persons, and this notification will be made within the period determined within the scope of the legal legislation.

Such requests must be submitted to Accomar in writing by the relevant persons or by other methods determined by the Board. In order not to contradict the Board's decision on this issue, Accomar tries to provide the relevant person with more opportunities to apply.

5.c Obligation to Ensure Data Security

Accomar, as a data controller, fulfills its obligations regarding data security arising from Article 12 of the KVKK.

5.d Obligation to Register with the Data Controllers Registry

Accomar is obliged to register with the Data Controllers Registry within the period determined and announced by the Board, pursuant to Article 16 of the KVKK.

Pursuant to article 16/3 of KVKK; An exception may be made to the obligation to register in the registry, taking into account the objective criteria to be determined by the Board, such as the nature and number of processed personal data, the legal origin of data processing or the transfer to third parties.

5.e Principles to be complied with regarding the processing of personal data

All collected personal data must be processed in accordance with the principles listed in Article 4 of the KVKK and in accordance with the conditions specified in Articles 5 and 6. Accomar, pursuant to Article 4 of the KVKK; is responsible for processing personal data by keeping it for the period required by the relevant legislation or for the purpose for which it is processed, in accordance with the law and the rules of honesty regarding the processing of personal data, accurately and, when necessary, for up-to-date, specific, clear and legitimate purposes, in connection with the purpose, in a limited and measured manner.

6- Purposes of Use of Personal Data

Accomar processes personal data limited to the purposes and conditions within the processing conditions of personal data and special quality personal data specified in Articles 5 and 6 of the KVKK. These purposes and conditions are as follows:

- It is clearly stipulated in the law for Accomar to carry out relevant activities regarding the processing of personal data,
- The processing of personal data by Accomar is directly related to and necessary for the establishment or performance of a contract,
- The processing of personal data is mandatory for Accomar to fulfill its legal obligation,
- Provided that the personal data has been made public by the relevant persons; processed by Accomar in a limited manner for the purpose of publicizing,
- The processing of personal data by Accomar is mandatory for the establishment, exercise or protection of the rights of Accomar or the relevant persons or third parties,
- It is mandatory to process personal data for the legitimate interests of Accomar, provided that it does not harm the fundamental rights and freedoms of the persons concerned,
- Processing personal data by Accomar is necessary for the protection of the life or physical integrity of the personal data owner or anyone else, and in this case, the personal data owner is unable to express his consent due to actual or legal invalidity,
- It is stipulated in the laws in terms of special quality personal data other than the health and sexual life of the personal data owner,
- In terms of sensitive personal data regarding the health and sexual life of the personal data owner, persons or authorized institutions and organizations that are under the obligation of confidentiality for the purpose of protecting public health, conducting preventive medicine, medical diagnosis, treatment and care services, planning and managing health services and financing processed by

In this context, Accomar processes your personal data for the following purposes:

- Creation and storage of the personnel file in the establishment, performance and termination processes of your employment contract.
- fulfillment of obligations of legal arising from the employment contract and the legislation to which our company is subject.

- Ensuring business continuity and planning and executing business activities,
- Planning, execution and reporting of human resources processes
- Planning and execution of financial and social rights,
- Creation and management of information security infrastructure,
- Planning and executing the access authorizations of the employees, keeping logs of their entrance and exit to the places they have access,
- Camera recording in designated areas in order to ensure the safety of the Company,
- Follow-up of cases to which the company is a party, responding to requests from judicial and administrative authorities, sending notices and warnings, issuing a power of attorney on behalf of the employee, if necessary,
- Preparation of necessary documents in accordance with the General Assembly and Board of Directors resolutions,
- Determination of working hours and disability, disability status,
- Planning and evaluation of training activities,
- Participating in events such as conferences, seminars, invitations, award ceremonies, promotions,
- Taking photos and videos in social activities,
- The use of photos and videos on the Company website, documents, the Company's social media accounts and other company events,
- Planning domestic or international travel and accommodation, conducting visa and passport application processes,
- Making Supplementary and Private Health Insurance, Personal Accident Insurance and Liability Insurance,
- Performing disciplinary and investigation procedures in accordance with legal regulations and internal company procedures,
- Financial reporting and accounting controls,
- Realization of compulsory private pension transactions,
- Taking workplace health and safety measures, making entry-return examinations, periodic examinations, disease examinations, pregnancy follow-up examinations by the workplace physician,
- Sending congratulation/condolence or get well soon messages in case of birth, death, marriage, serious illness and surgery to employees and their family members,
- Counseling and support activities.

7- Technical and Administrative Measures Taken to Ensure the Security of Personal Data

Personal data will be kept confidential in the database in Accomar in accordance with Article 12 of the Law and will not be shared with third parties for commercial purposes.

Accomar, in order to ensure the security of the personal data it processes, to prevent unlawful access and to prevent unlawful data processing; takes encryption, transaction log, access management and physical security measures to ensure that information systems containing personal data are protected against unauthorized access and illegal data processing.

Although Accomar takes the necessary information security measures, personal data is damaged or passed into the hands of third parties as a result of attacks on the website and system.

In case of an attack Accomar immediately notifies the persons whose personal data has been damaged, and the Personal Data Protection Board, in accordance with the Board's Decision dated 24.01.2019 and numbered 2019/10.

8- To whom and for what purpose the processed personal data can be transferred

Your personal data; In line with the purposes detailed in the "Purposes of Use of Personal Data" heading, it may be transferred to the following persons/organizations:

- I. Third parties at home and/or abroad with whom Accomar has a contractual relationship,
- II. To public institutions and organizations that are legally authorized to request personal data regarding physical visitors, in case of request,
- III. Personal data regarding suppliers, companies, subsidiaries and related public institutions with which business is done within the scope of the contract regarding the goods, products or services provided,
- IV. To all institutions and organizations permitted by the provisions of the legislation.

9- Rights of Data Owner

The rights you have on your personal data you have shared with us within the scope of the purposes and processing methods of personal data set forth in this Policy, pursuant to Article 11 of the Law, are as follows:

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- i. Learning whether personal data is processed or not,
- ii. If personal data has been processed, requesting information about it,
- iii. Learning the purpose of processing personal data and whether they are used in accordance with their purpose,
- iv. To know the third parties to whom personal data is transferred in the country or abroad,
- v. To request correction of personal data in case of incomplete or incorrect processing,
- vi. Requesting the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of the Law,
- vii. Requesting notification of the transactions made pursuant to clauses 7.(v) and 7.(vi) to third parties to whom personal data has been transferred,
- viii. Objecting to the emergence of a result against the person himself by analyzing the processed data exclusively through automated systems,
- ix. To request the compensation of the damage in case of loss due to unlawful processing of personal data.

To use these rights; Pursuant to Article 11 of the Law, you can submit your requests regarding your personal data together with information/documents confirming and confirming your identity, provided that you comply with the procedures and principles set forth in the Communiqué on Application Procedures and Principles to the Data Controller;

- I. You can apply to our company address in writing with a petition.
- II. You can send an e-mail from your KEP address to the Registered E-mail address (accomar@hs01.kep.tr) on our company's website.
- III. You can send an e-mail to "**kisiselveri@accomar.com.tr**" with a secure electronic signature or from the e-mail address you have given to our Company and registered in our system.

10-Update Period

In case of changes in line with the economic and commercial decision of Accomar or the decisions of the Personal Data Protection Board, our members whose data are recorded will be notified by the way they are registered.

11-Enforcement

This data policy enters into force on the date of publication and remains in effect until it is removed from the website.

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