

I. PURPOSE AND SCOPE

As data officer, 2M Kablo Sanayi Ve Ticaret A.Ş. and 2M Kablo Pazarlama ve Dış Ticaret A.Ş. ("2M Kablo") we act in the framework of principles of this "policy" for processing of personal data of our customers who use products and services, including, but not limited to, potential customers, employees, family members of employees, employees that connected trade union representatives and employees, apprentices, working candidates, shareholders, staff, suppliers, consultants, dealers, our collaborating companies and their employees, shareholders, authorities, our visitors, our users who visit our website and mobile applications, in short, data of persons who are in contact with our company during their activities according to Constitution of the Republic of Turkey, international conventions our country is a party and Law No. 6698 on protection of personal data ("PDPP") with respect to rights of the persons concerned and to ensure effectively that any personal data that we receive, process, store and transfer are processed in accordance with the relevant legislation.

This policy applies to all personal data of the data owners mentioned above that is automated or processed by non-automated means, provided that it is part of any data recording system.

II. DESCRIPTIONS

Terms and phrases, concepts, abbreviations, etc. mentioned in our policy are defined below.

- a. 2M Kablo: 2M Kablo Sanayi ve Ticaret A.Ş.
- b. Explicit consent: consent given only limited to that transaction in an openness that will leave no room for hesitation, based on the information and free will, on a particular subject.
- c. Anonymization: this is the making of personal data that cannot be associated with an identified or identifiable natural person under any circumstances, even by matching it with other data.
- d. Employee: 2M Kablo staff.
- e. Personal Data owner (contact person): a natural person whose personal data is processed.
- f. Personal data: any information relating to an identified or identifiable natural person.
- g. Qualified special personal data: race, ethnic origin, political opinion, philosophical belief, religion and sect, or other beliefs, health information, fingerprints, costume and clothing, association or trade union membership, health, sexual life, criminal convictions, and security measures, data on genetic and biometric data of any person.
- h. The processing of personal data: Provided that the personal data is fully or partially automated or is part of any data recording system acquisition, recording, storage, storage, modification, reorganization, disclosure, transfer, inheritance, making it available, classification or any actions performed on data, such as preventing its use by non-automatic means.
- i. Data Processor: a natural or legal person who processes personal data on behalf of the data officer based on the authority granted by the data officer.
- j. Data officer: a natural or legal person responsible for establishing and managing a data recording system that determines the purposes and means of processing personal data.
- k. Department Manager (s): means the manager of the department who is the owner or responsible for the process or project that requires a personal data processing activity.
- l. Project team: it is a group consisting of managers and/or representatives of the relevant department responsible for control and follow-up within the scope of ensuring and maintaining compliance with the protection of personal data.
- m. Personal Data Protection Committee: a unit that will provide the necessary coordination in the company within the framework of ensuring and maintaining compliance with the legislation on the protection of personal data by 2M Kablo.
- n. PDP board: Personal Data Protection Board.
- o. PDP institution: Personal Data Protection Agency.
- p. PDPP: law on the protection of personal data published in the Official Gazette dated April 7, 2016 and numbered 29677.
- q. Policy: Personal Data Protection and Processing Policy of 2M Kablo Sanayi ve Ticaret A.Ş.

III. DUTIES AND RESPONSIBILITIES

In all activities for processing and protection of personal data within the framework of the PDP policy, the PDP Committee will be the guide. All our employees, stakeholders, dealers, suppliers, solution partners, consultants throughout our company and their employees, our guests, our visitors and related third parties whose personal data is processed, including but not limited to are obliged to comply with 2M Kablo PDP policy and cooperate with the PDP committee in the disposal of risks from a legal point of view. The PDP Committee is responsible for ensuring that all bodies and departments of our company comply with the PDP policy. The PDP Committee shall carry out the duties and responsibilities assigned to it in accordance with the PDP policy. In this context, as a data officer, the duties and responsibilities of the PDP Committee within our company are defined as follows.

III.I Personal Data Protection Committee

Within the framework of PDPP and in the process of compliance with this law, a PDP Committee has been established within our company. Committee is obliged to;

- a. Ensure compliance with this policy throughout our company and effective implementation of the personal data protection and regulatory compliance program provided for by the policy,
- b. Carry out the necessary assignments and coordination within the daily activities for the implementation of the PDP policy,
- c. identify and inform management of the issues that need to be done to ensure compliance with the legislation on the protection of personal data, express an opinion on issues of this scope spontaneously or on request, or perform the necessary actions to obtain an expert opinion on this issue,
- d. To raise awareness of legislation and information security issues within the scope of personal data protection within our company and before the institutions in which our company cooperates, to ensure that the necessary training is carried out for the employees of our company who process personal data,

- e. Maintain and monitor the necessary communication with public institutions and private organizations for the protection of personal data, especially the PDP institution and the PDP Board,
- f. Manage applications of personal data owners, make final decisions on them and ensure timely response to applications,
- g. Ensure that our company's personal data processing inventory is kept up to date and that the necessary notifications are made to the registry of data officers,
- h. Ensure that the necessary records are kept to prove our company's compliance with the personal data protection legislation within the scope of the PDP policy,
- i. Investigate noteworthy case studies in terms of data security, personal data owners and to determine and apply the necessary measures to reduce or and to minimize the risks that may arise regarding the company, personal data owners and ensure that the necessary notifications are made to the board of PDP,
- j. Ensure that the PDP policy reflects the requirements of legal, technological and organizational changes, and ensure that our company is aware of such changes in a timely manner,
- k. Ensure that PDP policies are reviewed for certain periods and submitted for management approval, together with the reasons for the projected changes,

III.II Department Managers

The manager of that department is responsible for carrying out data processing activities within the processes of the relevant unit in each department within our company.

The Department Manager, within his department, fulfills the requirements of the PDP Policy and legislation and works in cooperation with the contact person and the PDP Committee in this context. In these matters, he receives support from other employees within his department and can delegate responsibility when necessary.

III.III All Employees

All employees of our company are obliged to master the policies of PDP and to follow the rules contained in their content. In this context, all employees of our company continue to work in harmony with the PDP Committee and its contact person, make feedback on improving the PDP Policy and act in cooperation.

In case of violation of PDP policies and procedures, the necessary legal means will be applied within the framework of the Labor Law and related laws.

IV. PRINCIPLES OF POLICY

In accordance with 20th article of the Constitution and 4th Article of the PDP law regarding the processing of personal data our company is engaged in personal data processing according to the law and the rules of honesty in a correct and updated way for specific, clear and legitimate purposes in a purposeful, limited and measured form and retains personal data for as long as required by law or for the purpose of processing personal data.

Within the scope of the field of activity our company processes personal data, identity, contact information, usage habits, financial data, health data, claims and complaints management data related to all kinds of products of our customers who benefit from their products and services, potential customers, employees, trade unions to which our employees are affiliated, representatives and employees, interns, employee candidates, shareholders, officials, suppliers, consultants, authorized sellers, authorized services, the companies we cooperate with and their employees, shareholders, officials, visitors, our users who visit our website and mobile applications, in short, personal data belonging to people who have been in contact with our company during our activities data such and this data is processed for the purposes of fulfilling the financial and legal obligations of the company, as well as the fact that data holders can benefit from 2M Kablo products and services, be informed of marketing, promotions and innovations, performance of the work, fulfillment of the requirements of the contract on the basis of the following criteria, provided that data owners are informed and consent is

obtained in cases where explicit consent is required by law.

V. TERMS OF PROCESSING OF PERSONAL DATA

The basis of personal data processing may be one or more of the following conditions.

a. Having the explicit consent of the personal data owner

One of the conditions for processing personal data is the explicit consent of the data owner. The explicit consent of the owner of personal data must be disclosed on a specific issue, based on information and of free will. Personal data may be processed without the explicit consent of the data owner in case of the existence of the following personal data processing conditions.

b. Clearly stipulated in the laws

If the personal data of the data owner is clearly provided for in the law, in other words, if there is a clear provision in the law regarding the processing of personal data, the existence of this data processing requirement may be mentioned.

c. Inability to obtain explicit consent of the person concerned due to actual impossibility

The personal data of the data owner may be processed if the processing of personal data of a person who cannot disclose his consent due to actual impossibility or whose consent cannot be valid in case it is mandatory to protect the life or body integrity of himself or another person.

d. Direct interest in the establishment or execution of the contract

Personal data may be processed if it is necessary to process personal data because it is directly related to the establishment or execution of a contract to which the data subject is a party.

e. Fulfilling the company's legal obligation

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

- f. Publicizing the personal data of the personal data owner

If the data owner has publicly disclosed his personal data, the relevant personal data may be processed for limited purposes.

- g. Data Processing is mandatory for the establishment or protection of a right

If data processing is mandatory for the establishment, use or protection of a right, the personal data of the data owner may be processed.

- h. Data Processing is mandatory for the legitimate interest of our company

Personal data of the data owner may be processed if data processing is mandatory for the legitimate interests of our company, provided that it does not damage the fundamental rights and freedoms of the personal data owner.

VI. PROCESSING OF SPECIAL-NATURE PERSONAL DATA

Special qualified personal data is processed by our company by taking all necessary administrative and technical measures in accordance with the legislation and the principles set out in this policy and in the presence of the following conditions:

a. Personal data of special nature other than health and sex life may be processed without the explicit consent of the data owner, if expressly provided for by law. Otherwise, the explicit consent of the data owner will be obtained.

b. Personal data of special quality related to health and sex life, protecting public health, preventive medicine, medical diagnosis, conducting treatment and care services may be processed without explicit consent by persons or authorized institutions and organizations under the obligation to keep confidential for the purpose of planning and managing health services and these services. Otherwise, the explicit consent of the data owner will be obtained.

As 2M Kablo, our purpose for processing personal data with special qualifications is as given below.

- Fulfillment Of Obligations Arising From The Employment Contract And Legislation For Employees

- Follow-Up and Execution Of Legal Affairs
- Planning Human Resources Processes
- Conduct / Audit of Business Activities
- Conducting Occupational Health / Safety Activities
- Providing Information to Authorized Persons, Institutions And Organizations

VII. PURPOSES OF PROCESSING PERSONAL DATA

Limited to the purposes and conditions within the personal data processing terms specified in the paragraph 2nd paragraph of 5th article and 3rd paragraph of 6th article of PDP Law, our company processes personal data with the following purposes and conditions. These objectives and conditions are:

- Execution of information security processes
- Conducting the selection and placement processes of employee candidate / trainee / student
- From the point of view of employees; creation of a personal file, determination of whether they are capable of constantly fulfilling the requirements of the job, creation of private health insurance, creation of a health file,
- Execution of application processes of employee candidates
- Execution of employee satisfaction and loyalty processes
- Fulfillment of obligations arising from the employment contract and legislation for employees
- Execution of ancillary rights and interests processes for employees
- Conducting audit / ethical activities
- Other-conducting meeting activities
- conducting educational activities
- Execution of access powers
- Carrying out activities in accordance with the legislation
- Carrying out finance and accounting works
- Invoice issuing and collection operations,
- Financial reconciliation with related business partners and other third parties,

- Ensuring physical space security
- Execution of assignment processes
- Follow-up and execution of legal affairs
- Conducting internal audit/ investigation / intelligence activities
- Conducting communication activities
- Planning human resources processes
- Conduct / audit of business activities
- Conducting occupational health / safety activities
- Taking and evaluating recommendations for improving business processes
- Carrying out activities to ensure business continuity
- Conducting research and development and production activities
- Carrying out logistics activities
- Carrying out the processes of purchasing goods / services
- Conducting after-sales support services for goods / services
- Execution of goods / services sales processes
- Execution of goods / services production and operation processes
- Execution of customer relationship management processes
- Carrying out activities for customer satisfaction
- Organization and event management
- Execution of performance evaluation processes
- Execution of risk management processes
- Carrying out storage and archive activities
- Execution of contract processes
- Follow-up of requests / complaints
- Ensuring the security of movable property and resources
- Execution of wage policy
- Execution of investment processes
- Conducting talent / career development activities
- Providing information to authorized persons, institutions and organizations
- Execution of management activities
- Creation and tracking of visitor records
- Purchasing services from external sources,
- Receiving services on issues that are not covered within their area of expertise,

- Identity confirmation,
- Providing the necessary information in accordance with the requests and audits of official authorities,
- Publication of visual and auditory data obtained in competitions, organizations, studies and other activities within the scope of the field of activity for the purpose of creating corporate memory and developing work
- Use of the data obtained through the website or social media channels for marketing purposes through 3rd party agencies,
- Fulfillment of legal obligations,
- Execution/monitoring of reporting and risk management operations,

VIII. DISCLOSURE OF PERSONAL DATA OWNER

In accordance with 10th article of PDP Law and secondary legislation our company informs the owners of personal data about who is responsible for the data, for what purposes their personal data is processed, for what purposes it is shared with whom, by what methods it is collected and the legal reason and the rights of the data owners within the scope of the processing of their personal data.

IX. TRANSFER OF PERSONAL DATA

Our company is entitled to transfer the personal data of the personal data owner and special qualified personal data to third parties (third party companies, group companies, third party real persons) by taking the necessary security measures for the purposes of personal data processing in accordance with the law. Personal data may be transferred by our company to third parties, provided that legal, technical and administrative measures are taken in accordance with applicable legislation and regulations, if one or more of the following conditions exist, even without the explicit consent of the data owner.

- Clearly foreseeing the relevant activities related to the transfer of personal data in the law,

- The transfer of personal data by the company is directly related and necessary to the establishment or execution of a contract,
- The transfer of personal data is mandatory for our company to fulfill its legal obligation,
- Disclosure of personal data by the data owner,
- The transfer of personal data by the company is mandatory for the establishment, use or protection of the rights of the company or the data owner or third parties,
- It is mandatory to carry out personal data transfer activities for the legitimate interests of the company, provided that they do not harm the fundamental rights and freedoms of the data owner,
- A person who cannot disclose his consent due to actual impossibility, or whose consent is not granted legal validity, it is required to protect the life or body integrity of himself or someone else.

In addition to the above, personal data may be transferred to foreign countries declared by the board to have adequate protection in the presence of any of the above conditions. In the absence of adequate protection, in accordance with the data transfer requirements provided for in the legislation, may be transferred to foreign countries where data officers in Turkey and in the relevant foreign country undertake adequate protection in writing and have the permission of the Board.

X. SPECIAL QUALIFIED PERSONAL DATA TRANSFER

Special qualified personal data is processed by our company by taking all necessary administrative and technical measures in accordance with the legislation and the principles set out in this policy and in the presence of the following conditions:

- a. Personal data of special nature other than health and sex life may be processed without the explicit consent of the data owner, if expressly provided for by law. Otherwise, the explicit consent of the data owner will be obtained.
- b. Personal data of special quality related to health and sex life, protecting public health, preventive medicine, medical diagnosis, conducting treatment and care services may be processed without

explicit consent by persons or authorized institutions and organizations under the obligation to keep confidential for the purpose of planning and managing health services and these services. Otherwise, the explicit consent of the data owner will be obtained.

In addition to the above, personal data may be transferred to foreign countries with adequate protection in the presence of any of the above conditions. In the absence of adequate protection, in accordance with the data transfer requirements stipulated in the legislation, it can be transferred to foreign countries where data controllers in Turkey and the relevant foreign country undertake adequate protection in writing and where there is a data controller who undertakes adequate protection in that country.

XI. PERSONAL DATA RETENTION PERIODS

Our company stores personal data during the period specified in these legislation, taking all necessary legal, technical and administrative measures in accordance with the scope of PDPP, if provided for in the relevant laws and regulations.

If no time is specified in legislation regarding the duration of the personal data that should be kept, depending on the activity that our company conducts when processing this data personal data is stored for a period of time that requires it to be stored in accordance with practices and industry practices and it is then deleted, destroyed or anonymized in accordance with the relevant policy created by our company according to the nature of the data.

If the purpose of processing personal data has ceased or if the retention periods determined by our company and the relevant legislation have reached the end and if personal data constitute evidence in possible legal disputes. it may be stored for the purpose of asserting the relevant right related to personal data or establishing a defense. Time-out periods for asserting the time periods here, although the time-out periods have passed retention periods are determined based on examples of requests previously addressed to our

company on similar issues. In this case, the personal data stored is not accessed for any other purpose and access to the relevant personal data is provided only when it should be used in the relevant legal dispute. Personal data is also deleted, destroyed or anonymized after the period mentioned herein has expired. Our principles for storing personal data are described in our company's "Personal Data Retention and destruction policy."

XII. RIGHTS OF PERSONAL DATA OWNERS AND EXERCISE OF THESE RIGHTS

Personal data owners under PDPP are entitled to,

1. Learn whether personal data has been processed,
2. Request information about personal data if it has been processed,
3. Learn the purpose of processing personal data and whether it is used for its purpose,
4. Learn about third parties with whom personal data is transferred at home or abroad,
5. Request that personal data be corrected if it is incomplete or incorrectly processed, and request that the transaction made in this context be notified to third parties where the personal data is transferred,
6. If personal data is processed in accordance with the provisions of this law and other relevant laws, in the case of the disappearance of the reasons requiring processing, request destruction or deletion of personal data, request to be notified of the process the personal data transferred to third parties,
7. Object to the occurrence of a result against the person himself by analyzing the processed data exclusively through automated systems,
8. If personal data is damaged due to illegal processing, they have the right to request the removal of the damage.

Personal data owners are entitled to submit their requests for these rights to our company using methods determined by the board. In this direction the data owner can use the application form, which can be accessed at the www.2mkablo.com address. Our company will evaluate the application made by the data subject and conclude the relevant request free of charge as soon as possible and no later than 30 (thirty)

days according to the nature of the request. However, if the transaction also requires a cost, a fee may be charged in accordance with the tariff set by the board.

XIII. REVIEW AND CONTROL

XIV.

By following the legal, technological and organizational changes and developments that may occur within the scope of personal data protection, the PDP board within our company ensures that the necessary actions are taken to make our company compatible with these developments.

The PDP Board examines personal data processing activities and any issues related to these activities themselves or upon complaint. As a result of the review, matters found to be not in compliance with the rules and/or legislation set out in the PDP policies and suggestions for improvement related to them are reported to the management by the PDP Board. In this context, the contact person follows the necessary works.

The PDP Board conducts a review at least 1 (one) time a year to ensure compliance with our company's personal data protection legislation. The review in question is carried out personally by the PDP Board.

As a minimum, the following considerations are examined in these review activities:

- a. Effective and correct implementation of PDP policies, duties and responsibilities are assigned by management, assumed and fulfilled by employees,
- b. Adequate level of training and awareness of employees,
- c. Accurate, complete and up-to-date personal data processing inventory, disclosure statements and other documents,
- d. Effective and adequate administrative and technical measures taken for personal data security,
- e. Being up-to-date with PDP policies in response to legal, technological and organizational developments.

The improvement points identified after the review are reported to the management by the PDP Board and the necessary work is followed by the contact person. The PDP Board ensures that the necessary improvements are made with management approval within the framework of these determinations.

XV. IMPLEMENTATION OF POLICY AND RELATED LEGISLATION

The relevant legal regulations in force on the processing and protection of personal data will first have an application area. If there is a discrepancy between the current legislation and the policy, the policy will be updated within the framework of the current legislation.