

Türk Traktör ve Ziraat Makineleri A.Ş.

Personal Data Protection Policy

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1 PURPOSE AND SCOPE

This Policy has been prepared by considering the ethical principles of TürkTraktör's Main Shareholders to be carried out in compliance with the principles of lawfulness, good faith, and transparency.

The employees and executives of TürkTraktör are obliged to act in accordance with this Policy. Business Partners are also expected to act in accordance with the rules and principles of this Policy to the extent that they are applicable to the relevant transactions.

2 DEFINITIONS

“Anonymization” Making personal data unrelated to an identified or identifiable natural person under any circumstances, even when by matching with the other data.

“Business Partners” Suppliers, vendors, authorized service companies, all kinds of representatives, subcontractors and consultancies acting on in the name of and on behalf of the company.

“Data Controller” A real or legal person who determines the objectives and means of personal data processing and is responsible for the establishment and management of the data recording system.

“Data Processor” A real or legal person that processes personal data for and on behalf of the data controller based on the authorization granted by the data controller.

“Data Subject” A real person of whom personal data are processed. (customers, visitors, employees and employee candidates, etc.).

“Explicit Consent” Consent related to a specific subject, based on information and expressed with a free will.

“Legislation” All of the relevant legislation in force in Turkey and relevant countries regarding the protection of personal data, especially the Law on the Protection of Personal Data No.6698.

“Main Shareholders” are CNH Industrial Österreich GmbH and Koç Holding A.Ş.

“Personal Data” Any information related with an identified or identifiable real person.

“Processing of Personal Data” Any activity performed on data such as obtaining personal data by fully or partially automatic means or non-automatic means that are part of a data registration system; recording, storage, retention, revision, modification, disclosure, transfer, receiving of data, rendering the data obtainable or classification or prevention of use.

“Special Categories of Personal Data” Race, ethnic origin, political view, philosophical belief, religion, religious sect or other beliefs, clothing style, association, foundation or union membership, health, sexual life, criminal convictions, and security measures as well as biometric and genetic data are special categories of personal data.

“TürkTraktör” means Türk Traktör ve Ziraat Makineleri A.Ş.

“VERBİS” Data Controllers Registry Information System

3 GENERAL PRINCIPLES

Breach of this Policy may result in significant consequences for TürkTraktör, their associated executives and employees including legal, administrative, and criminal penalties based on the Legislation in the region of operation, and, most significantly, the breach may result in serious harm to the reputation of TürkTraktör and Main Shareholders.

One of the most important issues for TürkTraktör is to act in accordance with the Legislation and the general principles set out in the Legislation with regards to processing of personal data. In this regard, TürkTraktör are expected to follow the guidelines outlined below when processing personal data in compliance with the Legislation.

TürkTraktör, carries out the personal data processing practices within the scope of its activities in accordance with the TürkTraktör Anonim Şirketi Personal Data Protection and Processing Policy¹

3.1 Processing of personal data in accordance with the law and principle of good faith

The general rule of trust and good faith in compliance with the Legislation is adhered to on the subject of personal data processing. In this context, personal data are processed in accordance with general principles of law, good-will and general morality to the extent required by business activities and limited to these activities.

3.2 Ensuring that personal data is accurate and up-to-date when required

Systems are established, and necessary measures are taken to ensure that the personal data being processed are accurate and up-to-date while taking account of data subjects' rights.

3.3 Processing of personal data for specific, explicit and legitimate purposes

Personal data are processed for legitimate and lawful purposes. TürkTraktör only processes personal data in connection with their activities and to the extent necessary. Prior to personal data processing operations, the purposes for processing personal data are determined.

3.4 Being limited, proportionate and relevant to the purpose of processing

Personal data are processed adequately for carrying out the determined purposes and processing of personal data that is not necessary for fulfilling the purposes are avoided.

3.5 Storing for the Period Stipulated in the Relevant Legislation or the Period Required for the Processing Purpose

Personal data are only stored for the period stipulated in the relevant Legislation or for the period required for the personal data processing purpose.

In this regard, firstly determination is made whether a certain period is stipulated for the storage of personal data in the relevant Legislation, if any period was determined, this period are complied with. If no period was determined, personal data is stored for the period required for

¹ <https://www.turktraktor.com.tr/kurumsal/kisisel-verilerin-korunmasi>

carrying out the purpose of the processing. Personal data are erased, destructed, or anonymized in case the period expires or the reason for its processing no longer exists. Personal data are not stored based on the possibility of future use.

4 APPLICATION OF THE POLICY

4.1 PROCESSING PERSONAL DATA BASED ON THE DATA PROCESSING CONDITIONS

4.1.1 Execution of Personal Data Processing Activities Based on the Personal Data Processing Conditions Specified in the Legislation

As a rule, personal data is processed based on at least one of the conditions specified in the Legislation. Determination is made on whether the personal data processing activities carried out by the company's business units are based on at least one of the conditions. Personal data processing activities that do not meet this requirement are not included in the processes.

4.1.2 Execution of Special Categories of Personal Data Processing Activities Based on Special Categories of Personal Data Processing Conditions Stipulated in the Legislation

As a rule, special categories of personal data is processed based on the conditions specified in the Legislation. Special categories of personal data processing activities carried out by the company's business units are in line with these conditions, the necessary technical and administrative measures for the processing of the special categories of personal data are taken and it is ensured that the following conditions are met:

(i) **Special categories of personal data excluding health and sexual life** can be processed without the explicit consent of data subjects if it is explicitly stipulated in the laws, in other words, if there is an explicit provision in the relevant law regarding the processing of personal data. Otherwise, explicit consent of the data subject should be obtained.

(ii) **Special categories of personal data regarding health and sexual life** can be processed without the explicit consent of data subjects for the purposes of the protection of public health, carrying out preventive medicine, medical diagnosis, treatment and care services, planning of financing and management of health services by the persons who are bound with professional secrecy or legally authorized authorities and institutions. Otherwise, explicit consent of the data subject should be obtained.

Processing of special categories of personal data is carried out in accordance with the provisions set out in the Legislation regarding the processing of special categories of personal data and transfer of data to domestic third parties and abroad. In addition to the above-mentioned matters, in these cases, personal data processing activities also are carried out by fulfilling the special requirements set forth in the Legislation.

4.2 REQUIREMENTS TO BE COMPLIED WITH FOR TRANSFER OF PERSONAL DATA

Personal data of data subjects is transferred to third parties in accordance with the purposes and legal basis for personal data processing and by taking the necessary security measures. In this

regard, necessary processes for acting in accordance with the conditions stipulated in the Legislation are designed.

4.3 OBLIGATIONS RELATED TO THE PROTECTION AND PROCESSING OF PERSONAL DATA

4.3.1 Obligation to Register with VERBİS

TürkTraktör was registered with VERBİS as Data Controller since it is under the obligation to register according to the criteria stipulated in the Legislation. In case of a revision in the registered information, the information in VERBİS is updated within seven days from the date of revision.

Koç Holding Legal and Compliance Department is given a report and informed twice a year, every 6-month periods (June-December) by the company's attorneys in charge of compliance regarding the updates made by the Company in VERBİS.

4.3.2 Obligation to Inform Data Subjects

Data subjects are informed at the time of collection of personal data in accordance with the Legislation.

In this regard, the personal data collection channels are determined for the fulfillment of the obligation to inform; data subjects are informed through the privacy notices which comply with the scope and conditions specific to these collection activities required in the Legislation; the appropriate processes are designed.

Company keeps the personal data collection channels up to date as a list and share the list with the Koç Holding Legal and Compliance Department through company's attorneys in charge of compliance after being reviewed twice a year, every 6-month periods (June-December).

4.3.3 Obligation to Ensure the Security of Personal Data

Along with the awareness on the importance of ensuring data security in all aspects, necessary and adequate technical and administrative measures are taken to prevent unlawful processing of personal data or access to data, and to store data in accordance with the Legislation and in this regard necessary audits are conducted by the company and/or have audits conducted by a third party.

Within the scope of the measures taken by the company, educations regarding the Legislation are given to the employees. Trainings held within this scope are carried out by company's attorneys in charge of compliance, and Koç Holding Legal and Compliance Department is informed.

4.3.4 Audit of the Measures Taken for the Protection of Personal Data

Systems for conducting and having the necessary audits regarding the functioning of the measures taken in terms of technical and administrative measures are built. These audit results are reported to the company's attorneys in charge of compliance, and the necessary actions are taken to improve the measures taken. In addition, the annual audit report and the measures taken

by the company are shared with Koç Holding Legal and Compliance Department.

4.3.5 Measures to be Taken in Case of Unauthorized Disclosure of Personal Data

The data subject and the relevant authorities are informed as soon as possible in compliance with the Legislation in case the processed personal data is illegally obtained by third parties. In this context, the necessary internal structure in which the company's attorneys in charge of compliance take part, was created within the company. Additionally, in such cases, Koç Holding Legal and Compliance Department is informed immediately.

4.3.6 Obligation to Inform the Data Subject

The data subjects have the right to request information about their processed personal data by applying data controllers whenever they need.

In this context, the necessary procedures and processes were established and implemented within the company in the matters of designing the necessary application channels in accordance with the Legislation, evaluating the applications, answering the applications within the periods stipulated in the Legislation in order to evaluate the rights of the data subjects and to provide the necessary information to the data subjects.

In the case that the data subjects submit their requests regarding their rights to the company, the relevant request is responded as soon as possible and within thirty days at the latest.

While concluding the relevant application of the data subject, information is provided with a wording and format easily understandable to the data subject. Necessary warnings are given within the company and awareness is ensured that data subjects have a right to complain to the relevant authority in the case that the data subject's application is rejected, the response is insufficient, or the application is not responded within the stipulated timeframe.

Data subject applications and the response processes are kept as a list by the Company and shared with the Koç Holding Legal and Compliance Department through company's attorneys in charge of compliance after being reviewed twice a year at 6-month periods (June-December). In addition, the opinions of the company's attorneys in charge of compliance and of the Koç Holding Legal and Compliance Department are taken before any action is taken regarding all kinds of information and document requests from the relevant authorities to the company and all kinds of applications to be made by the company to these authorities.

5 AUTHORITY AND RESPONSIBILITIES

All TürkTraktör employees and directors are responsible to comply with this Policy. TürkTraktör expects its Business Partners to comply with this Policy to the extent applicable to the relevant party and operation and takes necessary steps for this.

Company's attorneys in charge of compliance are the responsible body for the implementation of this Policy.

In case of being aware of any action considered to be contrary to this Policy, the Legislation in force or Main Shareholders and/or TürkTraktör Code of Ethics, you may contact the company's attorneys in charge for compliance or the Koç Holding Legal and Compliance Department.

Please contact the department or persons listed above for your queries or concerns. As an alternative method, you can make all your notifications about ethical violations to TürkTraktör Ethics Line via the following link: “<https://www.turktraktor.com.tr/contact/ethical-issues-form>”, or to Koç Holding Ethic Line via “koc.com.tr/hotline”.

Breach this Policy might result in significant disciplinary penalties including dismissal. In the case of breach of this Policy by third parties, the legal relationship between those parties and the TürkTraktör might be terminated immediately.

6 EFFECTIVE DATE

This Policy being effective from the date of 18.11.2021 and Company's attorneys in charge of compliance are responsible for the execution of the Policy.

Revision	Date	Comment