

KALE HAVACILIK SAN. A.Ş. POLICY ON THE PROTECTION OF PERSONAL DATA

CONTENTS

Policy on the Protection of Personal Data.....	3
1. Definition of Personal Data.....	3
2. Legal Basis for Collecting Personal Data.....	4
3. Our Principles for Processing Personal Data.....	4
4. Our Personal Data Protection Applications.....	4
5. Personal Data Management Organisation.....	5
6. Duties and Responsibilities.....	5
7. Rights of Data Subjects Pursuant to the Law on the Protection of Personal Data..	7
8. Policy Update.....	7

Kale Havacılık San. A.Ş.

Policy on the Protection of Personal Data

We, Kale Havacılık Sanayi A.Ş. (hereinafter referred to as “KALE HAVACILIK”), made it a principle to protect all personal data of real persons which we access in any way and in this scope to fulfill requirements under the Law on the Protection of Personal Data and applicable legislation completely.

KALE HAVACILIK assumed responsibility in the capacity of data controller in the matter of establishing organisation necessary for the purpose of protecting information confidentiality and integrity and taking and adapting technical measures as per provisions of applicable legislation in force.

KALE HAVACILIK takes measures necessary to protect personal data against unauthorized access or loss, erroneous use, disclosure, modification or destruction of such information.

KALE HAVACILIK at the moment of becoming aware of any breach, informs users on this subject promptly, enables follow-up in conformity with laws and provides information security to the best of its ability.

1. Definition of Personal Data

The term “personal information” used in this present Policy on the Protection of Personal Data will mean information that may be associated with a real person such as name, last name, date of birth and place of birth, phone number, motor vehicle license plate, social security number, passport number, curriculum vitae, picture, video and audio records, finger prints, e-mail address.

2. Legal Basis for Collecting Personal Data

Several laws regulate utilization of personal data of users. First and foremost, article 20 of the Constitution, Law on Regulation of Publications on the Internet and Suppression of Crimes Committed by means of Such Publications no. 5651 and the Law on the Protection of Personal Data no. 6698 and related legislation set forth principles for protection of personal data.

3. Our Principles for Processing Personal Data

The Company executes all personal data processing activities in accordance with the following principles.

- Compliance with the law and rules of integrity
- Being correct and current, as necessary
- Processing for specific, clear and legitimate purposes
- Being related, limited to purpose for which they are processed and moderate
- Storage as much as set forth at applicable legislation or needed for purpose for which they are processed

4. Our Personal Data Protection Applications

- All our personal data processing activities are in the scope of our policy. Such process includes processing personal or sensitive personal data of our customers, employees, suppliers and business partners.
- The Company;
 - takes necessary technical and administrative measures for ensuring suitable security level in order to prevent unlawful processing of personal data the company processes, to prevent unlawful access to data and to ensure protection of data and carries out necessary audits in this scope.

- stores personal data as much as set forth at the laws or needed for personal data processing purpose.
- performs information and clarification necessary in accordance with request of data subject.
- acts in conformity with regulations set forth at the law on the subject of transferring personal data in and out of organisation.
- holds trainings for the purpose of increasing awareness for protection of personal data, delegates responsibility and obligations to relevant persons.
- follows currency of data in accordance with information declared to VERBIS (Data Controllers Register System).

5. Personal Data Management Organisation

The Company carries out personal data management organisation in conjunction with Senior Management Representative, Committee for Personal Data Protection, all employees and necessary third parties.

6. Duties and Responsibilities

Committee for Personal Data Protection

- to designate Auditor for Personal Data Management and putting into practice actions by evaluating internal audit results
- to determine policy and procedures related to processing and protection of personal data, to identify risks, take action
- to manage applications of personal data subjects, to resolve these as final and ensure timely response to applications
- to ensure that personal data processing inventory is kept current and necessary notices are given to VERBIS

Contact Person

- to ensure communication to be established with organisation
- to manage complaints and requests from data subject, to keep record of process

Personal Data Protection Executive

- to ensure functionality of the Committee
- to found, operate and review Personal Data Management in line with the policy
- to carry out training and awareness activities related to personal data management

Auditor for Personal Data Protection Management

- to audit that personal data management is operated in conformity with applicable law and regulations
- to prepare periodical (annual, quarterly, monthly, etc.) audit plans, questionnaires and carry out audits
- to prepare audit report after an audit and submit it to Committee for Personal Data Protection

Data Protection Representatives

- to ensure that jobs done at department he represents are executed in conformity with Policy and Procedures for Personal Data Management
- to increase awareness related to security of personal data at department he represents
- to ensure accuracy, currency and security of personal data at department he represents, to report breach incidents to Personal Data Protection Executive

All Employees and Necessary Third Parties

- to follow any policy and procedures related to personal data management notified to them
- to report breaches and non-conformities to Personal Data Protection Executive or Data Protection Representative of his department

7. Rights of Data Subjects Pursuant to the Law on the Protection of Personal Data

We would like to remind you that pursuant to the Law on the Protection of Personal Data, you are entitled to;

- a. learn whether your personal data are processed
- b. request information, if processed
- c. learn purpose of processing and whether they are used as intended
- d. know 3rd parties they are transferred at home / abroad
- e. ask correction, if they are processed incomplete/wrong
- f. ask deletion/destruction under terms set forth at article 7 of the Law on the Protection of Personal Data
- g. ask notification of transactions made as per above mentioned sub-clauses (d) and (e) to 3rd parties to whom they are transferred
- h. object to emergency of an outcome against you due to analysis by automated systems exclusively
- i. demand indemnification of loss in the event you incur loss due to processing in violation of the Law on the Protection of Personal Data.

8. Policy update

We may review, modify or renew our policy and our way our processing personal information at various times. In case of an update, we will post current Policy at our internet site www.kaleaero.com. Renewed terms will enter into force as of date of posting.

Data Subjects have to complete Data Subject Application Form and submit their questions, opinions and demands in person or via registered mail with return receipt requester or to kh-kvkk@kaleaero.com. In this case, answer will be given in writing within 30 days.

Kale Havacılık San. A.Ş.

Last Update Date: 13.10.2020