

ASELSAN ELEKTRONİK SANAYİ VE TİCARET ANONİM ŞİRKETİ

PERSONAL DATA STORAGE AND DISPOSAL POLICY

Personal Data Storage and Disposal Policy

This Personal Data Storage And Disposal Policy (“**Policy**”) has been prepared by ASELSAN Elektronik Sanayi ve Ticaret Anonim Şirketi (“**ASELSAN**”) as the data controller in order to fulfil its obligations in accordance with the Personal Data Protection Law numbered 6698 (“**Law**”) and By-law on Deletion, Destruction or Anonymization of Personal Data to inform the data subjects regarding the principles of determining the maximum storage period for the purpose of processing their personal data and the deletion, destruction and anonymization processes.

Definitions

- **Explicit Content:** Freely given informed consent on a specific subject.
- **Data Subject:** Natural persons whose personal data are processed.
- **User Concerned:** Persons who process personal data within the organization of the data controller or upon authorization and instructions received from the data controller, excluding the person or department which is responsible for the technical storage, protection and back up of personal data,
- **Disposal:** Erasure, destruction or anonymization of personal data.
- **Recording Medium:** Any type of environment that keeps the personal data processed wholly or partially by automated means or non-automated means which provided that form part of a data filing system
- **Personal Data:** Any information relating to an identified or identifiable natural person,
- **Processing of Personal Data:** Any operation which is performed on personal data, wholly or partially by automated means or non-automated means which provided that form part of a data filing system, such as collection, recording, storage, protection, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization, preventing the use thereof.
- **Anonymization of Personal Data:** Rendering personal data impossible to link with an identified or identifiable natural person, even through matching them with other data.

- **Erasure of Personal Data:** Process of rendering personal data inaccessible and non-reusable for the users concerned, by no means.
- **Destruction of Personal Data:** process of rendering personal data inaccessible, irretrievable or non-reusable by anyone, by no means.
- **Board:** Personal Data Protection Board defined in the Law.
- **Periodic Disposal:** Erasure, destruction or anonymization process, which is determined in the personal data storage and disposal policy and carried out periodically ex officio, in the event that all of the conditions for processing laid down in the Law no longer exist.

Principles

ASELSAN acts in accordance with the following principles regarding the storage, erasure, destruction and anonymization of personal data:

- Personal data shall be erased, destructed or anonymized in accordance with the Law and the provisions of the relevant legislation, Board decisions and this Policy,
- All operations relating to erasure, destruction and anonymization of personal data shall be recorded and those records shall be stored for minimum two years Unless it is required to be stored for longer periods,
- Unless a contrary decision is taken by the Board, personal data will be disposed by ASELSAN at the end of the determined storage periods.
- Personal data shall be erased, destructed or anonymized by ASELSAN in the event that all of the conditions for processing laid down in Article 5 and Article 6 of the Law no longer exist.

In case of requests from ASELSAN for erasure, destruction or anonymization of personal data by the data subject, the requests submitted shall be answered within 30 (thirty) days at the latest. If the personal data, which are subject to the request, has been transferred to any third party in accordance with the ASELSAN Personal Data Protection and Processing Policy; the third party shall be notified of such request and ensured that necessary procedures are carried out within third parties.

Explanations on Reasons, which Require the Storage and Disposal of Personal Data

Personal data belonging to data subject is stored by ASELSAN, in particular for (i) sustainability of commercial activities, (ii) fulfilment of legal obligations, (iii) planning and execution of transactions regarding employee rights and benefits within the framework of the Law, other relevant legislation.

Furthermore, the reasons for the storage of Personal Data are as stated below.

- Storage of personal data as it is directly related to the establishment and performance of the contracts,
- Storage of personal data as it is necessary for the establishment, exercise or protection of any right,
- Storage of personal data is necessary for the legitimate interests pursued by ASELSAN, provided that this processing shall not violate the fundamental rights and freedom of the data subject,
- Storage of personal data is necessary for compliance with a legal obligation of ASELSAN,
- Storage of personal data is expressly provided for by the law,
- Having explicit content of data subjects for cases which explicit content is necessary for the storage of personal data.

In accordance with the By-Law, personal data of data subjects shall be disposed by ASELSAN in the cases listed below.

- Disposal of personal data is necessary due to the amendment or abolition of the provisions of relevant legislation which forms the basis for the processing or storage of personal data,
- Disposal of personal data is necessary as the reasons that require processing of personal data are no longer available
- Disposal of personal data is necessary to as the conditions listed in Article 5 and 6 of the Law on processing of personal data are no longer available
- Disposal of personal data is necessary as given explicit content has been withdrawn by the data subject in cases which it is mandatory,

- Disposal of personal data is necessary as the data subject's application for erasure, destruction or anonymization of personal data according to Article 11 of the Law is accepted by the data controller.
- Disposal of personal data is necessary If the Board accepts the data subject's claims which the data subject has alleged with complaint to the Board; in cases which the data controller rejects the application for erasure, destruction or anonymization of personal data or the answer of data controller is found insufficient or the data controller does not respond within the time period stipulated in Law.
- Disposal of personal data is necessary in cases, which the maximum period required for storage of personal data has passed and there are no conditions to justify the storage of personal data for a longer period of time.

Storage and Disposal Periods

ASELSAN will comply with the time periods prescribed by Law and provisions of other relevant legislation regarding storage and disposal of personal data. After the expiration of the time period which is stipulated in the legislation or if no time period is stipulated in the legislation, Personal Data will be processed within the scope of the following articles at the end of the time period that requires processing in accordance with ASELSAN's practices and general rules of commercial activities depending on the activity of ASELSAN while processing that data.

1. Personal data shall be classified as personal data and special categories of personal data based on the definition Article 6 of the Law. All data belonging to special categories shall be disposed. The method, which will be used in the disposal of the said data, shall be identified according to the qualification of the data and the importance of its storage to ASELSAN.
2. The compliance with the principles specified in Article 4 of the Law, and whether ASELSAN has a legitimate purpose in data storage is evaluated. Personal data, which is determined to be stored in violation of the principles in Article 4 of the Law shall be disposed.
3. Which of the exceptions stipulated in Articles 5 and 6 of the Law can be evaluated for storage of the personal data shall be identified. Reasonable time periods for storing

personal data shall be determined within the framework of exceptions identified. Personal Data shall be disposed if the said time periods expire.

After the expiry of storage periods for personal data determined by ASELSAN shall be disposed every 6 (six) months in accordance with the procedures prescribed in this Policy. All transactions regarding the disposal of personal data shall be recorded and those records shall be kept for at least 2 (two) years, excluding other legal obligations.

Procedures, Technical and Administrative Measures for the Storage and Disposal of Personal Data

Personal data are processed in the data storage system where it is required for ASELSAN's ability to fulfil its obligations arising from training or employment contracts, if it is mandatory for the establishment of a right, customer services, consumer rights and other opportunities, fulfilment of commercial, financial, legal responsibilities and obligations by ASELSAN, safety or legitimate interests of ASELSAN. Furthermore, all data stored as digital copies are saved on ASELSAN servers.

The administrative and technical measures taken by ASELSAN within the framework of the principles in Article 12 of the Law in order to keep your personal data securely, not to be processed illegally and to prevent unauthorized access and to dispose the data in accordance with the law are listed below.

Administrative Measures:

ASELSAN shall take the following administrative measures;

- ASELSAN limits the internal access to stored personal data to the personnel required to access it regarding their work definition. In restricting the access, whether the data is special category personal data shall also be taken into consideration.
- In case the processed personal data is obtained by others illegally, It will notify the data subject and the Board as soon as possible.
- Regarding transferring personal data, ASELSAN shall signs contracts or adds provisions to ensure data safety to existing contracts on protection of personal data and data security with parties which it transfers personal data.

- ASELSAN shall employ personnel, who are educated and experienced in personal data protection and provides necessary training within the scope of personal data protection legislation and data security to its personnel.
- ASELSAN carries out and has the necessary inspections made in order to ensure the implementation of the provisions of the Law before its own legal entity and removes the privacy and security vulnerabilities that arise as a result of the inspections.
- ASELSAN ensures that adequate security measures against situations such as electrical leakage, fire, flood, theft etc.) are taken according to the environment in which personal data is located and prevents unauthorized entry and exit to these environments.

Technical Measurements:

In terms of technical measurements, ASELSAN fulfills the responsibilities indicated herein;

- Acts in compliance with rules and procedures determined by the documents of internal regulations in ASELSAN; ASELSAN Information Security Document
- Conducts periodic security controls in the scope of ISO 27001 Information Security
- Provide employee training at least once in a year regarding awareness of information security in order adopt and reinforce it as corporate culture
- Manages risks and opportunities regarding information security and takes necessary measures to reduce the risks.
- Conducts central identity verifications, network access checks, anti-virus and port checks and any other information security controls.
- Ensures encrypted usage of sensitive data contained in portable computers and data storage devices.
- Restates the rights of the users whose job descriptions, title and work definitions are changed.
- Ensures network security and application security
- Uses secured networks preventing third party access and transfer of sensitive data
- Uses encryption and key methods
- Takes security measures in the scope of procurement, development and maintenance of information technology systems,
- Ensures keeping proper records of access logs
- Undertakes responsibilities for drafting and applying policies regarding information securities, access and use of information, storage and destruction process.
- Applies data masking where necessary

- Concludes Non Disclosure Agreements (NDA) with third parties for transactions involving sensitive and critical data
- Uses and centrally manages harmful software prevention programs to protect the system against harmful software threats
- Uses firewalls depending on security necessities when networks at different security levels are linked
- Ensures back up and security of personal data
- Monitors the operations of account management and authorization control system
- Keeps track of log records preventing user interference
- Uses attack detection and defend systems
- Applies data leakage tests
- Takes cybersecurity measures and monitors its implementations.
- Uses data backup programs to prevent data loss and ensures change of user passwords on regular basis for entering the system

Duties and Authorizations of the Personal Data Committee

The Personal Data Committee, which consists of senior executives of ASELSAN's relevant units, is responsible for informing relevant business units about the Policy, monitoring the fulfillment of its requirements, and all the work and transactions that need to be done in this process. You can contact the Personal Data Committee at kvk@aselsan.com.tr.

Enforcement Date of the Policy, Infringements and Sanctions

This Policy enters into force on the date it is published on ASELSAN's official website and becomes binding for ASELSAN employees, ASELSAN and natural or legal persons who process personal data on behalf of ASELSAN (Data Processor). Employees who infringe the Policy will be imposed to disciplinary procedures by ASELSAN.

You can submit your request to exercise your rights mentioned in Article 11 of the Law by completing the form given in www.aselsan.com.tr/en/PDP and sending a signed copy of your request to kvk@aselsan.com.tr or delivering it to ASELSAN Elektronik Sanayi ve Ticaret Anonim Şirketi at the address; Mehmet Akif Ersoy Mah. 296 Cad. No:16

Macunk y/Yenimahalle/Ankara with the required information to make your identity specific or through public notary or through other means described in Law or sending the form to aselsan@hs02.kep.tr with your secure electronic signature.

In case of a discrepancy between Turkish and English version of this Policy, the Turkish version shall prevail which is available on ASELSAN's official website (www.aselsan.com.tr/en/PDP).

Annex-1 Employee Title, Department and Job Description List

The list including title, department and work definition of the employees who are authorized for personal data processing in ASELSAN is kept confidential.