

ASELSAN ELEKTRONİK SANAYİ VE TİCARET ANONİM ŞİRKETİ
PERSONEL DATA PROTECTON AND PROCESSING POLICY
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1. INTRODUCTION

ASELSAN Elektronik Sanayi ve Ticaret Anonim Şirketi (“**ASELSAN**”) gives utmost care and attention to lawfully processing and protection of personal data as required in the Personal Data Protection Law numbered 6698 (“**Law**”) and for this reason it is ensured that your data is protected at all times in any plan and operation carried out by ASELSAN. In this aspect, your personal data shall be protected in compliance with the Personal Data Protection and Processing Policy (“**Policy**”).

1.1. Purpose of the Policy

The fundamental purpose of the Policy hereby, is to explain the systems regarding data processing, protection and informing data subjects whose data is processed by ASELSAN. Thus, it is aimed that personal data processing and protection activities carried out by ASELSAN is fully compliant with the Law and that all the rights of data subjects as per the Law is fully protected.

1.2. Enforcement Date of the Policy

The up to date Policy shall be made available to the related persons through publishing it on ASELSAN’s official website (www.aselsan.com.tr/en/PDP). ASELSAN, reserves the right to make amendments on the Policy.

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).

1.3. Scope of the Policy and Data Subjects

This Policy has been prepared by ASELSAN for those whose personal data is processed through automated or non-automated means provided that form part of a data filing system.

ASELSAN Share Holders	Natural persons who own shares in ASELSAN.
ASELSAN Business Partners’ Share Holders, Authorized Persons, Employee	Every natural person including share holders, authorized persons and employees of natural persons or legal

	persons that have any kind of business relations (business partners, suppliers etc.) with ASELSAN.
Candidate Employee	Persons who applied for a job in ASELSAN by any means or provided ASELSAN with their curriculum vitae or related personal information.
Intern, Candidate Intern, Scholarship Holder, Applicant Scholarship Holder	Persons who have applied for internship, vocational training or scholarship programs in ASELSAN or provided ASELSAN with their curriculum vitae or related personal information.
Coordinator, Instructor, Faculty Member	Persons who supervise students continuing on the programs such as internship, vocational training of or any other educational programs.
ASELSAN Customer or Potential Customer	Persons who buy or requested to buy goods and services provided by ASELSAN.
Visitor	Natural persons who for whatever purpose visit ASELSAN premises, or website.
Third Party	Other natural persons who do not fall in any of the data subject category within the scope of this Policy.

1.4. Application of the Policy

This Policy has been prepared to materialize the rules set out in the Law for ASELSAN's practice.

2. PROCESSING AND TRANSFER OF PERSONAL DATA

2.1. General Principles on Processing Personal Data and Special Category Personal Data

ASELSAN shall process personal data in accordance with the rules and procedures stated in the Law and in this Policy. ASELSAN acts in line with the principles set out in the Law when processing personal data.

2.2. Conditions for Processing Personal Data and Special Category Personal Data

ASELSAN shall process personal data under the conditions stated in the Law. ASELSAN takes adequate measures determined by the Board of Personal Data Protection.

2.3. Conditions for Transfer of Personal Data in Turkey and Abroad

ASELSAN abides by the principles and meets the conditions provided in the Law in terms of transfer of personal data. ASELSAN transfers personal data, including special category personal data as per the Law to third parties by taking necessary security measures in accordance with the purpose of processing personal data.

3. PERSONAL DATA CATEGORIES, PURPOSE OF PROCESS AND TRANSFER, THIRD PARTIES TO WHOM PERSONAL DATA CAN BE TRANSFERRED

3.1. Personal Data Categories

The personal data indicated herein shall be processed by ASELSAN under the conditions as required by the Law.

PERSONAL DATA	SCOPE
Personal Identity Information	Information clearly relating to identified or identifiable natural persons and processed wholly or partially through automated or non-automated means provided that form part of a data filing system such as personal identity information; including documents (passport, national identity card etc.) containing information; Turkish Identity Number, nationality, parents' name, place of birth and date of birth, gender, tax number, Turkish Social Security (SGK) number, signature, secure electronic signature and license plate.
Contact Information	Information clearly relating to identified or identifiable natural persons and processed wholly or partially through automated or non-automated means provided that form part of a data filing system such as contact details, address, e-mail address, fax number and IP address.
Location Information	Information clearly relating to identified or identifiable natural persons and processed wholly or partially through automated or non-automated means provided that form part of a data filing system such as GPS location data and travel information collected within the scope of the activities and transactions carried out by ASELSAN

Transaction Security Information	Personal data regarding data subjects or ASELSAN's technical, administrative, financial and legal or commercial security.
Family Member and Relative Information	Information clearly relating to identified or identifiable natural persons and processed wholly or partially through automated or non-automated means provided that form part of a data filing system such as information regarding family members, relatives, emergency contact details collected within the scope of the activities and transactions carried out by ASELSAN or for the purpose of protecting legal rights and interests of data subjects.
Premise Security Information	Information clearly relating to identified or identifiable natural persons and processed wholly or partially through automated or non-automated means provided that form part of a data filing system such as camera records taken during entry into premises, inside the premises for the duration of stay, finger prints and other records or copies of documents taken at the security points.
Financial Information	Information clearly relating to identified or identifiable natural persons and processed wholly or partially through automated or non-automated means provided that form part of a data filing system such as processed information, documents or records showing any financial outcome generated as per the status of the legal relations established between ASELSAN and Data Subject, bank credit cards, financial states, assets and income states.,
Visual and Audio Information	Information clearly relating to identified or identifiable natural persons such as photographs, camera and voice records and data included in the copies of the documents containing personal data.
Employee Personal Information	Information clearly relating to identified or identifiable natural persons and processed wholly or partially through automated or non-automated means provided that form part of a data filing system such as any personal data forming the basis of fundamental rights of the natural persons who are in employment relationship with ASELSAN.
Legal Operations Information	Data processed within the scope of ASELSAN's legal rights and obligations.

Special Category Personal Data	Information stated in Article 6 of the Law clearly relating to identified or identifiable natural persons and processed wholly or partially through automated or non-automated means provided that form part of a data filing system.
Request or Complaint Management Information	Information clearly relating to identified or identifiable natural persons which processed wholly or partially through automated or non-automated means provided that form part of a data filing system such as personal data regarding the evaluation of all the requests and complaints submitted to ASELSAN.
Customer Information	Personal data regarding natural persons collected and produced because of the operations and transactions of ASELSAN.
Customer Transaction Information	Information on the usage of goods and services produced in ASELSAN and instructions or requests necessary for customers' usage of those goods and services.
Candidate Employee Information	Data relating to persons who have applied for a job in ASELSAN.
Candidate Intern or Scholar Information	Data relating to persons who have applied for internship, vocational training or scholarship programs in ASELSAN.
Internal Audit Information	Data collected within the scope of internal audit and surveillance operations conducted in ASELSAN.

3.2. Purpose of Processing and Transfer of Personal Data

ASELSAN shall process personal data within the framework of the following purposes without limitation and in accordance with the principles and under the conditions stated in the Law;

- Planning and implementing human relations policies,
- Full performance of obligations undertaken as per the relevant laws, by-laws, purchase orders or contracts,
- Planning, operating and managing business partnerships and strategies,
- Providing and maintaining legal, commercial and physical security of ASELSAN, its shareholders, affiliates, subsidiaries and other business partners,
- Maintaining and operating corporate actions, planning, executing and managing administrative and communication activities,
- Ensuring data security at the highest level,

- Forming databases,
- Developing services offered to customers through ASELSAN's official website and rectifying errors associated with the website,
- Contacting data subjects who have made a request and managing all requests,
- Planning, conducting and managing activities,
- Planning, operating and managing relations with suppliers and other shareholders,
- Planning, operating and managing recruitment processes,
- Executing and managing the course of financial reporting and risk management processes,
- Operation and management of all legal processes,
- Works conducted to preserve ASELSAN's reputation,
- Planning, operating and managing investor relations,
- Providing information to the authorized public institutions and organizations,
- Keeping track of records of visitors.

3.3. Third Parties to Whom Personal Data Can Be Transferred

Personal Data can be transferred by ASELSAN in accordance with the principles and under the conditions set out by the Law to ASELSAN's Shareholders, Affiliates, Subsidiaries, Other Business Partners, Suppliers, Public Institutions and Organizations and other third parties where it is relevant.

4. LEGAL PURPOSE AND METHODS FOR COLLECTING PERSONAL DATA, DISPOSAL PROCESS AND STORAGE PERIOD

4.1. Legal Purpose and Methods for Collecting Personal Data

Personal Data can be collected through any means of verbal or written electronic platform such as call center, ASELSAN's official website, mobile application and other methods in order to achieve the purposes set out in this Policy or to exercise rights and perform obligations and processed by ASELSAN.

4.2. Disposal of Personal Data

If, in despite of processing personal data compliant with the provisions of the Law and other applicable laws, the reasons that require processing of personal data are no longer available,

ASELSAN shall dispose of the personal data or shall do so upon request of the data subject within the terms and conditions as required in the Law. Rules and procedures for destruction of personal data is laid out in Personal Data Storage and Disposal Policy.

4.3. Personal Data Storage Period

Personal Data shall be stored by ASELSAN for the periods stipulated in the legislations and for the period determined in accordance with the activities carried out by ASELSAN in case where no time period has been prescribed. Personal Data shall be disposed by ASELSAN, at the expiry of the storage period. Principles and procedures regarding storage time period of personal data is set out in Personal Data Storage and Destruction Policy.

5. PROTECTION OF PERSONAL DATA

Personal Data shall be protected by ASELSAN within the framework of the principles and under the conditions provided in the Law. ASELSAN shall take all the necessary technical and administrative measures to prevent the unlawful processing and access of Personal Data to ensure protection of data in appropriate security level and in this extent conducts adequate supervision of the systems. In case Personal Data is unlawfully accessed and taken into possession of others, ASELSAN acts in line with the process stated in the Law.

6. RIGHT OF DATA SUBJECTS, EXERCISE OF RIGHTS AND EVALUATION

6.1. INFORMING THE DATA SUBJECT

ASELSAN informs Data Subjects on the purpose and procedure of processing personal data, storage and disposal within the framework of the principles and procedures set out in the Law. You can get access to ASELSAN's Information Note on Protection of Personal Data on the website (www.aselsan.com.tr/en/PDP).

6.2. Legal Rights of Data Subject Stated in the Law

The information note provided to data subject on the purpose, rules and procedure of processing personal data, storage and disposal shall include the rights of the data subject indicated in the Law.

6.3. Exercise of Rights of Data Subject

As indicated in the first paragraph of Article 13 titled “Application to Data Controller”, you can submit any request to ASELSAN in writing or through other means determined by the Board of Personal Data Protection. In this aspect, please submit your application to ASELSAN following the procedures below:

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 Macunköy/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.

6.4. Response Procedure of ASELSAN

ASELSAN shall conclude requests in the application free of charge and as soon as possible depending on the nature of the request and within thirty (30) days at the latest. However if the action requires an extra cost, fees may be charged in the tariff determined by the Board. ASELSAN may accept or reject the request with a reasoned response and notifies the data subject in writing or through electronic means. If the request in the application is accepted, ASELSAN does as required.

6.5. The Right to Complaint to the Board of Personal Data Protection

If the application is rejected, the response is found inadequate or the request is not responded within the specified time period, the data subject may submit a complaint with the Board of Personal Data Protection within thirty (30) days as of the date the response of the data controller is known about or within sixty (60) days as of date of request, in any case.

7. UPDATES, COMPLIANCE AND AMENDMENTS

ASELSAN reserves the right to make updates and amendments in this Policy and any other policy in relation with and is subject to this Policy.