

HEDEF HOLDİNG A.Ş.

PERSONAL DATA PROTECTION AND PRIVACY POLICY

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HEDEF HOLDİNG A.Ş.

PERSONAL DATA PROTECTION AND PRIVACY POLICY

1. INTRODUCTION

As Hedef Holding A.Ş. ("Hedef Holding" or the "Company"), since the enactment of Law No. 6698 on the Protection of Personal Data ("KVKK" or the "Law"), we attach great importance to the protection of personal data belonging to all real persons with whom we come into contact in any way while carrying out our commercial activities and to fully comply with the requirements set out in the KVKK.

This Personal Data Protection and Privacy Policy (the "Policy") has been prepared to inform you about the processes and principles regarding the collection, use, sharing, and storage of personal data by Hedef Holding. The principles regarding the processing of personal data belonging to data subjects by Hedef Holding are included in this Policy in accordance with the order of the provisions set out in the KVKK. These explanations cover our Hedef Holding employees, active and potential customers, visitors, and other real persons who are in contact with Hedef Holding.

2. PROCEDURES AND PRINCIPLES REGARDING THE PROTECTION OF PERSONAL DATA

A. DEFINITIONS

Explicit Consent: The consent that is related to a specific issue, based on information, and expressed with free will.

Anonymization: Rendering personal data in such a way that it can no longer be associated with an identified or identifiable person, even when matched with other data.

Data Subject: The real person whose personal data is processed.

Law/KVKK: Law No. 6698 on the Protection of Personal Data.

Personal Data: Any information relating to an identified or identifiable real person.

Processing of Personal Data: Any operation which is performed on personal data such as collection, recording, storage, preservation, alteration, reorganization, disclosure, transfer, acquisition, making available, classification, or preventing the use thereof, wholly or partly by automatic means or otherwise than by automatic means which form part of a data recording system.

Board: The Personal Data Protection Board.

Data Processor: The real or legal person who processes personal data on behalf of the data controller based on the authority given by the data controller.

Data Recording System: The recording system in which personal data are processed by structuring according to specific criteria.

Data Controller: The real or legal person who determines the purposes and means of the processing of personal data and is responsible for establishing and managing the data recording system.

B. GENERAL PRINCIPLES REGARDING THE PROCESSING OF PERSONAL DATA

Hedef Holding processes personal data in compliance with the procedures and principles stipulated in the KVKK and other relevant laws. Accordingly, Hedef Holding fully adheres to the following principles outlined in the KVKK while processing personal data:

- **Lawfulness and Conformity with Rules of Bona Fides:** Under this principle, Hedef Holding conducts its data processing activities in line with all relevant legislation, primarily the Constitution of the Republic of Turkey and KVKK, within the bounds of bona fides.
- **Accuracy and Being Up to Date, Where Necessary:** Hedef Holding takes necessary measures to ensure that the personal data it processes are accurate and up-to-date and provides opportunities for data subjects to update their information to reflect the true situation.
- **Processing for Specified, Explicit, and Legitimate Purposes:** Hedef Holding processes personal data only for clearly defined, legitimate purposes and does not engage in data processing activities beyond these purposes. In this context, Hedef Holding processes personal data only in connection with and as necessary for the relationship established with data subjects.
- **Being Relevant, Limited, and Proportionate to the Purposes for Which They are Processed:** Hedef Holding processes data in a manner that is adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed, in accordance with KVKK and other relevant legislation. It avoids processing personal data that is not required.
- **Being Retained for the Period of Time Stipulated by Relevant Legislation or the Purpose for Which They are Processed:** Personal data processed by Hedef Holding are retained only for the period stipulated by relevant legislation or as required for the purpose for which they are processed. In this context, if there is a period stipulated for the retention of data in the relevant legislation, Hedef Holding complies with this period; if there is no such period, data is retained only for the necessary duration for the purpose for which it is processed.

C. CONDITIONS FOR PROCESSING PERSONAL DATA

Hedef Holding processes personal data under the following conditions:

Hedef Holding processes personal data by obtaining the explicit consent of data subjects, except for the exceptions listed in the KVKK. In the presence of the following conditions specified in the KVKK, personal data can be processed without the explicit consent of the data subject:

- Explicitly stipulated by law,
- Necessary to protect the life or physical integrity of the person or another person, who is unable to express their consent due to actual impossibility or whose consent is not legally recognized,
- Necessary for the processing of personal data of the parties to a contract, provided that it is directly related to the establishment or performance of that contract,
- Necessary for the data controller to fulfill its legal obligation,
- Made public by the data subject,
- Necessary for the establishment, exercise, or protection of a right,
- Necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

For data processing activities and data categories that require obtaining the explicit consent of the data subject to carry out Hedef Holding's commercial activities, explicit consent declarations have been prepared. In the explicit consent declarations prepared for data subjects, in parallel with the European Union regulations that form the basis of the KVKK, data subjects are given the choice to decide whether their personal data can be processed by Hedef Holding and are informed about the potential consequences in case explicit consent cannot be obtained.

D. PURPOSES OF PROCESSING PERSONAL DATA

Personal data obtained by Hedef Holding can be processed within the scope of the following purposes:

- Planning and Execution of Business Activities
- Management and Supervision of Relationships with Subsidiaries
- Execution of Corporate and Partnership Law Transactions
- Ensuring the Accuracy and Up-to-Date Nature of Data
- Planning and Execution of Corporate Communication Activities
- Management and Supervision of Relationships with Subsidiaries
- Planning and Execution of Occupational Health and Safety Processes
- Supply, Placement, and Operation Processes for Interns and Students
- Management of Relationships with Business Partners and Suppliers
- Planning and Execution of Benefits and Fringe Benefits for Employees
- Performance and Employee Satisfaction Management
- Execution of Personnel Procurement Processes
- Ensuring the Accuracy and Up-to-Date Nature of Data
- Planning and Execution of Emergency Management Processes
- Monitoring of Finance and Accounting Affairs
- Planning of Recruitment and Personnel Affairs Processes
- Planning and Execution of Corporate Sustainability Activities
- Planning and Execution of Business Continuity Activities
- Monitoring of Contract Processes and Legal Claims
- Planning and Execution of Employees' Access Rights to Information Systems

D. PURPOSES OF PROCESSING PERSONAL DATA

The personal data obtained by Hedef Holding can be processed within the following scopes:

- Planning and Execution of Business Activities
- Management and Supervision of Relationships with Subsidiaries
- Execution of Corporate and Partnership Law Transactions
- Ensuring the Accuracy and Up-to-Date Nature of Data

- Planning and Execution of Corporate Communication Activities
- Management and Supervision of Relationships with Subsidiaries
- Planning and Execution of Occupational Health and Safety Processes
- Supply, Placement, and Operation Processes for Interns and Students
- Management of Relationships with Business Partners and Suppliers
- Planning and Execution of Benefits and Fringe Benefits for Employees
- Performance and Employee Satisfaction Management
- Execution of Personnel Procurement Processes
- Ensuring the Accuracy and Up-to-Date Nature of Data
- Planning and Execution of Emergency Management Processes
- Monitoring of Finance and Accounting Affairs
- Planning of Recruitment and Personnel Affairs Processes
- Planning and Execution of Corporate Sustainability Activities
- Planning and Execution of Business Continuity Activities
- Monitoring of Contract Processes and Legal Claims
- Planning and Execution of Employees' Access Rights to Information Systems

The categories listed above are provided for informational purposes, and personal data may be processed for other purposes in the future to carry out Hedef Holding's commercial and operational activities. In such cases, the categories in this Policy will be updated periodically by Hedef Holding.

E. STORAGE OF PERSONAL DATA

The personal data obtained is securely stored in physical or electronic environments for an appropriate duration to carry out Hedef Holding's commercial activities. Within the scope of these activities, Hedef Holding complies with all obligations stipulated in KVKK and other relevant regulations regarding the protection of personal data. Unless a longer retention period is permitted or required by the relevant legislation, personal data will be deleted, destroyed, or anonymized by Hedef Holding when the purpose of processing these data ceases, in accordance with Hedef Holding A.Ş.'s Personal Data Retention and Destruction Policy, which is prepared in compliance with this Policy. Personal data will be rendered completely unusable and irretrievable if destroyed by various methods.

However, in cases where the data controller has a legitimate interest, personal data may be stored for up to the statute of limitations period (ten years) stipulated in the Turkish Code of Obligations, provided that it does not harm the fundamental rights and freedoms of data subjects, even after the purpose of processing and the periods specified in the relevant laws have expired. After the expiration of the statute of limitations, personal data will be deleted, destroyed, or anonymized following the procedures mentioned above.

F. TRANSFER OF PERSONAL DATA TO DOMESTIC PARTIES

Hedef Holding carefully adheres to the conditions stipulated in KVKK when sharing personal data with third parties, without prejudice to the provisions of other laws. Accordingly, personal data is not transferred to third parties by Hedef Holding without the explicit consent of the data subject.

However, personal data may be transferred without the explicit consent of the data subject if one of the following conditions stipulated in KVKK is met:

- Explicitly stipulated by laws,
- Necessary for the protection of life or physical integrity of the person or another person who is incapable of giving consent due to actual impossibility or whose consent is not legally valid,
- Necessary for the execution or performance of a contract directly related to the personal data,
- Necessary for the data controller to fulfill its legal obligation,
- Personal data made public by the data subject,
- Necessary for the establishment, use, or protection of a right,
- Necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

G. TRANSFER OF PERSONAL DATA ABROAD

In accordance with Article 9 of the KVKK, explicit consent of the data subject is required for the transfer of personal data abroad. However, if the conditions for processing personal data without explicit consent, including sensitive personal data, are met, personal data may be transferred abroad by Hedef Holding without the data subject's explicit consent, provided that there is sufficient protection in the foreign country where the personal data will be transferred. If the country where the transfer will be made is not among those with adequate protection determined by the Board, adequate protection will be committed in writing by Hedef Holding and the data controller/data processor in the relevant foreign country.

You can find the list of groups to whom/which your personal data are shared or may be shared in Appendix 2 of this Policy. This list is prepared for informational purposes and will be updated by Hedef Holding in case of any changes.

H. Hedef Holding's OBLIGATION TO INFORM

Under Article 10 of the KVKK, data subjects must be informed before or at the time their personal data is collected. The following information must be provided to data subjects within the scope of the obligation to inform:

- The identity of the data controller and its representative, if any,
- The purposes for which personal data will be processed,
- To whom and for what purposes the processed personal data can be transferred,
- The method and legal basis of personal data collection,
- Other rights listed in Article 11 of the KVKK.

Hedef Holding fulfills its obligation to inform in every case where personal data is processed. For this purpose, information statements have been prepared and implemented based on the process and data subject category.

On the other hand, under Article 28(2) of the KVKK, Hedef Holding is not obliged to inform in the following cases:

- When the processing of personal data is necessary for the prevention of crime or criminal investigation,
- When the personal data has been made public by the data subject,
- When the processing of personal data is necessary for the performance of supervisory or regulatory duties and the functioning of disciplinary investigations or prosecutions by the authorized public institutions and organizations and professional organizations that have public institution status, based on the authority granted by law,
- When the processing of personal data is necessary for the protection of the State's economic and financial interests related to budget, tax, and financial matters.

Hedef Holding fulfills its obligation to inform within a reasonable time after the personal data is obtained, if the personal data is not obtained from the data subject. If the personal data will be used to communicate with the data subject, the obligation to inform is fulfilled at the latest at the first communication with the data subject. If the personal data is to be transferred, the obligation to inform is fulfilled at the time of transfer.

I. RIGHTS OF THE DATA SUBJECT

Hedef Holding has taken the necessary measures to ensure that the rights granted to data subjects under Article 11 of the KVKK regarding their personal data processed in accordance with the principles in this Policy are exercised. These rights are as follows:

- a) To learn whether personal data is processed or not,
- b) To request information if personal data is processed,
- c) To learn the purpose of processing personal data and whether they are used in accordance with their purpose,
- d) To know the third parties to whom personal data is transferred, in the country or abroad,
- e) To request the correction of personal data if it is incomplete or incorrectly processed,
- f) To request the deletion or destruction of personal data within the framework of the conditions stipulated in Article 7 of the KVKK,
- g) To request notification of the transactions made under (e) and (f) to third parties to whom personal data has been transferred,
- h) To object to the occurrence of a result against the person himself/herself by analyzing the processed data exclusively through automated systems,
- i) To request compensation for the damage arising from the unlawful processing of personal data.

Data subjects can exercise the above rights by sending a wet-signed copy of the data subject application form found in Appendix 1 of this Policy, along with a photocopy of their identity card, to the General Directorate of Hedef Holding by registered mail with return receipt requested. Detailed information on filling out and sending the form to Hedef Holding is provided in the application form

found in Appendix 1. Hedef Holding will deliver the response to the relevant data subject physically or electronically.

Hedef Holding will conclude the request free of charge as soon as possible and within no later than thirty (30) days depending on the nature of the request. However, if the transaction requires an additional cost, Hedef Holding will charge the fee specified in the tariff determined by the Board. In addition, Hedef Holding may request additional information or documents from the applicants during the process of concluding the data subject's requests.

Meanwhile, under Article 28(2) of the KVKK, except for the right to request compensation for damages, the above rights listed in Article 11 of the KVKK cannot be exercised in the following cases:

- If personal data processing is necessary for the prevention of crime or criminal investigation,
- If personal data processing is related to personal data made public by the data subject,
- If personal data processing is necessary for the execution of supervisory or regulatory duties and for disciplinary investigations or prosecutions by the authorized public institutions and organizations and professional organizations with public institution status, based on the authority granted by law,
- If personal data processing is necessary for the protection of the economic and financial interests of the State related to budget, tax, and financial matters.

J. MEASURES TAKEN FOR DATA SECURITY

Hedef Holding takes all necessary technical and administrative measures to ensure the appropriate level of security for the protection of personal data, as required under Article 12(1) of the KVKK.

The measures taken by Hedef Holding in this context are listed below:

Administrative Measures;

- Within the company, the principle of "all transactions related to personal data are prohibited unless necessary" is implemented with necessary technical measures. Access to stored personal data within the company is limited to personnel who need access for their job description. The sensitivity and importance level of the data are also considered when limiting access.
- Necessary technical measures are taken to prevent unlawful access to processed personal data, and if such access occurs, the situation is promptly reported to the relevant person and the Board.
- Framework agreements or additional clauses to existing contracts are used to ensure data security when sharing personal data with third parties.
- Experienced and knowledgeable personnel on personal data processing are employed, and necessary and up-to-date training is provided to employees on personal data protection legislation and data security.
- Regular inspections are conducted within the company's legal entity to ensure compliance with the Law. Any identified privacy and security weaknesses are addressed, considering the nature and degree of confidentiality required for the personal data and the potential harm that could result from a security breach.

- The accuracy of processed personal data is regularly checked, and unnecessary personal data is securely destroyed under the data retention and destruction policy.

Technical Measures;

- Necessary internal controls are carried out within the systems established to monitor personal data security and data backup strategies are developed to protect against malicious software.
- Information technology risk assessments and business impact analyses are performed as part of the systems.
- The necessary technical infrastructure to prevent or monitor data leaks is established and related matrices are created. Necessary software to ensure cybersecurity (including network security, application security, antivirus systems) is maintained and updated regularly.
- Penetration testing services are obtained regularly and as needed to check system vulnerabilities.
- Access rights to personal data for employees in information technology units are kept under control.
- Personal data is destroyed in a way that is irreversible and leaves no audit trail.
- Under Article 12 of the Law, all digital environments where personal data is stored are protected with encryption or cryptographic methods that meet information security requirements. Necessary physical security measures are taken for personal data stored in physical environments, and entry-exit records are maintained.

K. REGARDING SPECIAL CATEGORIES OF PERSONAL DATA

Hedef Holding shows special sensitivity in the processing of special categories of personal data, which are considered to be of critical importance for the protection of data subjects. Under the condition of taking the necessary precautions determined by the Board, such data is processed without the explicit consent of the data subjects. However, special categories of personal data other than those related to health and sexual life may be processed without explicit consent in cases stipulated by law. Data related to health and sexual life can be processed without explicit consent for the following purposes, provided that adequate precautions are taken, by persons or authorized institutions and organizations under the obligation of secrecy:

- Protection of public health,
- Preventive medicine,
- Medical diagnosis,
- Provision of treatment and care services,
- Planning and management of health services and financing.

The sharing of special categories of personal data with third parties will also be possible, provided that the necessary precautions are taken.

In addition to the administrative and technical measures foreseen for personal data in this Policy, the following additional measures are taken for the processing, storage, and/or access to special categories of personal data:

In electronic environments where special categories of personal data are processed, stored, and/or accessed:

- a) All actions performed on the data are securely logged.
- b) Security updates for the environments where the data is stored are continuously monitored, necessary security tests are regularly performed, and the test results are recorded.
- c) If access to the data is through a software application, user authorizations for the software are made and recorded.
- d) In cases where remote access to the data is necessary, at least two-factor authentication systems are provided.

In physical environments where special categories of personal data are processed, stored, and/or accessed:

- a) Adequate security measures are taken according to the nature of the environment where the special categories of personal data are kept.
- b) Physical security is ensured for these environments to prevent unauthorized access.

If special categories of personal data are to be transferred to third parties:

- a) If the data needs to be transferred via email, it is sent in an encrypted form using a corporate email address or Registered Electronic Mail (KEP) account.
- b) If the data needs to be transferred via portable media such as USB drives, CDs, or DVDs, it is encrypted using cryptographic methods, and the cryptographic key is stored in a different location.
- c) If the transfer is between servers in different physical environments, the data transfer is done by establishing a VPN between the servers or using the sFTP method.
- d) If the data needs to be transferred in paper form, necessary precautions are taken against risks such as theft, loss, or unauthorized viewing of the document, and the document is sent in the format of "confidential documents."

These measures ensure that special categories of personal data are protected and securely handled during any transfer processes, maintaining the confidentiality and integrity of the data.

3. OTHER ISSUES

- In the event of any inconsistency between the KVKK and other relevant legislation and this Policy, the provisions of the KVKK and other relevant legislation shall prevail.
- This Policy prepared by Hedef Holding was put into effect by the decision of the Board of Directors of Hedef Holding A.Ş. dated December 3, 2019, and numbered 504.
- In the event of any changes to this Policy, the effective date of the Policy and the relevant articles will be updated accordingly.

4. APPENDICES

APPENDIX – 1

HEDEF HOLDİNG A.Ş.

DATA SUBJECT APPLICATION FORM

1. GENERAL

This Application Form has been prepared by Hedef Holding A.Ş. (“Hedef Holding” or the “Company”) in the capacity of data controller, in order to promptly, effectively, and comprehensively evaluate and resolve the applications to be made by you data subjects pursuant to Articles 11 and 13 of the Law on the Protection of Personal Data No. 6698 (“KVKK”).

2. APPLICATION METHOD

You, as data subjects, may submit your requests regarding the implementation of the KVKK to our Company, which holds the status of data controller, by filling out this Application Form in writing or by other methods to be determined by the Board, pursuant to Articles 11 and 13 of the KVKK:

You can send a signed copy of this Application Form, along with a photocopy of your ID, to the address Saray Mah. Dr. Adnan Büyükdeniz Cad. 2. Blok Cessas Plaza, No:4, İç Kapı No:7, Ümraniye/Istanbul via registered mail with return receipt.

3. INFORMATION REGARDING THE DATA SUBJECT

In order to conduct the necessary research and evaluations regarding your application and to develop solutions related to the matter, you are required to fill out the fields below accurately and completely:

- Full Name*:

- Turkish ID Number:

- For Foreigners, Nationality, Passport No/If Any, Identity No*:

- Address*:

- Phone Number*:

- Email Address*:

- Fax Number:

*Mandatory fields.

The personal data you have provided to us above is processed solely for the purpose of evaluating, concluding, and communicating with you regarding this Application Form.

Indicate the nature of your relationship with Hedef Holding by selecting the appropriate option below and specify whether the current relationship is ongoing:

Customer	<input type="checkbox"/>	Employee Candidate	<input type="checkbox"/>
Business Partner	<input type="checkbox"/>	Employee	<input type="checkbox"/>
Visitor	<input type="checkbox"/>	Other	<input type="checkbox"/>

Specify the status of your relationship with Hedef Holding as of the application date:

- My relationship with Hedef Holding is ongoing as of the application date.
- My relationship with Hedef Holding ended on _____ (specify the date).

4. DATA SUBJECT'S REQUESTS

As a data subject, please mark the relevant box(es) from the list below for the situation(s) you wish to be informed about under Articles 11 and 13 of the KVKK.

Your Request	Required Information / Document	Your Choice
1. I want to know whether my personal data is being processed by Hedef Holding.	If you would like to obtain information about a specific type of data, please specify.	
2. I would like to know the purposes for which my personal data are being processed by Hedef Holding.	If you would like to obtain information about a specific type of data, please specify.	
3. I would like to know if my personal data are being used appropriately in line with the purposes specified by Hedef Holding.	If you would like to obtain information about a specific type of data, please specify.	
4. I would like to know the third parties to whom my personal data are being transferred domestically or internationally, if applicable.	If you would like to obtain information about a specific type of data, please specify.	
5. I believe my personal data is being processed incompletely or incorrectly, and I request that they be corrected.	Please specify the information you believe has been processed incorrectly or inaccurately and how it should be corrected.	
6. I request that my personal data, which I believe is being processed incompletely or incorrectly, be corrected by the third parties to whom it has been transferred.	Please specify the information you believe has been processed incorrectly or inaccurately and how it should be corrected.	

<p>7. I request the deletion/destruction of my personal data due to the elimination of the reasons requiring their processing.*</p>	<p>Please specify which data is the subject of this request and the result you believe is unfavorable to you. Include any supporting information and documents related to these issues with the Application Form.</p> <p>.....</p>	
<p>8. I request the deletion/destruction of my personal data by third parties to whom my data was transferred due to the elimination of the reasons requiring their processing.**</p>	<p>Please specify which data this request pertains to if it relates only to a portion of your personal information and provide the justification for this request, including any supporting information and documents related to these issues. Attach this supporting information and documents to the Application Form.</p> <p>.....</p>	
<p>9. I believe that my personal data processed by Hedef Holding has been exclusively analyzed through automated systems, resulting in a conclusion that is unfavorable to me. I object to this conclusion.</p>	<p>Please state the reason for this request and the outcome of the situation regarding your information request. Include any supporting information and documents related to these issues in the attachment to the Application Form.</p> <p>.....</p> <p>.....</p> <p>.....</p>	
<p>10. I request compensation for the damages I have suffered due to the unlawful processing of my personal data.</p>	<p>Please state the reason for this request and the damage you believe you have suffered in the space below; include any supporting information and documents related to these issues (e.g., decisions by the Personal Data Protection Board or court rulings) in the attachment to the Application Form.</p> <p>.....</p>	

*In accordance with Article 7/3 of the KVKK, the procedures and principles stipulated in the Regulation on the Deletion, Destruction, or Anonymization of Personal Data are reserved.

**In accordance with Article 7/3 of the KVKK, the procedures and principles stipulated in the Regulation on the Deletion, Destruction, or Anonymization of Personal Data are reserved.

In cases where applications are made by third parties on behalf of the data subject, a notarized power of attorney must be submitted along with this Application Form. For applications made on behalf of children under custody/guardianship, a copy of documents proving the custody/guardianship relationship must be sent to us along with this Application Form.

To ensure the security of your personal data, within seven (7) days from the date your information request reaches Hedef Holding, Hedef Holding may contact you to verify your identity as the data subject and may request certain information and documents from you for this purpose. The information and documents you provide will be immediately destroyed upon verification of your identity.***

If the requested information and documents are incomplete, you will need to provide the missing information and documents upon our request. The thirty (30) day period specified in Article 13/2 of the KVKK for the conclusion of the request will be suspended until the complete information and documents are submitted to us.

*** Pursuant to Article 7/3 of the KVKK, the procedures and principles stipulated by the Regulation on the Deletion, Destruction, or Anonymization of Personal Data shall be reserved.

5. RESOLUTION OF THE DATA SUBJECT'S REQUEST

Depending on the nature of your request, it will be resolved in accordance with the Personal Data Protection legislation in an effective, lawful, and fair manner, and you will be responded to as soon as possible and at the latest within thirty (30) days following the date it reaches us. Our responses and assessments will be delivered to you in writing or electronically as specified in Article 13 of the KVKK, based on the choice indicated in this Application Form. If you have a preference for the delivery method of the application result (mail, electronic mail, or fax), please specify below:

I would like the result of my application to be sent to my email address.

I would like the result of my application to be sent to my address via post.

I would like the result of my application to be sent via fax.

Your requests will be finalized free of charge by Hedef Holding. However, if the response process incurs additional costs, fees may be charged in amounts determined within the framework of the relevant legislation.****

6. DATA SUBJECT DECLARATION

I request that my application for information under the KVKK be evaluated and finalized within the framework of the request(s) I have specified above. I acknowledge, declare, and undertake that the information and documents I have provided in this application are correct, up-to-date, and belong to me.

Data Subject

Name Surname

Application Date

Signature

****If your request is responded to in writing, for responses exceeding 10 (ten) pages, a fee of 1 (one) Turkish Lira will be charged for each page over 10 pages; if the response is provided on a recording medium such as a CD or flash drive, the cost of the recording medium will be charged. In case of updates to the relevant fees, the updated maximum fee amounts will be applied.

APPENDIX – 1

LIST OF PERSON GROUPS AND INSTITUTIONS SHARED WITH PERSONAL DATA

- Consulting Companies
- Valuation and Independent Auditing Companies
- Banks
- Insurance Companies
- Social Security Institution
- Borsa İstanbul A.Ş.
- Capital Markets Board
- Central Securities Depository A.Ş.
- İstanbul Settlement and Custody Bank A.Ş.
- Printing Companies
- Potential Investors
- Target Companies
- Group Companies
- Information Systems Companies