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**Daikin Isıtma ve Soğutma Sistemleri Sanayi Ticaret Anonim Şirketi
Personal Data Protection and Processing Policy**

Document Details	
Document Name	Daikin Isıtma ve Soğutma Sistemleri Sanayi Ticaret Anonim Şirketi Personal Data Protection and Processing Policy
Target Audience	All real entities, whose personal data are processed by Daikin Isıtma ve Soğutma Sistemleri Sanayi Ticaret Anonim Şirketi
Reference / Justification	Law no. 6698 on Protection of Personal Data and other relevant secondary regulations
Approved by	Daikin Isıtma ve Soğutma Sistemleri Sanayi Ticaret Anonim Şirketi Personal Data Protection Committee


In case of a dispute between the Turkish version of this Personal Data Protection and Processing Policy, in which it was prepared, and any translation thereof, Turkish text shall prevail.

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DAIKIN ISITMA VE SOĞUTMA SİSTEMLERİ SANAYİ TİCARET ANONİM ŞİRKETİ PERSONAL DATA PROTECTION AND PROCESSING POLICY

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DAIKIN ISITMA VE SOĞUTMA SİSTEMLERİ SANAYİ TİCARET ANONİM ŞİRKETİ PERSONAL DATA PROTECTION AND PROCESSING POLICY

1. OBJECTIVE OF THE POLICY AND CONFIDENTIALITY COMMITMENT


- 1.1.** The highest priority values and objectives of Daikin Isıtma ve Soğutma Sistemleri Sanayi Ticaret Anonim Şirketi ("**Company**") includes protecting your fundamental rights and liberties and privacy, particularly confidentiality of your private life, in processing your personal data, and ensuring safety of your personal data in this scope. In this scope, principles adopted in performance of personal data processing activities carried out by our Company and fundamental principles adopted in terms of compliance of data processing activities of our Company with applicable secondary regulations and practices, and particularly the Law no. 6698 on Protection of Personal Data, are explained in this Daikin Isıtma ve Soğutma Ticaret Anonim Şirketi Personal Data Protection and Processing Policy ("**Policy**") and, thus, our Company ensures necessary transparency by informing you as the personal data subjects.
- 1.2.** In this scope, our Company is committed to processing and protecting your personal data with a sense of full responsibility, pursuant to applicable legislation, this Policy, and procedures to be implemented in connection with the Policy.

2. SCOPE OF THE POLICY


- 2.1.** This Policy concerns all personal data processed by automatic or non-automatic means, which are part of any data recording system, in respect of all real entities, whose personal data are processed.
- 2.2.** This Policy covers all data processing activities for personal data, processed by the Company, and is applicable to such activities.
- 2.3.** This policy is not applicable to data that do not qualify as personal data.
- 2.4.** This Policy may be amended upon approval of the Board of Directors if required by applicable legislation or as deemed necessary by the Company.
- 2.5.** In case of a discrepancy between regulations of the applicable legislation and this Policy, regulations of the applicable legislation shall prevail.

3. DEFINITIONS

The following terms, used in this Policy, shall embody the following meanings:

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“Explicit Consent”	freely given, specific, and informed consent,
“Disclosure Obligation”	Obligation of the Data Controller or parties authorized by the Data Controller to inform Data Subjects at the time of obtaining Personal Data pursuant to Article 10 of the LPPD and the Communiqué on Principles and Procedures to be Observed in Fulfillment of Disclosure Obligation,
“Data Subject(s)”	Real entities, whose Personal Data are processed by the Company or entities/organizations authorized on behalf of the Company,
“Destruction”	Deletion, destruction, or anonymization of Personal Data,
“Personal Data”	An identified or identifiable natural person. (Within the scope of this Policy, the term “Personal Data” shall also include “Private Personal Data” as defined below, where appropriate),
“Processing of Personal Data”	All kinds of procedures performed on all or a part of the Personal Data, such as obtaining, recording, storing, retaining, modifying, readjusting, disclosing, transferring, receiving, making available, classifying, or preventing the use of personal data, by automated or partially automated means or non-automated means as part of a data recording system,
“Committee”	Personal Data Protection Committee of the Company,
“Board”	Personal Data Protection Board,
“LPPD”	Law no. 6698 on Protection of Personal Data,
“PDP Regulations”	all applicable legislative regulations, Board decisions, Personal Data Protection Authority guidelines and public announcements, other regulatory and supervisory authority, court, and other public authority decisions / orders, as well as all regulations in the field of protection of Personal Data and amendments thereto, which might take effect in the future, on protection of Personal Data, and particularly the LPPD,
“PDP Procedures”	Procedures that establish the obligations to be fulfilled by the Company, Company personnel, and the Committee within the scope of policies issued with respect to protection of personal data,
“Private Personal Data”	data on race, ethnicity, political view, philosophical belief, religion, sect or other beliefs, manners of clothing, association, foundation or union

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membership, health, sex life, criminal record and safety measures of individuals, as well as biometric and genetic data,

- “Data Processor”** Natural or legal person, who processes Personal Data on behalf of the Data Controller based on the authority granted by the Data Controller, and
- “Data Controller”** The natural or legal person who determines the purpose and means of processing personal data and is responsible for the establishment and management of the data filing system.

4. FUNDAMENTAL PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA

4.1. Processing Personal Data in Compliance with The Law and The Rules Of Integrity

The Company shall process Personal Data in compliance with the law and the rules of integrity, and based on the principle of prudence. The Company shall process Personal Data to the extent required by and limited to business activities of the Company.

4.2. Ensuring that Personal Data is Accurate and Up-To-Date as Necessary


The Company shall all kinds of measures to ensure that Personal Data is complete, accurate, and current throughout the term of processing. In this scope, the Company shall establish necessary mechanisms for ensuring accuracy and currency of Personal Data and update the relevant Personal Data in accordance with modification requests made by the Data Subject in respect of their Personal Data pursuant to the PDP Regulations.

4.3. Processing Personal Data for Specific, Clear, and Legitimate Purposes

The Company shall determine Personal Data processing purposes before the Processing of Personal Data. In this scope, the Company shall explicitly set forth the Personal Data processing purposes and process Personal Data in line with business activities, pursuant to the purposes in connection with such activities. Accordingly, Data Subjects are informed pursuant to the PDP Regulations and their Explicit Consent is obtained as necessary.

4.4. Being Connected to the Purpose of Processing, Limited and Prudent

The Company shall collect Personal Data only according to the attributes and to the extent required by business activities, and processing of Personal Data shall be limited to determined objectives. Accordingly, the Company shall refrain from processing Personal Data that are not related to or needed in the achievement fulfillment of determined objectives.

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4.5. Retention of Personal Data As Long As Stipulated in The Applicable Legislation or Required for The Purpose of Their Processing

4.5.1. The Company shall retain Personal Data as long as the minimum period required for the purpose of processing and stipulated in the applicable legislation. In this context, the Company shall initially determine whether the legislation stipulates a period for retaining personal data and, if a period is determined, it shall act in compliance with such period. If a legal period is not available, Personal Data shall be retained as long as the period required for the purpose of processing.

4.5.2. Personal Data are destroyed at the end of determined retention periods in line with periodic Destruction periods or Data Subject application, and by means of determined Destruction methods (deletion and/or wiping and/or anonymization). In this case, it shall be ensured that the third parties, to which the Company transferred the Personal Data, also delete, destroy, or anonymize the Personal Data.

4.5.3. The Committee is responsible for operation of destruction processes. In this scope, the necessary procedure shall be established by the Committee.

5. PROCESSING OF PERSONAL DATA

Personal Data can be processed by the Company pursuant to only the following principles and procedures.


5.1. Explicit Consent

5.1.1. Personal Data shall be processed with Explicit Consent of the Data Subject, only absence of any of the other Personal Data Processing conditions specified below.

5.1.2. In this case, Personal Data shall be processed following provision of information to Data Subject pursuant to the fulfillment of the Disclosure Obligation, and if Data Subjects provide Explicit Consent with their free will.

5.1.3. Explicit Consent is obtained from Data Subjects by methods in compliance with the PDP Regulations. Explicit Consents are stored by the Company in a verifiable manner as long as necessary within the scope of PDP Regulations.

5.1.4. The Committee is obliged to ensure fulfillment of the Disclosure Obligation, obtaining Explicit Consent as necessary, and retention of obtained Explicit Consent in terms of all Personal Data Processing processes. All department employees that process Personal Data are obliged to observe the Committee's guidelines, this Policy, and PDP Procedures.

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5.2. Express Stipulation in the Legislation

Personal Data of the Data Subject are processed within the scope of this data processing condition if it is explicitly stipulated in the law on Processing of Personal Data; in other words, if there is an explicit provision on Processing of Personal Data in the applicable law.

5.3. Failure to Obtain Explicit Consent of the Data Subject Due to Physical Disability

If it is necessary for Personal Data to be processed for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her Explicit Consent due to the physical disability or whose Explicit Consent is not deemed legally valid, Personal Data of the Data Subject are processed within the scope of this data processing condition.

5.4. Direct Relation with Drawing Up or Executing an Agreement

Personal Data of the Data Subject are processed within the scope of this data processing condition if it is necessary to process Personal Data, provided that it is directly relevant to drawing up or executing an agreement, to which the Data Subject is a party.

5.5. Fulfillment by the Company of Its Legal Obligation

If it is necessary for Personal Data to be processed for the Company to fulfill its legal obligations, Personal Data of the Data Subject are processed within the scope of this data processing condition.

5.6. Public Disclosure of Personal Data by the Data Subject


If the Data Subject discloses their Personal Data publicly, the Personal Data in question shall be processed within the scope of this data processing condition, limited to the purpose of disclosure.

5.7. Requirement to Process Personal Data for Establishment or Protection of a Right

If Processing of Personal Data is necessary for establishment, exercise, or protection of a right, Personal Data of the Data Subject shall be processed within the scope of this data processing condition.


5.8. The Need to Process Personal Data for Legitimate Interests of the Company

If it is necessary for the Company to process data for its legitimate interests, Personal Data of the Data Subject shall be processed within the scope of this data processing condition, provided that fundamental rights and liberties of the Data Subject are not impaired.


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6. PROCESSING OF PRIVATE PERSONAL DATA

- 6.1.** Private Personal Data shall be processed by the Company pursuant to the principles and procedures specified in this Policy, by taking all kinds of necessary administrative and technical measures, including methods to be determined by the Board, and in the presence of at least one of the following circumstances:
- 6.1.1.** Presence of explicit consent of the data subject,
 - 6.1.2.** Express stipulation in the legislation,
 - 6.1.3.** The need for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid,
 - 6.1.4.** Pertinence to personal data made public by the Data Subject and conformity with the public disclosure will,
 - 6.1.5.** Requirement for establishment, exercise, or protection of a right,
 - 6.1.6.** Requirement by entities under confidentiality obligation or authorized institutions and organizations for the purposes of protection of public health, preventive medicine, performance of medical diagnosis, treatment and care services, and planning, management, and financing of health services,
 - 6.1.7.** The need for fulfillment of legal obligations in employment, occupational health and safety, social security, social services, and social welfare,
 - 6.1.8.** Being aimed at current or former members and affiliates of foundations, associations, and other non-profit organizations or entities established with political, philosophical, religious, or union purposes, or other individuals in regular contact with these organizations and entities, provided that processing is in line with the legislation governing them and fit for their purposes, limited to their areas of activity, and not disclosed to third parties.
- 6.2.** With regard to employees included in Private Personal Data Processing procedures, the Company:
- 6.2.1.** Provides regular trainings about PDP Regulations and Private Personal Data security.
 - 6.2.2.** Enters into confidentiality agreements.
 - 6.2.3.** Clearly defines authorization scopes and durations for users authorized to access Private Personal Data.
 - 6.2.4.** Performs periodic authorization controls.

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- 6.2.5.** Immediate revokes relevant authorizations for employees, who are reassigned or who leave their jobs, and retrieves inventory allocated to them.
- 6.3.** If Private Personal Data are transferred to electronic media, in respect of the electronic media where Private Personal Data are processed, stored, and/or accessed, the Company:
- 6.3.1.** Stores Private Personal Data by means of cryptographic methods.
- 6.3.2.** Keeps cryptographic keys on secure and different media.
- 6.3.3.** Securely logs activity records for all actions performed on Private Personal Data.
- 6.3.4.** Constantly follows up security updates for media containing Private Personal Data, regularly performs / ensures performance of necessary security testing, records test results.
- 6.3.5.** Makes user authorizations for software, regularly performs / ensures performance of security testing for such software, and records test results if Private Personal Data are accessed by means of a software.
- 6.3.6.** Provides at least two-factor authentication system if Private Personal Data are accessed remotely.
- 6.4.** If Private Personal Data are processed on physical media, in respect of the physical media where data are processed, stored, and/or accessed, the Company:
- 6.4.1.** Takes adequate security measures (against situations such as electrical failure, fire, flood, theft) according to the nature of the environment where Private Personal Data are stored.
- 6.4.2.** Ensures physical security of these environments and prevents unauthorized entry and exit.
- 6.5.** If Private Personal Data are transferred, the Company:
- 6.5.1.** Uses encrypted corporate e-mail address or Registered E-Mail (KEP) account if it is necessary to transfer Private Personal Data by e-mail.
- 6.5.2.** Performs encryption by cryptographic methods and keeps the cryptographic key on a different media if it is necessary to transfer Private Personal Data with media such as flash drive, CD, or DVD.

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- 6.5.3.** Sets up VPN between servers or makes the transfer by means of SFTP if it is necessary to transfer Private Personal Data between servers in separate physical environments.
- 6.5.4.** Takes necessary measures against risks such as theft, loss, or unauthorized people viewing the documents, and sends the documents in “classified document” format if it is necessary to transfer Private Personal Data on paper.
- 6.6.** In addition to abovementioned regulations, the Committee is responsible for taking measures and establishing mechanisms pursuant to the PDP Regulations issued by the Board, particularly the Personal Data Security Guidelines, on ensuring security of Private Personal Data.

7. PERSONAL DATA PROCESSED BY THE COMPANY AND PROCESSING PURPOSES

The Company processes Personal Data in line with the general principles specified in the LPPD, particularly the principles specified in article 4 of the LPPD on Processing on Personal Data, based on and limited to at least one of the Personal Data processing conditions specified in articles 5 and 6 of the LPPD, in line with the Personal Data processing purpose of the Company, by informing the Data Subjects in accordance with the PDP Regulations. Pursuant to the purposes and conditions specified in this Policy, detailed information on processed Personal Data categories and Personal Data processing purposes can always be accessed by means of Data Controllers Registry Information System (VERBİS) “Registration Inquiry” screen of the Personal Data Protection Authority.


8. RETENTION PERIOD AND DESTRUCTION OF PERSONAL DATA

- 8.1.** The Company shall retain Personal Data as long as the minimum period required for the purpose of processing duration and stipulated in the applicable legislation. In this context, the Company shall initially determine whether the legislation stipulates a period for retaining personal data; if a period is determined, it shall act in compliance with such period. If a legal period is not available, Personal Data shall be retained as long as the period required for the purpose of processing. The Company shall by no means retain Personal Data in consideration of the possibility of future use.
- 8.2.** The Company shall establish a Personal Data Storage and Destruction Policy pursuant to the Personal Data processing inventory and conduct all activities regarding Destruction (deletion and/or wiping and/or anonymization) in compliance with PDP Regulations and applicable Personal Data Storage and Destruction Policy. Personal Data are destroyed at the end of retention periods determined pursuant to prepared Personal Data retention and destruction policy, in line with periodic Destruction periods or Data Subject application, and by means of determined Destruction methods (deletion and/or wiping and/or anonymization). The Committee is responsible for operation of destruction processes. In this scope, the necessary procedure shall be established by the Committee.

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9. TRANSFER OF PERSONAL DATA

- 9.1.** The Company may take necessary security measures in line with lawful Personal Data processing purposes and transfer Personal Data of Data Subjects to local and/or foreign third parties in compliance with the PDP Regulations. In this case, necessary protective regulations are inserted in contracts made with third parties.
- 9.2.** The Company may transfer Personal Data to third parties domiciled within the country by taking necessary administrative and technical measures in compliance with the PDP Regulations in the presence of one or several of the following conditions, even if Explicit Consent of the Data Subject is not available:
- Express stipulation of activities, concerning transfer of Personal Data, in the legislation,
 - The need for the Company to transfer personal data in direct relation with and as required for drawing up or executing an agreement,
 - The need to transfer personal data for fulfillment of a legal obligation of the Company,
 - Provided that Personal Data are made public by the Data Subject, transfer by the Company, limited to the purpose for which they were made public,
 - The need for the Company to transfer Personal Data for the establishment, exercise, or protection of the rights of the Company or the Data Subject or third parties,
 - The need to engage in Personal Data transfer activities for legitimate interests of the Company, on the condition that fundamental rights and liberties of the Data Subject are not harmed,
 - The need for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid.
- 9.3.** In addition to the matters mentioned above, Personal Data may be transferred by the Company to third parties domiciled abroad, which are decided to be qualified, in the event of any condition specified in the provision of Article 9.2 of this Policy and in the presence of a qualification decision made by the Board about the country where the transfer shall be made, sectors within the country, or international organizations.
- 9.4.** If a qualification decision is not available, Personal Data may be transferred by the Company to third parties domiciled abroad in the event of any condition specified in the provision of Article 9.2 of this Policy, if the data subject can exercise their rights and take effective legal action in the country where the transfer shall be made, and provided that the parties provide one of the proper assurances mentioned below:
- Presence of an agreement, which does not constitute and international convention, made between foreign public institutions and

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organizations or international organizations and Turkish public institutions and organizations or professional organizations that qualify as public institutions, and consent of the Board to the transfer,

- Presence of binding company rules that contain provisions on protection of personal data and that are approved by the Board, which the companies within the group of enterprises that engage in common economic activities,
- Presence of the standard agreement announced by the Board, containing matters such as data categories, purposes for data transfer, recipients and recipient groups, technical and administrative measures to be taken by the data recipient, additional measures taken for private personal data,
- Presence of a written letter of undertaking containing provisions ensuring adequate protection, and permission of the Board for the transfer.


9.5. The Company may incidentally transfer Personal Data to third parties domiciled abroad only in the presence of one of the following conditions, in case there is no qualification decision and none of the abovementioned proper assurances can be provided:

- Provision of explicit consent for transfer by the data subject, on the condition that they are informed about potential risks,
- The need to transfer for execution of an agreement between the data subject and the data controller or implementation of pre-contractual measures taken upon request of the data subject,
- The need to transfer for entering into or performance of an agreement to be made by the data controller and another real or legal entity in favor of the data subject,
- The need to transfer for overriding public interest,
- Requirement for personal data to be transferred for establishment, exercise, or protection of a right,
- The need for personal data to be transferred for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid,
- Transfer from a registry open to the public and entities with legitimate interest, provided that the requirements specified in the application in terms of access to the registry are fulfilled and it is requested by an entity with legitimate interest.

10. TRANSFER OF PRIVATE PERSONAL DATA

10.1. Private Personal Data may be transferred by the Company pursuant to the principles specified in this Policy, by taking all kinds of necessary administrative and technical measures, including methods to be determined by the Board, and in the presence of the following circumstances:

- Presence of explicit consent of the data subject,
- Express stipulation in the legislation,


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- The need for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid,
- Pertinence to personal data made public by the Data Subject and conformity with the public disclosure will,
- Requirement for establishment, exercise, or protection of a right,
- Requirement by entities under confidentiality obligation or authorized institutions and organizations for the purposes of protection of public health, preventive medicine, performance of medical diagnosis, treatment and care services, and planning, management, and financing of health services,
- The need for fulfillment of legal obligations in employment, occupational health and safety, social security, social services, and social welfare,
- Being aimed at current or former members and affiliates of foundations, associations, and other non-profit organizations or entities established with political, philosophical, religious, or union purposes, or other individuals in regular contact with these organizations and entities, provided that processing is in line with the legislation governing them and fit for their purposes, limited to their areas of activity, and not disclosed to third parties.

10.2. In addition to the matters mentioned above, Private Personal Data may be transferred by the Company to third parties domiciled abroad, which are decided to be qualified, in the event of any condition specified in the provision of Article 10.1 of this Policy and in the presence of a qualification decision made by the Board about the country where the transfer shall be made, sectors within the country, or international organizations.

10.3. If a qualification decision is not available, Private Personal Data may be transferred by the Company to third parties domiciled abroad in the event of any condition specified in the provision of Article 10.1 of this Policy, if the data subject can exercise their rights and take effective legal action in the country where the transfer shall be made, and provided that the parties provide one of the proper assurances mentioned below:

- Presence of an agreement, which does not constitute an international convention, made between foreign public institutions and organizations or international organizations and Turkish public institutions and organizations or professional organizations that qualify as public institutions, and consent of the Board to the transfer,
- Presence of binding company rules that contain provisions on protection of personal data and that are approved by the Board, which the companies within the group of enterprises that engage in common economic activities,
- Presence of the standard agreement announced by the Board, containing matters such as data categories, purposes for data transfer, recipients and recipient groups, technical and administrative measures to be taken by the data recipient, additional measures taken for private personal data,
- Presence of a written letter of undertaking containing provisions ensuring adequate protection, and permission of the Board for the transfer.

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10.4. The Company may incidentally transfer Private Personal Data to third parties domiciled abroad only in the presence of one of the following conditions, in case there is no qualification decision and none of the abovementioned proper assurances can be provided:


- Provision of explicit consent for transfer by the data subject, on the condition that they are informed about potential risks,
- The need to transfer for execution of an agreement between the data subject and the data controller or implementation of pre-contractual measures taken upon request of the data subject,
- The need to transfer for entering into or performance of an agreement to be made by the data controller and another real or legal entity in favor of the data subject,
- The need to transfer for overriding public interest,
- Requirement for personal data to be transferred for establishment, exercise, or protection of a right,
- The need for personal data to be transferred for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the physical disability or whose consent is not deemed legally valid,
- Transfer from a registry open to the public and entities with legitimate interest, provided that the requirements specified in the application in terms of access to the registry are fulfilled and it is requested by an entity with legitimate interest.

11. DISCLOSURE OBLIGATION OF THE COMPANY

11.1. The Company shall inform Data Subjects before Processing of Personal Data pursuant to article 10 of the LPPD and the provisions of the Communiqué on Principles and Procedures to be Observed in Fulfillment of Disclosure Obligation. In this scope, the Company shall inform Data Subjects about who processed the Personal Data in the capacity of Data Controller and for which purpose, the reason for processing, the reasons for disclosure and recipients of data, collection methods and legal grounds, and rights possessed by Data Subjects within the scope of processing of their Personal Data, pursuant to the PDP Regulations.

11.2. The Committee shall establish necessary PDP Procedures for reporting all new Personal Data Processing processes to the Committee.

11.3. If the Data Processor is a third party other than the Company, such third party shall commit with a written agreement to act in compliance with abovementioned obligations before Personal Data Processing starts. Each employee is liable to pursue the process in this Policy and PDP Procedures in case a third party transfers Personal Data to the Company.

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12. RIGHTS OF DATA SUBJECTS

12.1. Data Subjects are entitled to the following:


- To find out whether their Personal Data was processed,
- To request pertinent information if their Personal Data was processed,
- To find out the purpose of processing and whether their Personal Data was purposefully used,
- To find out local and foreign third parties to whom Personal Data was transferred,
- To request correction of their Personal Data if it was incompletely or incorrectly processed, and to request notification of this procedure to third parties to whom their personal data was transferred,
- To request deletion or destruction of their Personal Data in case the reasons for processing no longer exist, and to request notification of this procedure to third parties to whom their Personal Data was transferred, even though their Personal Data was processed pursuant to the LPPD and other provisions of applicable law,
- To object to an outcome against the person due to the analysis of processed data exclusively by means of automated systems,
- To request compensation if they incur losses due to unlawful processing of their Personal Data.

12.2. Data Subjects may submit their requests concerning their rights, specified in section 12.1. of this Policy, to the Company by means of the methods determined by the Board. Accordingly, they can use the Daikin Isıtma ve Soğutma Sistemleri Sanayi Ticaret Anonim Şirketi Data Subject Application Form accessible via <https://www.daikin.com.tr/daikin-kisisel-verilerin-korunmasi> . However, current application methods and application contents should be checked from the applicable legislation and applications should be made in compliance with such principles and procedures in any event.


12.3. If Data Subjects submit their written requests concerning their abovementioned rights to the Company, the Company shall conclude the request pursuant to PDP Regulations at the latest within 30 (thirty) days according to the nature of the request, at no charge. If conclusion of requests by the Data Controller involves a separate cost, the Data Controller may charge fees in the tariff determined by the Board.

13. PERSONAL DATA MANAGEMENT AND SECURITY

13.1. The Company shall establish a Committee to fulfill its obligations within the scope of PDP Regulations, ensure and supervise preparation and implementation of necessary PDP Procedures for implementation of this Policy, and to make recommendations regarding operation of these.

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- 13.2.** The Company shall take any necessary administrative and technical measures to ensure security of Personal Data pursuant to PDP Regulations. In this scope, Personal Data Processing activities shall be audited by the Company with technical systems depending on technological means and applications costs.
- 13.3.** Personnel with knowledge on technical matters regarding Personal Data Processing activities shall be employed.
- 13.4.** Company personnel shall be informed about and trained for protection and lawful processing of Personal Data.
- 13.5.** Necessary PDP procedures shall be established to ensure access of personnel, who needs to access Personal Data within the Company, to the Personal Data in question and the Committee shall be responsible for establishment and implementation of such procedures.
- 13.6.** Company personnel may access Personal Data only subject to the authorization granted to them and pursuant to the applicable PDP Regulations.
- 13.7.** If company personnel suspect that Personal Data security is not adequately ensured or if they identify such a security vulnerability, they shall promptly notify the matter to the Committee.
- 13.8.** The Committee shall establish detailed PDP Procedures for Personal Data security.
- 13.9.** Each individual, to whom a Company device is allocated, shall be responsible for the security of devices allocated to their use.
- 13.10.** Each Company personnel shall be responsible for the security of physical files in their field of responsibility.
- 13.11.** In the event that there are security measures requested or to be additionally requested in terms of Personal Data security within the scope of PDP Regulations, all personnel shall be liable to observe additional security measures and ensure continuity of such security measures.
- 13.12.** All Personal Data, processed within the Company, are considered as “Confidential Information” by the Company.
- 13.13.** Company Personnel are informed that their liabilities in terms of security and confidentiality of Personal Data shall continue after termination of employment and commitments of Company Personnel are obtained to have them observe this rule.

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14. INSPECTION

The Company is entitled to always, directly, and regularly audit without any prior notice whether all personnel and Data Processors of the Company act in compliance with PDP Regulations, this Policy, and PDP Procedures, and it shall conduct any necessary routine audit in this scope. The Committee shall establish PDP Procedures for such audits and ensure that the mentioned procedures are implemented.

15. RESPONSIBILITIES

The Committee, which is responsible for preparation, revision, and implementation of this Policy, shall be appointed with the decision of the Board of Directors and changes in this scope shall also be made as mentioned.

16. AMENDMENTS TO THE POLICY

- 16.1.** The Company may amend this Policy from time to time upon approval of the Board of Directors.
- 16.2.** The Company shall make the current Policy version available to Data Subjects on the following website.

Relevant Website Address(es): www.daikin.com.tr

17. EFFECTIVE DATE OF THE POLICY

This version of this Policy took effect upon approval by the PDP Committee of the Company on **01.06.2024**.