

**PROTECTION AND PROCESSING OF PERSONAL DATA
POLICY OF ALACAKAYA MARBLE AND MINING
FACILITY INC.**

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1. SECTION 1- INTRODUCTION

1.1. INTRODUCTION

Protection of personal data is among the most important priorities of **Alacakaya Marble and Mining Facility Inc.** ("**Company**") and our Company shows maximum effort to act in accordance with all applicable legislation in this regard. The most important part of this issue is to have established this **Alacakaya Marble and Mining Facility Inc.** Policy for the Protection and Processing of Personal Data ("**Policy**").

The principles adopted in the execution of the personal data processing activities carried out by our Company within the framework of this Policy and the basic principles adopted in terms of the compliance of our Company's data processing activities with the Law No. 6698 on the Protection of Personal Data ("**Law**") are explained, and thus we provide the necessary transparency by informing the personal data owners. It provides. With full awareness of our responsibility in this context, your personal data is processed and protected under this Policy.

1.2. CONTENT

This Policy pertains to all personal data processes by non-automated systems on the condition that it is part of the data recording system, or automated systems.

2. SECTION 2 – ISSUES RELATED TO PERSONAL DATA PROCESSING

2.1 Processing of Personal Data in Compliance with the Principles Estimated in the Regulation

2.1.1. Processing in Accordance with Law and Honesty

Personal data are processed in accordance with the general trust and honesty rule, without damaging the fundamental rights and freedoms of individuals. Within this framework, personal data are processed to the extent required by our Company's business activities and to a limited extent.

2.1.2. Making Personal Data Accurate and Up-to-date When Required

Our company takes the necessary precautions to keep the personal data accurate and up to date during the processing, and establishes the necessary mechanisms to ensure the accuracy and timeliness of the personal data for certain periods.

2.1.3. Processing for Specific, Explicit and Legitimate Purposes

Our company clearly reveals the purposes of processing personal data, in line with its business activities it operates within the scope of the purposes related to these activities.

2.1.4. Being Related, Limited and Measured for the Purpose They Are Processed

Our company collects personal data only in the quality and extent required by business activities and processes it for limited and specified purposes.

2.1.5. Preservation for the Period Estimated in the Relevant Legislation or Required for the Purpose

Our Company stores personal data for the time required for the purpose for which they are processed and for the minimum period stipulated in the relevant legal legislation. In this context, our Company firstly determines whether a period is foreseen for the storage of personal data in the relevant legislation, and if a period has been determined, it acts accordingly. If a legal period is not available, personal data is stored for the time required for the purpose for which they were processed. Personal data are terminated at the end of the specified retention periods in accordance with the periodic termination periods or the data subject's application and with the specified termination methods (deletion and / or destruction and / or anonymization).

2.2 PROCESSING TERMS OF THE PERSONAL DATA

The explicit consent of the personal data owner is only one of the legal bases that make it possible to process personal data in accordance with the law, and in the presence of one of the conditions below, personal data is processed by our Company without the explicit consent of the data subject.

Apart from explicit consent, the basis of the personal data processing activity can be only one of the following conditions, and multiple conditions can be the basis of the same personal data processing activity.

2.2.1 Clear Foresight in Laws

If it is clearly stipulated in the law, in other words, in case there is a clear provision regarding the processing of personal data, the personal data of the data subject can be processed by our Company within the framework stipulated in the legislation.

2.2.2 The Establishment or Direct Relevance of the Contract

Provided that the data subject is directly related to the establishment or relevance of the contract to which it is a party, this condition may be deemed to have been fulfilled if it is necessary to process the personal data.

2.2.3 Legal Obligation Fulfillment of the Company

If data processing is mandatory for our company to fulfill its legal obligations, personal data of the data subject can be processed.

2.2.4 Obligated Data Processing for the Establishment or Protection of a Right

If data processing is mandatory for the establishment, use or protection of a right, the personal data of the data subject can be processed.

2.2.5 Obligated Data Processing for the Legitimate Interest of Our Company

If the data processing is mandatory for our Company's legitimate interests, the personal data of the data subject can be processed, provided that it does not harm the fundamental rights and freedoms of the personal data owner.

2.3 Processing of Special Qualified Personal Data

Special attention has been attributed to the personal data that are sensitive under the law, because of the risk of causing victimization or discrimination of individuals when illegally processed. These “specially qualified” personal data; are data on race, ethnicity, political thought, philosophical belief, religion, sect or other beliefs, appearance, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data.

Special quality personal data are processed by our Company in accordance with the principles set forth in this Policy and by taking any necessary administrative and technical measures, including methods to be determined by the Board, and in the presence of the following conditions:

- (i) Special personal data, except for health and sexual life,** can be processed without explicit consent of the data subject in the event that if it is clearly stipulated in the law, in other words, in case there is a clear provision regarding the processing of personal data. Otherwise, the explicit consent of the data subject will be obtained.
- (ii) Special personal data related to health and sexual life,** can be processed without seeking explicit consent for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, health services and planning and management of financing, by persons or authorized institutions and organizations under the obligation to keep secrets. Otherwise, the explicit consent of the data subject will be obtained.

3. SECTION 3 – ISSUES RELATED TO THE TRANSFER OF PERSONAL DATA

Our company can transfer the personal data and special qualified personal data of the personal data owner to third parties by taking the necessary security precautions for the purposes of personal data processing in compliance with the law. Accordingly, our company acts in accordance with the regulations stipulated in the 8th and 9th articles of the Law.

3.1 Transfer of Personal Data

Even if the personal data owner does not have explicit consent, personal data can be transferred to third parties by taking necessary care by our Company and taking all necessary security measures, including methods prescribed by the Board, if one or more of the following conditions exist.

- If there is a clear anticipation of the relevant activities related to the transfer of personal data in the laws,
- If the transfer of personal data by the Company is directly related to the establishment or relevance of the contract
- If the transfer of personal data is mandatory for our Company to fulfill its legal obligations,
- Limited transfer of personal data by our Company for the purpose of publicization, provided that it is publicized by the data subject,

- If the transfer of personal data by the Company is mandatory for the establishment, use or protection of the rights of the Company or data owner or third parties,
- If it is mandatory to carry out personal data transfer activities for the legitimate interests of the Company, provided that it does not harm the fundamental rights and freedoms of the data subject,

If the personal data will be transferred abroad, in addition to the conditions above, it is transferred to foreign countries ("**Foreign Country with Adequate Protection**") declared to have sufficient protection by the Board.

3.2 transfer of Special Qualified Personal Data

Special quality personal data may be transferred by our Company in accordance with the principles set forth in this Policy and by taking any necessary administrative and technical measures, including methods to be determined by the Board, and in the presence of the following conditions:

- (iii) **Special personal data, except for health and sexual life**, can be processed without explicit consent of the data subject in the event that if it is clearly stipulated in the law, in other words, in case there is a clear provision regarding the processing of personal data. Otherwise, the explicit consent of the data subject will be obtained.
- (iv) **Special personal data related to health and sexual life**, can be processed without seeking explicit consent for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, health services and planning and management of financing, by persons or authorized institutions and organizations under the obligation to keep secrets. Otherwise, the explicit consent of the data subject will be obtained.

If special quality personal data will be transferred abroad, in addition to the above conditions, it will be transferred to Foreign Countries with Sufficient Protection or to Foreign Countries with Data Controller Guaranteeing to Have Adequate Protection.

4. SECTION 4 – CLARIFICATION FOR THE PERSONAL DATA OWNER

In accordance with Article 10 of the Law and secondary legislation, our Company informs the personal data owners regarding who processed their personal data and for which purposes as data controller, with whom, for which purposes the related data is shared, with which methods the related data is collected, the legal reasons for it and the rights that the data owners have within the scope of the personal data processing.

5. SECTION 5- STORAGE AND EXTERMINATION OF PERSONAL DATA

Our company maintains personal data for the time required for the purpose for which they are processed and for the minimum period stipulated in the relevant legal legislation. In this context, our Company firstly determines whether a period is foreseen for the storage of personal data in the relevant legislation, and if a period has been determined for a while, it acts accordingly. If a legal period is not available, personal data is stored for the time required for the purpose for which they were processed. At the end of specified retention periods, personal data is destroyed in accordance with the periodic destruction periods or the data subject's application and with the specified termination methods (deletion and / or destruction and / or anonymization).

6. SECTION 6 - ISSUES RELATED TO PROTECTION OF PERSONAL DATA

In accordance with article 12 of the Law, our company takes necessary measures according to the nature of the data to be protected in order to prevent the disclosure, access, transfer or other security deficiencies that may occur in other ways. In this context, our Company takes administrative measures, conducts or makes inspections in order to provide the necessary level of security in accordance with the guides published by the Personal Data Protection Board ("**Board**").

In this context, the technical and administrative measures taken by our Company for the protection of personal data are carefully implemented in terms of special personal data and necessary audits are provided within our Company.

Our company provides necessary trainings to business units in order to raise awareness to prevent personal data from being processed unlawfully, to prevent illegal access to the data and to protect the data.

Our company establishes the necessary systems to raise the awareness of the current employees and new employees in the field of personal data protection, and if necessary, works with consultants. In this regard, our Company evaluates the participation in relevant trainings, seminars and information sessions and organizes new trainings in parallel with the update of the relevant legislation.

7. SECTION 7 – RIGHTS OF PERSONAL DATA OWNERS AND USE OF THESE RIGHTS

7.1 RIGHTS OF THE PERSONAL DATA OWNER

In relation to your personal data, you are entitled to;

- 1) Find out whether your personal data is processed,
- 2) Request information if your personal data has been processed,
- 3) Learn the purpose of processing personal data and whether it is used in accordance with its purpose,
- 4) Know the third parties to whom your personal data are transferred within the country or abroad
- 5) Request correction of your personal data if it is incompletely or incorrectly processed and to request this to be notified to third parties to whom we transfer your personal data,
- 6) Despite the fact that it has been processed in accordance with the provisions of the law and other relevant laws, request the deletion or termination of personal data in case the reasons requiring its processing disappear and to request this to be notified to third parties to whom we transfer your personal data,
- 7) Object to the emergence of a result against the person himself by analyzing the processed data exclusively through automated systems
- 8) If you are harmed by the personal data being processed illegally, to request the compensation of this damage

7.2 THE USE OF THE RIGHTS BY THE PERSONAL DATA OWNER

Personal data holders will be able to submit their requests regarding their rights listed in section 7.1 ("**Rights of the Personal Data Owner** ") to our Company by the methods determined by the

Board. Accordingly, they will be able to use the "Related Person Application Form" available on our website.

7.3 OUR COMPANY'S RESPONSE TO THE APPLICATIONS

Our company takes the necessary administrative and technical measures to finalize applications made by the personal data owner in accordance with the Law and secondary legislation.

In the event that the *personal data* subject duly conveys his request regarding the rights in section 7.1 ("**Personal Data Owner Rights**") to our Company, our Company will conclude the request free of charge as soon as possible and within 30 (thirty) days at the latest. However, if the transaction requires a separate, extra cost, a fee may be charged in accordance with the tariff set by the Board.