Personal Data Processing and Protection Policy

Gülermak provides construction and contracting services all over the globe. As regards to any personal data acquired due to operations, Gülermak performs procedures for the acquirement, recording, storing, preservation, changing, rearrangement, disclosing, transfer, acceptance, accessibility, classification or prevention activities under Personal Data Processing and Protection Policy ("the Policy").

General Policy

As per the general policy concerning the processing and protection of personal data, Gülermak:

- Requests only necessary data from Natural Persons, collected solely with their consent, in compliance with the local regulation and due to legal liabilities, for processing and/or for a specific designated purpose, with the condition to take all measures for the confidentiality of such data.

- Informs Natural Persons about the type and purpose of data request, the mode and purposes and time of recording and preservation, and possible transferees and the rights of Natural Persons.

- Raise the awareness of its employees as regards to processed data, restrictions to access the personal data of others according to their duties, and includes personal data protection commitments in labour contracts. Apart from the foregoing, Gülermak executes agreements with transferee third parties and institutions in order to ensure that the processing type and confidentiality of transferred personal data are secured.

- Gülermak keeps acquired personal data only as long as permitted by the law or it is necessary to preserve/store personal data by any means, and deletes, effaces or anonymizes all personal data according to the regulation when they are not necessary.

- Gülermak has also established all necessary rules so as to enable natural persons to execute their legal rights as regards to their processed personal data.

Fundamental Principles

As regards to processed personal data, Gülermak shows utmost attention to:

a. Compliance with law and good faith;
b. Accuracy and actuality when necessary;
c. Processing for designated, clear and legal purposes;
d. Processing to be limited, measured and associated with the purpose;
e. Preservation as long as permitted by regulations and until termination of designated time required by the purpose.

Gülermak takes all necessary administrative and technical measures in order to ensure processing in conformance with the foregoing.

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Personal Data Processing and Protection Policy

The Measures Taken for the Protection of Personal Data

Gülermak undertakes the responsibility of administration and technical measures for:

- training all employees and increasing awareness about personal data protection;

- determining personal data security policies and procedures;

- investigating risks and acting on mitigation measures on threats;

- limiting the use of personal data, including the period of keeping the data;

- monitoring the security of stored personal data and protecting the same.

Right to Application by Natural Persons

Natural Persons can apply to Gülermak at any time regarding information about their personal data and Gülermak will inform them in compliance with Laws and Regulations related to Personal Data Protection.

- Learn whether their personal data are processed;

- Request information about the procedure if their personal data are processed;

- Learn the purpose of personal data processing and whether processing is performed according to the designated purposes;

- Request correction if personal data are processed incompletely or incorrectly.

In this direction, natural persons are entitled to make inquiries and to send e-mail to **policies@gulermak.com** about any questions or complaints. These requests will be concluded within the shortest time possible or, in any case maximum within 30 (thirty) days.

Signature valid

Digitally signed by Mustafa Tuncer
Date: 2021.02.26 13:54:51 CET

Dijital olarak imzalayan Kemal Güleryüz
Tarih: 2021.02.26 14:37:18 +03'00'

Mustafa Tuncer
Chairman of Executive Board

Kemal Tahir Güleryüz
Chairman

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