

ETHICS HOTLINE PRIVACY NOTICE

This Ethics Hotline Privacy Notice has been prepared by **Kazancı Holding A.Ş. and its Group Companies (the “Company”)**, acting as the data controller, in accordance with Law No. 6698 on the Protection of Personal Data (“**KVKK**”) and the relevant legislation, in order to inform individuals who submit reports through the ethics hotline regarding the processing of their personal data.

1. Processed Personal Data and Scope of Processing

Personal data refers to any information relating to an identified or identifiable natural person. For example, your name and surname, eye color, telephone number, or bank account details are personal data. Processing of personal data refers to any operation performed on data, such as obtaining, modifying, recording, storing, deleting, disclosing, or transferring.

Depending on the communication channel that is preferred for reporting to the ethics hotline, the personal data processed are set out below:

- If provided by you, your identity data (name, surname), contact data (e-mail address, telephone number), and any other information included in the content of your report will be recorded.
- It is possible to submit a report through our online channel without providing any personal data that would reveal your identity. In such cases, the processed data will be limited to the information contained in the content of your report.
- If you contact our ethics hotline by phone, the telephone number used for the call will appear in our systems and will be processed. In addition, the information you provide verbally will be recorded and used within the scope of our review and investigation processes.
- If you contact our ethics hotline via e-mail, your contact data (e-mail address) and the information included in your report will be processed and used within the scope of our review and investigation processes.

2. Purposes and Legal Basis for the Processing of Your Personal Data

Your personal data are processed for the purposes set out below, based on the legal grounds that the relevant data subject has made the personal data public and that processing is mandatory for the data controller to fulfill its legal obligations:

- Management of the Ethics Hotline,
- Reviewing, analysing, and taking appropriate actions regarding incoming complaints and reports,
- Reporting of complaints and reports,
- Requesting additional information and documents from you in relation to your reports, if you have shared your identity and contact details,
- Informing authorized individuals, institutions, and organizations depending on the nature of the complaints and reports,
- Conducting and following up legal proceedings.

3. Recipient Groups to Whom Your Personal Data Are Transferred and Purposes of Transfer

The personal data you have shared in relation to your reports may be transferred to our lawyers in cases where legal support is required, and to public institutions and organizations for the purpose of providing information where necessary.

4. Retention Period of Your Personal Data

Personal data are retained for the periods stipulated by applicable legislation or for as long as necessary for the purposes for which they are processed. Where the legal grounds for processing no longer exist, the personal data shall be erased, destroyed, or anonymised, either ex officio or upon the data subject's request.

5. Your Rights Regarding Your Personal Data

Data subject refers to the natural person whose personal data are processed. As a data subject, under the KVKK, you have the following rights regarding your personal data:

- To be informed whether your personal data are being processed,
- To request information if your personal data have been processed,
- To obtain information on the purposes of the processing of your personal data and whether such data are processed in accordance with those purposes,
- To be informed of the third parties to whom your personal data are transferred, whether domestically or abroad,
- To request rectification of inaccurate or incomplete personal data,
- To request the erasure or destruction of your personal data within the framework of the conditions set forth under the KVKK,
- To request notification of the correction, deletion, or destruction of your personal data to third parties to whom such data have been transferred,
- To object to the occurrence of a result against you arising from the analysis of your personal data exclusively through automated systems,
- To request compensation for damages incurred due to the unlawful processing of your personal data.

6. Methods for Exercising Your Rights

You may submit your applications and requests regarding your personal data by completing the Data Subject Application Form available at <https://www.kazanciholding.com.tr/> and submitting it:

- By sending the form with your wet signature and a copy of your identity document to Rüzgarlıbahçe Mah., Özalp Çk. No:10, 34805 Kavacık – Beykoz / Istanbul (***the “Company address”***),
- By submitting it in person to the Company address together with a valid identity document,
- By sending the form signed with a secure electronic signature or mobile signature to kvkk@aksa.com.tr.

In order to ensure that the process is carried out effectively, you must clearly and explicitly specify which right you wish to exercise and provide detailed information regarding the requested transaction.

Please note that the request must relate to the data subject him/herself. If an application is submitted on behalf of another person, the applicant must be duly authorized for the requested transaction by means of a specific power of attorney. Unauthorized applications will not be taken into consideration.

7. Evaluation of Your Application

Your applications will be evaluated and responded to as soon as possible and no later than thirty (30) days from the date your request is received by us.