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1. PURPOSE

The purpose of this Policy is to determine principles related with the methods and the processes for protection of personal data obtained by İform Elektronik San. A.Ş. (İform Electronic Ind. INC.) (hereinafter referred to as the "Company").

2. SCOPE

This Policy covers all activities for Personal Data processed by the Company and is applied to mentioned activities.

3. DEFINITIONS

Explicit Consent: The Consent based on information, expressed in free will, regarding a particular issue.

Related Person: Natural person whose personal data is processed.

Personal Data: Any kind of information about a natural person who is identified or identifiable.

Personal Data of Private Quality: Data in relation to race, ethnic origin, political opinion, philosophic belief, religion, sect or other beliefs of related person, his/her appearance, association or foundation or union membership, health, sexual life, criminal convictions and data related with security measures, and biometric and genetic data.

The Law on the Protection of Personal Data (LPPD): The law numbered 6698 entered into force by being published on Official Gazette on 7 April 2016 with the purpose of protection of all types of information of natural persons.

Processing Personal Data: All types of transactions those can be made on data such as obtaining with non-automated ways, recording, storing, maintaining, changing, re-issuing, disclosing, transmitting, taking over, classifying or preventing of usage provided that personal data is wholly or partially automatic or a part of any data recording system.

Data Processor: A natural or a legal person who processes personal data on his/her behalf, based on the authority given by data controller,

Data Controller: A natural or a legal person who determines the purposes and means of processing personal data and who is responsible for establishment and management of a data recording system.

LPPD Regulations: It refers to other regulation related with protection of Personal Data with the Law of Protection of Personal Data numbered 6698, international contracts those can be practiced to protect data with binding decision, principle decisions, provisions, instructions those are decided by regulatory and supervisory authorities, courts and other authorities and all other types of regulations.

The Board: Personal Data Protection Board.

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Deletion and/or Anonymization: Making personal data inaccessible/unusable for related persons, making its relationship with a natural person impossible.

VERBİS: It refers to Data Controllers Registration System.

4. PRINCIPLES AND PROCEDURES REGARDING PROTECTION OF PERSONAL DATA


4.1. THE PERSONS RELATED WITH DATA PROCESSING

Our company can collect and process personal data from below given persons:

- Our customers, shareholders and authorities, suppliers, contractors and their employees, business contacts and potential customers (and/or natural persons related with them) and other business partners;
- Natural persons those we obtained their personal data within the frame of professional services that we provide (for instance, our customers' employees, their customers and suppliers and contact persons);
- Our employees, family members of our employees and the ones applied for job and their references;
- The ones who visit our webpage and our social media followers;
- Third persons (visitors, former employees, employees' friends who visit, etc.)

PERSONAL DATA CATEGORIZATION	RELATED DATA OWNER
COMMUNICATION DATA	Customers, share holders and authorities, suppliers, contractors and their employees, business contacts, potential customers (and/or natural persons related with them), business partners, authorities and employees of the institutions those we have cooperation, employees, employee candidates, third persons
IDENTITY DATA	Customers, share holders and authorities, suppliers, contractors and their employees, business contacts, potential customers (and/or natural persons related with them), business partners, authorities and employees of the institutions those we have cooperation, employees, employee candidates, third persons
PERSONNEL DATA	Share holders and authorities, employees, employee candidates, contractors and their employees

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SPECIAL PERSONAL DATA	Share holders and authorities, employees, contractors and their employees, relatives of employees
VISUAL AND AUDIAL DATA	Customers, share holders and authorities, suppliers, contractors and their employees, business contacts, potential customers (and/or natural persons related with them), business partners, authorities and employees of the institutions those we have cooperation, employees, employee candidates, third persons

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VEHICLE DATA	Share holders and authorities, authorities and employees of the institutions those we have cooperation, employees
LOCATION DATA	Share holders and authorities, employees
FINANCIAL INFORMATION	Share holders and authorities, suppliers, contractors and their employees, business contacts, customers and/or natural persons related with them, business partners, authorities and employees of institutions that we have cooperation, employees
ELECTRONIC DATA	Share holders and authorities, business partners, authorities and employees of the institutions that we have cooperation, employees, customers, third persons (webpage visitors, the persons using internet access of the company, etc.)
TRAINING DATA	Share holders and authorities, contractors' employees, employees, employee candidates
TRAVEL DATA	Share holders and authorities, authorities and employees of the institutions those we have cooperation, employees, customers
LEGAL RECORDS	Share holders and authorities, suppliers, business contacts, customers and/or natural persons related with them, business partners, employees
SECURITY INFORMATION	Shareholders and authorities, suppliers, business contacts, customers and/or natural persons those are related with them, contractors and their employees, potential customers, business partners, employees of the institutions those we have cooperation, employees, employee candidates, third persons
APPLICATION / COMPLAINT MANAGEMENT INFORMATION	Shareholders and authorities, suppliers, business contacts, customers and/or natural persons those are related with them, contractors and their employees, potential customers, business partners, employees of the institutions those we have cooperation, employees, employee candidates, third persons

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4.2. GENERAL PRINCIPLES RELATED WITH DATA PROCESSING

Our company processes personal data in accordance with principles and procedures stipulated in the Law on Protection of Personal Data numbered 6698 and other Laws.

Our company acts veraciously to below principles in processing personal data (LPPD a.4 / General Principles):

Being suitable with the law and good faith: Personal data is processed based on principle of proportionality and suitable with the law and good faiths by the Company.

Being correct and up-to-date when it is needed: The company takes all types of measures for making Personal Data full, correct and up-to-date and updates related Personal Data in case that a change is requested for Personal Data of related person

Processing in line with certain, legitimate and clear purposes: The Company processes personal data only for legitimate purposes determined clearly and certain and does not perform data processing activity except for these purposes.

Being connected with processing purpose, limited and proportional: The Company processes Personal Data only in accordance with principle of proportionality and in line with the purpose within the scope of Explicit Consent (LPPD Article 5.1 and Article 6.2) taken from related person or in case of exceptional within the scope of LPPD regulations,

Maintaining as long as it is required for the purpose of processing or stipulated in related regulation: The Company maintains Personal Data as long as it is required in accordance with its purpose. In case that the Company wants to maintain personal data for a period longer than required by the purpose of personal data processing or stipulated in LPPD regulations, the Company acts in line with obligations indicated in LPPD regulations. After the period required for the purpose of processing personal data, is over, it is deleted and/or anonymized

4.3. DATA PROCESSING CONDITIONS

Except cases indicated in the Law, Inform Elektronik processes personal data only with obtaining explicit consent of related persons, notifies related persons before taking explicit consent within the frame of Illumination Obligation. In case of existence of below conditions indicated in the Law, personal data can be processed even if there is no explicit consent of related person.

- If expressly stipulated by the laws
- In order to protect life or body integrity of related person who cannot explain his/her consent due to actual impossibility or who does not have legal validity and/or a person except related one,

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personal data can be processed by the company without Explicit Consent

- The case that it is required to process personal data of the parties of the contract, provided that it is directly related to the issuing or execution of a contract
- The case that it is obligatory for the data controller to fulfil his/her legal obligation
- Making it public by related person
- Having data processing obligatory for establishment, use or protection of a right,
- Having data processing obligatory for legitimate interests of the Company provided that it does not harm fundamental rights and freedom of related person

It can be processed in case that it is clearly considered obligatory in the laws in terms of Special Personal Data except personal health data and sexual life or having not explicit consent of related person if it is regarding processing special personal data. Personal data related with health and sexual life, can be processed *only with the purpose of health services and planning and managing its finance, realizing treatment and nursing services*

and medical diagnosis, preventive medicine and protecting public health. Hence, until otherwise is stipulated in LPPD regulations, personal health data and sexual life data can be processed by Work Place Doctor and/or Nurse who is responsible of confidentiality or only within the scope of explicit consent.

4.4. DATA PROCESSING PURPOSES

Your personal data obtained by Inform Elektronik, can be processed within the scopes those explained below:

- Performing obligations arising from the labour contract and legislation for employees
- Planning and executing human resource policies and process
- Conducting occupational health / safety activities
- Conducting communication activities
- Conducting advertisement / campaign / promotion processes
- Conducting product/services marketing processes
- Conducting company/product / services dependency
- Conducting activities for customer satisfaction
- Organization and event management
- Performing marketing analysis studies
- Following-up and conducting legal affairs
- Conducting goods / services procurement processes
- Conducting financing and accounting affairs
- Conducting audit / ethics activities
- Conducting processes of information security management
- Conducting sales and after sales support services

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For conducting commercial and operational activities of Inform Elektronik in future, other categories can be added by us. In such cases, Inform Elektronik will continue to make updates in text related with indicated categories in order to continue notifying you in the quickest way.

4.5. DATA STORAGE AND DISPOSAL

Our company maintains personal data in accordance with minimum periods stipulated in legal regulations that related activity is subjected and the period required for the purpose of processing personal data.

Within this scope, our Company, firstly, determined whether it is stimulated in related regulation to maintain personal data for a period and acts in accordance with that period if it is determined. If there is not a legal period, personal data is stored for a period required for the purpose of processing personal data. At the end of storing period indicated, personal data is destructed with the methods determined (deleting and/or making public) and in accordance with data owner's application of periodical demolition periods.

4.6. DATA TRANSFER AND PROCESSING BY THIRD PERSONS

The company can transfer personal data to a third natural or legal person in accordance with LPPD regulations. In such case, the Company ensures that third persons who received it, follow this Policy. Within this scope, required protective regulations are added to contracts those are issued with third persons.

- Personal data transfer to third persons located in Turkey, can be made by the Company without need for explicit consent in exceptional cases indicated in article 5.2 and article 6.3 of LPPD or via obtaining explicit consent of related person in other cases (LPPD article 5.1 and article 6.2).
- Personal data transfer to third persons located abroad, can be made by the Company without need for explicit consent in exceptional cases indicated in article 5.2 and article 6.3 of LPPD or via obtaining explicit consent of related person in other cases (LPPD article 5.1 and article 6.2). In addition to that, presence of one of below conditions is required in terms of the country where it will be transferred.
 - ✚ Having a foreign country where personal data is transferred, within the status of the countries where sufficient protection is provided, by the Board
 - ✚ In case that a foreign country where transfer will be realized, does not take place in the safe country list of the Board, on condition to obtain permission from the Board by making a written promise regarding that sufficient protection will be provided, by Data Controllers in related country and by the Company

PURCHASER GROUP	DEFINITION AND PURPOSE
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Business Partners and Group Companies	<p>It refers dealers, suppliers and other third persons that our Company receives service or that our Company operates various works and projects together while performing its activities. Group companies refer to the companies those are generally affiliated to main company in terms of management or administration. Data of these purchaser groups, as per required by a legal obligation or as per clearly stipulated in the laws, is transferred via applying to your explicit consent in case it is required or for legitimate interests of our company, obligatory for establishing a right, making it public by related person, being directly related with conducting or executing a contract.</p>
Share Holders and Company Authorities	<p>Company share holders refer to natural and legal persons and board of directors and other authorized persons. Personal data of these purchaser groups, as per required by a legal obligation or as per clearly stipulated in the laws, ensuring our company management and activities performed by our company, is transferred via applying to your explicit consent in case it is required or for legitimate interests of our company, obligatory for establishing a right, making it public by related person, being directly related with conducting or executing a contract.</p>
Suppliers and Other Companies where service is taken	<p>These are third persons those contractual relation is made regarding good or service supply. Data of these purchaser groups, as per required by a legal obligation or as per clearly stipulated in the laws, is transferred via applying to your explicit consent in case it is required or for legitimate interests of our company, obligatory for establishing a right, being directly related with conducting or executing a contract.</p>
Legally Authorized Public Institutions and Organizations	<p>These are state institutions and organizations those have authority to ask information and document as per the laws and they can make data transfer as per article 8 and 9 by abiding principles of article 4 of LPPD to state institutions and organizations. Sometimes, data can be transferred with other security reasons, mainly public security, as per performing legal obligations or legitimate interests of our company.</p>
Legally Authorized Special Persons and Institutions	<p>They refer to private persons and organizations those are authorized to receive information and document legally from our company. Data can be transferred to these purchaser groups as per stimulated clearly in the laws or a legal obligation, with the purpose of being directly related with conducting or issuing a contract and data can be used within the frame of legal authority by legally authorized special persons and institutions.</p>

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4.7. DATA OWNER CLARIFICATION OBLIGATION

Referring to article 10 of LPPD, it is Required to clarify related persons before processing personal data. The notification to be made within mentioned clarification, includes follow elements respectively:

- Identity of data officer and, its representative if any
- The purpose of processing personal data
- To whom and for what purpose personal data can be transferred
- Method and legal reason of personal data collection
- Other rights indicated in article 11 of LPPD

The company makes required notification in case it requests information of related person in accordance with article 11 of LPPD. In order to perform illumination obligation, the Company prepares explicit consent declaration for data processing activities / data categories requiring explicit consent of related person and illumination texts.

4.8. RIGHTS OF DATA OWNERS


The company responds possible requests of related persons indicated below that it holds personal data of these persons in accordance with LPPD regulations.

- Learning whether or not personal data has been processed
- Requesting information on processed personal data, if personal data has been processed
- Learning the purpose of processing personal data and whether or not personal data has been used in accordance with declared purpose
- Knowing third parties at home and abroad, to which the personal data has been transferred
- Requesting correction of personal data, if such data has been processed incompletely or incorrectly,
- Requesting to delete or to demolish personal data in case that reasons requiring processing personal data, is removed or requesting to make it public. Requesting to notify third persons those personal data has been transferred to regarding performed transactions
- Objecting to any consequence that may arise against himself/herself through analysis of processed data exclusively by means of automated systems,
- Requesting compensation of any damages incurred by himself/herself due to unlawful processing of personal data,

Related persons can deliver their requests to e-mail address given below or to mail address given below with a wet signature or they can send them via notary.

In case that related person delivers their requests related with above indicated rights, his/her request is finalized free of charge within at least 30 days. In case that a cost is arisen related with finalizing requests

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by Data Officer, fees taking place in the tariff can be demanded by the Board.

Data Controller: Inform Elektronik San. Tic. A.Ş.

E-mail: tr-iss-sm-kvkk@inform.com.tr

Address: Esenşehir Mah. Hale Sk. No.6/1 Ümraniye / İstanbul 34776

Trade Registration Number: 309012-0

Official Web Address: www.inform.com.tr

KeP Address: inform@hs02.kep.tr

Telephone Number: 0216 622 58 00

4.9. DATA SECURITY

Inform Elektronik takes all types of Technical and Administrative Measures required to provide suitable security level for protecting personal data. The measures stipulated as per article 12-1 of LPPD, serve for the purposes indicated below.

- Preventing to process personal data illegally,
- Preventing to access personal data illegally,
- Ensuring to store personal data

The measures taking within this scope, have been indicated below:

- Network security and practice security are ensured.
- Information technologies systems take security measures within the scope of supply, improvement and maintaining.
- There are disciplinary regulations consisting data security provisions for employees.
- Training and awareness works are performed in certain intervals about data security for employees.
- Authority matrix has been formed for employees.
- Access logs are kept regularly.
- Institutional policies regarding access, information security, usage, storing and demolition, have been prepared and started to practice.
- Confidentiality commitments are made.
- Authorities of employees in this field who make change of job or who quit working, are removed.
- Updated anti-virus systems are used.
- Firewalls are used.
- For personal data transferred on paper, extra security measures are taken and related document is sent on confidential document format.
- Security of environments consisting personal data, is ensured.
- Encoding is made and leakage tests are practiced.

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- Backup programs are used.

4.10. PROCESSING VIDEO RECORDS -CCTV (CLOSED-CIRCUIT TELEVISION)

A CCTV surveillance system is operation in our workplace, and we ensure monitoring and recording videos centrally. The company has ownership and management of related system and the system is operated by IT department.

CCTV is used for public security and property security and preventing and investigating crime. When it is required and requested, this information can be shared with related persons themselves and their representatives, service providers, police force, courts, security organizations and persons perming investigation.

CCTV (Closed-Circuit Television) camera surveillance and record activites are performed by our Company under the Law Regarding Private Security Services and related regulations. This purpose aimed with records is limited with the purposes indicated in this Policy and they are processed within the frame of general principles as per article 4 of LPPD and stored abiding to legal periods.

As per protecting basic rights and freedoms and as per transparency principle, our Company can provide these records to the attention of related person with more than one method performing illumination obligation as per article 10 of LPPD (for instance, hanging warnings/plates on walls- illumination in place- etc.)

4.11. OUR COOKIE POLICY

Surfing on our internet page can cause to process your personal data via cookies. Cookies are small text files placed in your computer by web pages you visit. Our detailed policy takes place in our webpage.

4.12. CHILDREN AND OUR WEBPAGE

Our company is aware of importance of protecting privacy of children on internet environment. Our sites have not been designed for children. Our policy is not to collect or store information purposely regarding anyone below 18 via our internet pages. If you are below 18 years old, you have to take consent of a parent or your guardian to send information via our internet page. Please demand them to examine this information before having contact with us.

This Policy can be changed from time to time by the Company. The company shares changes that it makes on the Policy, to its employees via e-mail and published them on a platform where related persons can access.

5. VALIDITY

This Policy enters into force on **01.05.2020**.

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