

# **Privacy Notice**

## **On the Processing of Personal Data within the Scope of Ethics Hotline Reports**

**Data Controller : Cengiz Holding A.Ş.**

**Address : Altunizade Mah., Kısıklı Cad., No: 37, 34662, Üsküdar, İstanbul / Türkiye**

This Privacy Notice on the Processing of Personal Data within the Scope of Ethics Hotline Reports has been prepared in order to inform you about how personal data included in reports submitted to the Cengiz Holding A.Ş. Ethics Hotline are processed.

The Ethics Hotline has been established to enable the reporting of unethical conduct, allegations of non-compliance with legislation, compliance violations, conflicts of interest, irregularities and similar matters within the scope of Cengiz Holding A.Ş.'s activities.

The Ethics Hotline encourages good faith reporting. Reports that are false, malicious or defamatory in nature may give rise to legal and administrative consequences.

We attach importance to ensuring that you can submit reports freely, comfortably and without hesitation. If you wish, you may choose to remain anonymous or refrain from sharing some or all of your information when submitting a report.

While the personal data you choose to share is entirely subject to your free will and discretion, in the event that you provide your full information, the categories of personal data collected and stored by Cengiz Holding and the purposes for which such data are processed are set out below

### **Purposes and Legal Grounds for Processing Your Personal Data**



#### **Identity Information**

- Personal Data Processed**

Name – Surname

- Purposes of Processing Personal Data**

Conducting Information Security Processes, Conducting Audit / Ethics Activities, Managing Access Authorisations, Conducting / Supervising Business Activities, Providing Information to Authorised Persons, Institutions and Organisations, Fulfilling Legal Obligations

- Legal Grounds for Processing**

Your identity data are processed by Cengiz Holding for the purposes listed above, based on the legal grounds set out in Article 5 of Law No. 6698 and the relevant legislation, namely:

- Processing being mandatory for the data controller to fulfil its legal obligations;
- Processing being necessary for the establishment, exercise or protection of a right;
- Processing being necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

- **Methods of Collection**

Your identity data are collected through the ethics reporting channel, printed documents, electronic communication channels and information and documents declared by you.

**Contact Information**

- **Personal Data Processed**

E-Mail Address, Mobile Phone Number

- **Purposes of Processing**

Conducting Audit / Ethics Activities, Ensuring Compliance with Legislation, Managing Company / Product / Service Loyalty Processes, Conducting Communication Activities, Conducting / Supervising Business Activities, Managing Customer Relationship Processes, Following up Requests / Complaints

- **Legal Grounds for Processing**

Your contact data are processed by Cengiz Holding for the purposes listed above, based on the legal grounds set out in Article 5 of Law No. 6698 and the relevant legislation, namely:

- Processing being mandatory for the data controller to fulfil its legal obligations;
- Processing being necessary for the establishment, exercise or protection of a right;
- Processing being necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

- **Methods of Collection**

Your contact data are collected through the ethics reporting channel, printed documents, electronic communication channels and information and documents declared by you.

## Other Information

- **Personal Data Processed**

E-mail Content, Printed Document Content, Information and Supporting Document Provided Within the Scope of the Request or Report, Employment and Professional Information, Title Information

- **Purposes of Processing**

Conducting Audit / Ethics Activities, Ensuring Compliance with Legislation, Managing Company / Product / Service Loyalty Processes, Conducting Communication Activities, Conducting / Supervising Business Activities, Managing Customer Relationship Processes, Following up Requests/Complaint

- **Legal Grounds for Processing**

Your other information data are processed by Cengiz Holding for the purposes listed above, based on the legal grounds set out in Article 5 of Law No. 6698 and the relevant legislation, namely:

- Processing being mandatory for the data controller to fulfil its legal obligations;
- Processing being necessary for the establishment, exercise or protection of a right;
- Processing being necessary for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.

- **Methods of Collection**

Such data are collected through the ethics reporting channel, printed documents, electronic communication channels and information and documents declared by you.

## Transfer of Personal Data

Your personal data may be shared, limited to the purpose of processing and in accordance with confidentiality principles, with:

- The Legal Directorate and Human Resources Directorate of Cengiz Holding A.Ş.;
- Relevant managers, limited strictly to the scope of the investigation;
- Authorised persons, institutions or organisations for the fulfilment of legal obligations;
- Business partners and service providers for the purpose of obtaining service support, ensuring the continuity of our activities and, where necessary, enabling the investigation of complaints and/or reports.

## Information About Anonymous Reports

Reports submitted through the Ethics Hotline may be made anonymously. In the case of anonymous reports, no attempt is made to identify the reporting person. However, due to the technical operation of electronic systems, certain transaction security logs may be retained.

## Exercise Your Rights Regarding Personal Data

You may submit your requests concerning your rights listed under Article 11 of Law No. 6698 in accordance with Article 13 of the Law and Article 5 of the Communiqué on the Procedures and Principles for Application to the Data Controller, by using the Data Subject Application Form and one of the following methods:

Application Method	Application Address	Required Information / Documents
Written Application	Altunizade Kısıklı Cad. No: 37 34662 Üsküdar, İstanbul / TÜRKİYE	In person with valid identification
Written Application	Altunizade Kısıklı Cad. No: 37 34662 Üsküdar, İstanbul / TÜRKİYE	By sending a signed petition with a copy of identification
Secure Electronic Signature or Mobile Signature	Altunizade Kısıklı Cad. No: 37 34662 Üsküdar, İstanbul / TÜRKİYE	By sending an email using a secure electronic or mobile signature
Application via Registered Electronic Mail (KEP) Address	<a href="mailto:cengizholding.ik@hs03.kep.tr">cengizholding.ik@hs03.kep.tr</a>	By writing "Request for Information under the Personal Data Protection Law" in the subject line

Pursuant to the Communiqué on the Procedures and Principles for Application to the Data Controller, the application must include the applicant's name and surname, signature (if submitted in writing), Turkish ID number (or nationality and passport number or identification number if the applicant is a foreign national), residential or business address for notification, electronic mail address (if any), telephone and fax number (if any), and information regarding the subject matter of the request.

The data subject must clearly and explicitly state the right they seek to exercise. Relevant information and documents concerning the request must also be attached to the Application Form.

The request must relate to the applicant personally. If the application is submitted on behalf of another person, the applicant must be duly authorised and such authorisation must be documented. If the request concerns special categories of personal data, the applicant must be specifically authorised in accordance with Article 10 of the Regulation on Personal Health Data. The application must include identity and address information and supporting identity verification documents.

Requests made by unauthorised third parties on behalf of others shall not be taken into consideration.

### **Response to Your Requests**

Requests regarding your personal data shall be responded to as soon as possible and in any event within thirty (30) days from the date of receipt by Cengiz Holding.