

**MEY ICKI SAN. VE TIC. A.S.**

**POLICY FOR PROTECTION  
AND  
PROCESSING OF PERSONAL DATA**

## **SUBJECT AND PURPOSE OF POLICY:**

Protection of personal data is of high importance for MEY Icki San.Ve Tic.A.S., ("MEY"), and Diageo Plc, the parent company, as well as all affiliates particularly Mey Alkollu Ickiler San. Ve Tic. A.S., and is one of the business priorities of our Company. Protection of the personal data of our employees, business partners, customers, visitors, applicants for vacant positions, and the instructors and students of International Wine And Spirits Academy ("IWSA"), a training institution owned by MEY, as well as any third parties, whose personal data have been processed, constitute the subject matter hereof.

The purpose of this Policy is to set out the activity for processing of any personal data, carried out by MEY, the affiliates thereof, and the training institution owned by MEY (IWSA), as well as the systems adopted for protection of personal data, and to provide information to any individuals, whose personal data have been processed by our Company, for the purpose of protecting, in particular the right of privacy with respect to processing of any personal data, as well as the fundamental rights and freedoms of individuals, and thereby to comply with the Law Nr. 6698 on Protection of Personal Data ("LPPD").

## **APPLICABILITY:**

This Policy applies to any and all personal data which are automatically processed or which are processed by non-automatic means to the extent that they belong to any data recording system. All our employees, and any third persons to whom/which we disclose any personal data, as well as any third persons who/which process any personal data for and on behalf of MEY, are expected to comply with the local regulations, Diageo Global Data Privacy Policy and this Policy. In case of any discrepancy between the applicable regulations, Diageo Global Data Privacy Policy and this Policy, the applicable regulations shall be applicable.

## **DEFINITIONS:**

<b>Explicit consent:</b> shall mean the consent which is granted at free will for a specific matter and which is based on being informed,
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<b>Anonymization:</b> shall mean the process carried out for making it impossible to associate any personal data with any identified or identifiable real person in any manner whatsoever, even by matching with any other data, E.g. Making it impossible to associate any personal data with any real person through data masking, data aggregation, data contamination or any other techniques.
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<b>Information Text:</b> shall mean the text through which the Concerned persons are informed of the methods for collecting personal data, the purpose(s) thereof and the legal grounds therefor as well as the mutual rights and obligations of the same as per the provisions prescribed under the LPPD,
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<b>Application Form:</b> shall mean the form which explains the application submitted by the Concerned persons, the Personal Data owners, to exercise their rights arising from the law against MEY, as well as the method thereof,
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<b>Concerned person(s):</b> shall mean any real person(s), whose personal data have been processed, such as business partners, employees, suppliers, customers, etc.,
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<b>Business Partner:</b> shall mean the parties with which MEY cooperates while maintaining its operations,
<b>Personal data:</b> shall mean any and all kinds of identified or identifiable information of any real person(s); E.g.: Name-surname, TR ID Number, e-mail address, address, passport number, date of birth, etc.,
<b>Processing of personal data:</b> shall mean any and all kinds of processes performed on any data such as collection of personal data by automatic means wholly or partly or by non-automatic means to the extent that they belong to any data recording system, as well as recording, storage, retaining, changing, reforming, disclosing, transmission, taking over, classification thereof, or making the same accessible or preventing them to be used,
<b>Private data:</b> shall mean any and all data of persons such as race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and clothes, membership to any association, foundation or union, health, sexual life, criminal capacity and security measures, as well as any and all biometric and genetic data of the same,
<b>Data Processor:</b> shall mean any real or legal person who/which processes any personal data for and on behalf of the Data Controller basing on the power granted by the same,
<b>Data controller:</b> shall mean any real or legal person who/which determines the purposes and means of processing of any personal data and who/which is responsible for establishment and management of the data recording system,
<b>LPPD:</b> shall mean the Law Nr. 6698 on Protection of Personal Data,
<b>PDP Board:</b> shall mean the Personal Data Protection Board,
<b>PDP Institution:</b> shall mean the Personal Data Protection Institution.

### **Processing of Personal Data:**

Any and all Personal data are processed in accordance with section 4 of the LPPD to the extent that:

- Statutory and integrity principles are observed,
- Any such data are accurate, and up-to-date if and when so required,
- Any such data are processed for specific, explicit and legitimate reasons,
- Any such data are associated with, and limited to the purpose for which they are processed,
- Any such data are retained during the statutory period of time either prescribed under the LPPD or with respect to the purpose for which they are processed.

Any personal data may not be processed without the explicit consent of the concerned person. However; MEY shall be entitled to process any personal data without seeking for the explicit consent of the concerned person in any of the following cases laid down under the LPPD:

- In any cases where it is expressly prescribed under the laws,
- In any cases where it is necessary to protect the life or bodily integrity of the concerned person or any other person, who may not grant her/his consent since it is actually impossible or the consent of whom is not recognized in legal terms,
- In any cases where it is necessary to process any personal data of the parties to the agreement to the extent that it is directly associated with establishment or performance of the agreement,
- In any cases where it is necessary for MEY to fulfill its statutory obligation,
- In any cases where any such data are already made public by the concerned person,
- In any cases where processing of any data is necessary to establish, exercise or protect any right,
- In any cases where processing of any data is necessary for legitimate interests of MEY to the extent that the fundamental rights and freedoms of the concerned person are not damaged.

Accordingly, your personal data are processed by MEY for the following purposes:

- Performance of any and all processes, necessary to ensure that the trainings and services carried out by the training institution owned by MEY (IWSA) as well as the business operations of MEY comply with the applicable regulations and Internal Policies and Procedures, by the concerned departments of MEY, and conduct of the activities accordingly;
- Determination, planning and implementation of the corporate sustainability activities and business policies of MEY;
- Ensuring the legal and commercial security of MEY, the training institution owned by the same (IWSA) and the affiliates of the same, as well as any real or legal persons, with whom/which MEY maintains its business relationship (any administrative operations carried out by MEY, ensuring physical security and inspections of any offices, workplaces, facilities and any other similar locations of MEY, evaluation of the customers of MEY and its affiliates, product vs. complaint management processes, effectiveness management, legal compliance process, internal and external audits, financial affairs, etc.);
- Creation and follow-up of the visitors' records;
- Planning and conduct of any and all kinds of human resources activities of MEY including recruitment, and provision of support for such activities;
- Protection of the commercial standing and the credibility established by MEY, the training institution owned by the same (IWSA), and the affiliates of the same;

- Effectiveness and Compliance Management, as well as internal investigations;
- Conduct of MEY's financial reporting and risk management processes;
- Conduct of MEY's legal affairs;
- Conduct of the corporate management and communication activities;
- Provision of support to the holding company and affiliates with respect to legal compliance;
- Conduct of internal/external audit activities in order to ensure that the policies and procedures of MEY the holding company and the affiliates thereof comply with the applicable regulations;
- Provision of support for conduct of the internal and corporate legal processes of MEY, the holding company and the affiliates thereof;
- Conduct of activities with respect to searching and protection of the corporate reputation;
- Provision of information, arising under the regulations, to the competent authorities.

In the event that any processing activity, performed for the above-mentioned purposes, does not satisfy any of the conditions as stipulated under the LPPD, then, MEY shall obtain your explicit consent with respect to the processing activity.

#### **Requirements to Process Private Data:**

Private data mean any and all data of persons such as race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and clothes, membership to any association, foundation or union, health, sexual life, criminal capacity and security measures, as well as any and all biometric and genetic data of the same.

Any private data may not be processed without the explicit consent of the concerned person.

Any personal data except for the ones in relation to health and sexual life may be processed without seeking for the explicit consent of the concerned person in any cases prescribed under the laws. Any personal data in relation to health and sexual life may be processed by any persons, subject to the non-disclosure obligation, or any authorized institutions and organizations without seeking for the explicit consent of the concerned party for the purposes of protecting public health and carrying out preventive medicine, medical diagnosis, treatment and care services.

MEY acts in compliance with the statutory regulations as prescribed with respect to processing of any private data. Any technical and administrative measures, taken to protect any personal data, are implemented duly with respect to private data, and any and all necessary audits are performed thereto.

#### **Retention Period, Deletion, Disposal and Anonymization of Personal Data:**

MEY retains any personal data during the period of time either as specified under the applicable regulations or as required for the purpose for which they are processed. MEY investigates whether any period of time has been prescribed under the applicable regulations for retention of personal data, and if any, it retains the personal data in accordance with this period of time, and

if not, it retains the personal data for the period of time as required for the purpose for which they have been processed. In the event that such period of time expires or the reasons requiring processing of the personal data disappear, then, any such personal data are deleted, disposed of or anonymized by MEY *ex officio* or upon the request of the Concerned Person.

Deletion processes may be performed by disposing any personal data physically, deleting the same from the software in an unrecoverable manner or seeking support from any 3rd persons with respect to this matter.

Anonymization of any personal data means the process carried out for making it impossible to associate any personal data with any identified or identifiable real person in any manner whatsoever. Once the reasons requiring processing of any personal data, MEY shall be entitled to anonymize such personal data the retention period of which has expired.

### **Transmission of Personal Data:**

Any personal data may be transmitted to any third person to the extent that it is limited with the intended purpose, only in any or more of the following cases prescribed under the LPPD:

- Upon obtaining the explicit consent of the Concerned Person,
- In any cases as permitted under the laws or prescribed under the law,
- In any cases where it is necessary to protect the life or bodily integrity of the concerned person or any other person, who may not grant her/his consent since it is actually impossible or the consent of whom is not recognized in legal terms,
- In any cases where it is necessary to transmit any personal data of the parties to the agreement to the extent that it is directly associated with establishment or performance of the agreement,
- In any cases where it is necessary to transmit any personal data in order to enable that MEY fulfills its statutory obligation,
- If any such data are already made public by the concerned person,
- In any cases where it is necessary to establish, exercise or protect any right,
- In any cases where it is necessary for legitimate interests of MEY to the extent that the fundamental rights and freedoms of the concerned person are not damaged.

MEY may transmit any personal and private data of any personal data owner by taking any and all required security measures and fulfilling its statutory obligations in accordance with the legitimate and legal purposes for processing of any personal data.

MEY may transmit any personal data, managed under this Policy in accordance with the LPPD, to any third persons (business partners, suppliers, customers, concerned employees of MEY İcki San. Ve Tic. A.S., and Diageo Plc., the parent company of MEY İcki San. Ve Tic. A.S., all affiliates of the same, including Mey Alkollu İckiler San. Ve Tic. A.S., as well as shareholders, our direct/indirect domestic/international subsidiaries, consultants, auditors and/or service providers as per the applicable statutory provisions, and any legally authorized institutions and organizations, supervisory and regulatory authorities, legally authorized private legal persons, professional organizations and any other similar organizations, and any persons or organizations permitted by the provisions under the Turkish Code of Commerce and the other applicable regulations, and also any legally authorized public and/or private legal persons to the extent that it is limited to the purpose as requested by the same in accordance with its legal

authority, etc.) in accordance with terms and purposes for processing of any personal data as set out in sections 8 and 9 under the Law.

### **Transmission of Private Data:**

MEY may transmit any private data of any personal data owner to any third person by taking any and all necessary measures, prescribed under the applicable regulations, as well as the sufficient measures stipulated by the PDP Board in the following cases:

- a) In case the personal data owner has granted her/his explicit consent or
- b) In case the personal data owner has not granted her/his explicit consent;
  - Any private data of any personal data owner except for the ones in relation to her/his health and sexual life (*any and all data of persons such as race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and clothes, membership to any association, foundation or union, criminal capacity and security measures, as well as any and all biometric and genetic data of the same*) may be transmitted in any cases prescribed under the applicable laws,
  - Any private data in relation to health and sexual life of any personal data owner may be processed by any persons, subject to the non-disclosure obligation, or any authorized institutions and organizations for the purposes of protecting public health, carrying out preventive medicine, medical diagnosis, treatment and care services, and planning and management of healthcare services and financing thereof.

### **International Transmission of Personal Data:**

MEY, as an international company, may transmit any personal data and private data of any personal data owner to any international third parties or Diageo Plc., the parent company of the same, or its affiliates by taking any and all necessary security measures prescribed under the applicable regulations.

In case the personal data owner has granted her/his explicit consent, or in any of the following cases in case the personal data owner has not granted her/his explicit consent, MEY may transmit any personal data to the foreign countries, announced by the PDP Board to have the sufficient level of protection, or otherwise to the foreign countries, where the data controllers in Turkey and the respective foreign country have committed, in writing, to ensure that a sufficient level of protection would be attained and which are permitted by the PDP Board:

- In any cases as permitted under the laws or prescribed under the law,

- In any cases where it is necessary to protect the life or bodily integrity of the concerned person or any other person, who may not grant her/his consent since it is actually impossible or the consent of whom is not recognized in legal terms,
- In any cases where it is necessary to transmit any personal data of the parties to the agreement to the extent that it is directly associated with establishment or performance of the agreement,
- In any cases where it is necessary to transmit any personal data in order to enable that MEY fulfills its statutory obligation,
- If any such data are already made public by the concerned person,
- In any cases where it is necessary to establish, exercise or protect any right,
- In any cases where it is necessary for legitimate interests of MEY to the extent that the fundamental rights and freedoms of the concerned person are not damaged.

#### **International Transmission of Private Data:**

MEY may transmit any private data of any personal data owner to the Foreign Countries with Sufficient Level of Protection or Data Controller Who Has Committed to Attain Sufficient Level of Protection by taking any and all necessary measures, prescribed under the applicable regulations, as well as the sufficient measures stipulated by the PDP Board in the following cases:

- o In case the personal data owner has granted her/his explicit consent or
- o In case the personal data owner has not granted her/his explicit consent;
  - Any private data of any personal data owner except for the ones in relation to her/his health and sexual life (*any and all data of persons such as race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and clothes, membership to any association, foundation or union, criminal capacity and security measures, as well as any and all biometric and genetic data of the same*) may be transmitted in any cases prescribed under the applicable laws,
  - Any private data in relation to health and sexual life of any personal data owner may be processed by any persons, subject to the non-disclosure obligation, or any authorized institutions and organizations for the purposes of protecting public health, carrying out preventive medicine, medical diagnosis, treatment and care services, and planning and management of healthcare services and financing thereof.

#### **Provision of Information to Data Owner/Concerned Person:**



MEY shall provide information to the Personal Data Owner/Concerned Person while obtaining the personal data, in accordance with the LPPD. Accordingly; MEY shall provide information regarding the identity of its agent, if any, and the purposes for processing of any personal data, the persons to whom/which any processed data will be transmitted for which reasons, the method for collection of any personal data, the legal reasons therefor as well as the rights any personal data owner is entitled to have. Information text shall be announced to all employees in a manner to be accessible by any third parties (corporate website, portal, etc.).

#### **Rights of Data Owner/Concerned Person Arising under the LPPD:**

MEY shall inform any personal data owner of her/his rights under the Obligation to Provide Information, and shall guide the same regarding how to exercise any such rights. MEY shall carry out any and all necessary work flow, administrative and technical arrangements in accordance with the LPPD in order to ensure that the rights of any personal data owner/concerned person are assessed and that information is provided to the personal data owners as necessary.

#### **Rights of Personal Data Owners:**

In the event that any Data Owner/Concerned Person, whose personal data have been processed, submits her/his request, in writing, regarding the below-provided rights, as prescribed under the law, to MEY, MEY shall conclude any such request free of charge within maximum thirty days basing on the nature of the request. However; in case the PDP Board stipulates collection of a charge, then, MEY shall collect the fee, specified under the tariff as determined by the PDP Board, from the applicant. Personal data owners are entitled;

- a. to inquire whether their personal data have been processed, or not; and
- b. to ask for information regarding any such processed personal data; and
- c. to be informed about the purpose of processing of any such data, and also about the fact that whether such data have been used as appropriate to the purpose thereto; and
- d. to be informed about the 3rd parties to which any such data has been transmitted either domestically or internationally; and
- e. to ask for correction of any imperfect or inaccurate data, in case of any imperfect or inaccurate processing thereof, and to ask for providing information regarding any processes, performed for such purpose, to the 3rd parties to which any such personal data has been transmitted; and
- f. to ask for deletion or disposal of any such personal data if the reasons requiring processing of any such data have disappeared in spite of the fact that any such personal data have been processed in accordance with the provisions prescribed under the LPPD and the other applicable laws, and to ask for providing information regarding any processes, performed for such purpose, to the 3rd parties to which any such personal data has been transmitted; and
- g. to raise an objection against such outcome in case of emergence of an outcome that is to the detriment of you upon the analysis of any such processed personal data solely by any automatic systems; and also

- h. to claim for compensation of any and all damage and/or loss they might have incurred in case any such personal data have been processed in breach of the law.

#### **Exercise of Rights by Data Owners/Concerned Persons:**

The Concerned Persons may submit their requests regarding their rights arising under the Law by filling in the Application Form accessible on [www.mey.com.tr](http://www.mey.com.tr) and specifying '**Information Request under the Law on Protection of Personal Data**' in a legible way on the envelope, and then sending the originally signed copy of the same to MEY by the below-given methods or any other methods, provided under the Law on Protection of Personal Data, together with any and all information and documentation to determine their identities:

- a) By application in person, together with the document to authenticate identity of the Data owner, to the address 'Buyukdere Cad., Bahar Sok., No:13 River Plaza K:25-29 34394 Sisli Istanbul'<sup>1</sup>
- b) Through the agency of the notary public to the address 'Buyukdere Cad., Bahar Sok., No:13 River Plaza K:25-29 34394 Sisli Istanbul'
- c) By sending the application form, which has been signed by means of "secure electronic signature" defined under the Law Nr. 5070 on Electronic Signatures by the Applicant, to [meyicki@hs02.kep.tr](mailto:meyicki@hs02.kep.tr), the registered electronic mail (REM) address of the Company.

#### **Process for responding to applications:**

In the event that the Data Owner/Concerned Person submits her/his request to MEY in accordance with the procedure provided hereunder, MEY shall conclude any such request free of charge within maximum thirty days basing on the nature of the request.

MEY may request provision of information/documentation in order to determine that whether the Data Owner/Concerned Person, who has submitted her/his request, is the real owner of the respective personal data, or not, or to ensure security of the Data or to conclude the request of the personal data owner in line with her/his request; and MEY may address additional question(s) in relation to the request of the personal data owner. In the event that the application submitted by the Data owner is possible to hinder the rights and freedoms of any other persons, requires disproportionate effort or that the information is publicly available, then, MEY may reject the respective information request by specifying the justifications thereto.

MEY shall be entitled to reject the application of any applicants in accordance with Section 28 of the LPPD, by specifying the justifications thereto, in the following cases:

- a) In the event that any personal data have been processed for official statistical reasons and for searching, planning and statistical reasons through anonymization of the same,

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<sup>1</sup> In the event that any third persons submit the application for and on behalf of the personal data owners, it is required to submit any such application by means of the **special power of attorney** drawn up and issued in the name of the concerned person by the notary public.

- b) In the event that any personal data have been processed for art, history, literature or scientific purposes or under the freedom of expression to the extent that any such personal data do not violate the national defense, national security, public security, public order, economic security, privacy or personal rights or that any such personal data do not constitute a crime,
- c) In the event that any personal data have been processed under the preventive, protective and informative activities carried out by the public institutions and organizations vested with power and authority by the law with respect to ensuring national defense, national security, public security, public order or economic security,
- d) In the event that any personal data have been processed by the judicial or enforcement authorities with respect to any investigation, prosecution, litigation or enforcement proceedings.

As per section 28/2 of the LPPD; the personal data owners may not raise any claim in respect of their rights in the following cases except for claiming for compensation of any and all damage and/or loss they might have incurred:

- a) In any cases where processing of any personal data is necessary for prevention of committal of an offence, or criminal investigation,
- b) In any cases where any personal data, which have been made public by the personal data owner, are processed,
- c) In any cases where processing of any personal data is necessary for conduct of supervisory or regulatory duties as well as for disciplinary investigations or proceedings by the authorized and competent public institutions and organizations and the professional organizations, bearing the nature of public institution, basing on the power vested thereon by the law,
- d) In any cases where processing of any personal data is necessary to protect the economic and financial interest of the Government with respect to budgeting, taxation and financial issues.

In the event that the application submitted by the Data owner/Concerned Person is possible to hinder the rights and freedoms of any other persons, requires disproportionate effort or that the information is publicly available, then, MEY may reject the respective information request by specifying the justifications thereto.

#### **Right of Personal Data Owners to File Complaints with PDP Board:**

In the event that the application of the concerned person is rejected, or that the response thereto is found unsatisfactory, or that the application is not responded during the granted period of time, the concerned person may file her/his complaint with the PDP Board within thirty days as of the time when her/his application has been responded, and within sixty days as of the date of application in any case, as per section 14 of the LPPD.

#### **Obligations regarding Data Security:**

MEY shall take any and all technical and administrative measures considering the technological capabilities and costs, in order to ensure that any personal data are processed legally. Employees may not process any personal data, they have got familiar with, against the provisions prescribed under the LPPD, and they may not disclose any such data to any other person or use the same for any purpose other than the purpose of processing thereof, and such

obligations of them shall survive even after they leave their duties. Employees shall be informed of the said obligations; and accordingly, any and all necessary covenants shall be obtained from them.

MEY shall take any and all kinds of technical and administrative measures for attaining the satisfactory level of security in order to prevent processing of any personal data in breach of the law, any illegal access thereto and to ensure retention of the same, and it shall perform any necessary audits/have any necessary audits performed accordingly, and use the outcomes of such audits in order to improve the system.

MEY shall take any and all necessary measures to ensure that the business partners and suppliers carry out the processes for processing of any personal data in accordance with the LPPD in order to create awareness with respect to the obligations, arising under the LPPD, in any data-processing third parties such as business partners and suppliers, to which MEY has transmitted any personal data, and it shall impose a contractual obligation on the data-processing third parties in line with the processes they carry out for processing data.

MEY shall take any and all necessary technical and administrative measures in order to ensure that the personal data are retained on secure media, and to prevent that any such data are disposed of, get lost or modified in breach of the law, basing on the technological capabilities and application costs.

In the event that any personal data, which have been processed in accordance with the LPPD, are captured by any other persons in illegal ways, MEY shall report this case to the respective personal data owner and the PDP Board as soon as possible.

MEY shall perform any necessary audits/have any necessary audits performed within its own organization in accordance with the LPPD, and it shall use the outcomes of such audits in order to improve the system.

#### **PROCESSING OF PERSONAL DATA IN MEY'S WORKPLACE, FACILITY ENTRANCES, OFFICES, FACILITIES AND TRAINING INSTITUTIONS:**

MEY shall carry out monitoring activities by means of security camera and personal data processing activity to monitor entries/exits of visitors in MEY's workplace, office, training institutions, facility and all other locations in order to maintain security and for any other legitimate purposes.

MEY intends to protect its interest with respect to maintaining security of the company, employees and any other persons by carrying out monitoring activities by means of security camera. MEY shall carry out the monitoring activity by means of camera in accordance with the Law on Provision of Private Security Services and the applicable regulations. With respect to the monitoring activity by means of camera carried out by MEY; this Policy shall be issued on the website of MEY, this matter shall be covered under the Information Text of MEY, and a notice regarding performance of monitoring activity shall be hanged at the entrances of the locations where the monitoring activity will be performed. The monitoring locations and number of security cameras shall be determined in a manner to be limited to the security purpose. Any locations (such as toilets), which go beyond the security purposes and lead to outcomes to jeopardize the personal rights, shall not be subject to monitoring activity. Any records, which are recorded and retained on digital media, shall be accessible by only a limited number of concerned employees of MEY. Any live footage can only be watched by the concerned employees of MEY and the outsourced security guards. Limited number of persons with access to records shall represent that they shall protect confidentiality of any and all data, they access, under the letter of confidentiality.

Any persons, accessing the locations of MEY as visitors, are provided with visitor cards in exchange for their ID cards, and while obtaining their full names, TR ID numbers, places and dates of birth, the owners of such personal data are informed accordingly by means of the texts hanged on the wall. Any such data, obtained to track entries/exits of visitors, are processed only for these purposes, and the respective personal data are recorded on the data recording system physically.

Access to Internet may be provided to visitors, upon any request thereto, in MEY's workplace, office, training institution or facilities in order to enable that security is maintained by MEY, and for any other legitimate purposes. Accordingly; any log records on your access to Internet are taken under record as per the Law Nr. 5651 and the applicable provisions prescribed under the related regulations promulgated in accordance therewith; and these records are processed only in case any request is made by the competent institutions and organizations thereto or in order to fulfill our statutory obligations during the audit processes to be conducted within the organization of MEY.

The log records, obtained accordingly, are accessible only a limited number of MEY's IT employees. MEY's employees with access to the above-mentioned records shall access such records and disclose the same to the legally authorized persons only in case of any request made by the competent institutions and organizations thereto or in order to utilize them during audit processes. Limited number of persons with access to records shall represent that they shall protect confidentiality of any and all data, they access, under the letter of confidentiality.

MEY shall be entitled to record any and all internet activities performed on its websites by means of technical means (e.g.; cookies, etc.) for the purpose of enabling that any visitors on these sites perform their visits in line with their intended purposes, to be able to display customized contents to them and to carry out online advertising activities. Further information on protection and processing of any personal data with respect to all these activities, carried out by MEY, are provided under the texts of "Privacy Policy of MEY" of the respective websites.

This Policy shall be issued on the website of MEY ([www.mey.com.tr](http://www.mey.com.tr)), and made available for access by the concerned persons upon any request to be made by the personal data owners.