

1. PURPOSE

Girişim Elektrik A.Ş. values the privacy of all individuals who have provided their personal data to the company. Girişim Elektrik A.Ş. collects, stores, and processes Personal Data belonging to individuals such as employees, customers, business partners, suppliers, and other third parties (collectively referred to as "Data Subjects") for various purposes.

This Personal Data Protection Policy (the "Policy") outlines how Girişim Elektrik A.Ş. strives to protect the relevant Personal Data and provides explanations that help us understand the principles governing the use of Personal Data. The Policy also describes how Girişim Elektrik A.Ş. collects, processes, and stores Personal Data in compliance with all applicable laws and regulations, including national regulations with the force of law (collectively referred to as the "Data Protection Law"). Girişim Elektrik A.Ş. aims to protect Data Subjects by obtaining, collecting, handling, sharing, using, and processing Personal Data in accordance with the relevant Data Protection Law. This Policy serves as a guide on how data should be collected, handled, and processed based on its sensitivity and importance.

2. SCOPE

This Policy covers all employees of Girişim Elektrik Taahhüt Tic. ve San. A.Ş., including the management of Girişim Elektrik A.Ş., as well as all affiliates and subsidiaries in the country and regions ("Girişim Elektrik"). This Policy applies to all Employees who process Personal Data (e.g., contact persons for other employees, customers, or business partners).

3. DEFINITIONS

Employees: Refers to all individuals employed or assigned in any capacity within Girişim Elektrik A.Ş. Under this Policy, the term "Employees" also includes the following designations: Board Members, Employees (full-time, fixed-term, part-time, and temporary), and contract workers.

Data Subject: Refers to the individual to whom the Personal Data belongs (e.g., employee, customer, investor, supplier, shareholder, etc.).

Processing: Includes any activity or series of activities performed on Personal Data, such as obtaining, recording, organizing, structuring, altering, retrieving, using, disclosing, deleting, or destroying Personal Data. Processing also encompasses the sharing of Personal Data with third parties or transferring Personal Data to third parties and access to Personal Data held by the Data Controller or Data Processor.

Personal Data Breach: Refers to a security breach that leads to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access to Personal Data. This includes breaches resulting from both accidental and intentional causes.

Personal Data: Refers to any information that relates to an identified or identifiable individual, including information that directly or indirectly identifies a person (e.g., name, salary information, marital status, sickness leave dates).

Data Protection: Refers to the relationship concerning the processing of Personal Data, the relevant privacy expectations, and the existing legal protections.

Data Protection Authority: Refers to independent public authorities in the relevant countries responsible for overseeing the implementation of the Data Protection Law through investigation and corrective powers.

Data Controller: Refers to the natural or legal person who determines the purposes and means of processing Personal Data, establishes practices under the Data Protection Law, and implements policies.

4. POLICY

4.1. Definition and Importance of Data Protection

Data protection is a set of strategies and processes used to ensure the confidentiality, availability, and integrity of data belonging to individuals. All individuals have rights regarding the processing of their Personal Data. In this Policy, the term “Data Protection” refers to the relationship between the collection and processing of Personal Data, the corresponding rights of the Data Subjects, and the existing legal protections for Personal Data under the Data Protection Law.

4.2. Explanations Regarding Personal Data

Personal Data refers to any information about an individual. It includes data that can directly or indirectly identify a person (or a combination of such data). Personal Data may be factual or

may reflect opinions about an individual's actions and behaviors. When collected together, various pieces of information that can identify a specific individual also fall under the definition of Personal Data. Personal Data may include various types of information such as full name, date of birth, email address, phone number, address, physical characteristics, or location data, provided that it is clear or reasonably possible to identify the individual to whom the information belongs. If specified in the applicable Data Protection Law, stricter rules apply to the processing of special categories of Personal Data. "Special Categories of Personal Data" include, but are not limited to, data related to an individual's race or ethnic origin, political opinions, religious or philosophical beliefs, physical or mental health, sexual life, biometric data for uniquely identifying an individual, genetic data, and data related to a person's sexual life or sexual orientation, which may vary according to local laws. Compliance with the rules for processing Special Categories of Personal Data as outlined in applicable laws is required.

4.3. Data Protection Principles

Processing encompasses all types of activities performed on Personal Data, including collection, organization, structuring, storage, alteration, retrieval, use, transfer, combination, restriction, deletion, or destruction, etc. Personal Data can only be collected, processed, and used in accordance with the following general data privacy principles:

- **Accountability:** Girişim Elektrik A.Ş. ensures compliance with the fundamental principles and rules of the Data Protection Law and demonstrates this compliance.
- **Lawfulness, Fairness, and Transparency:** Girişim Elektrik A.Ş. processes Personal Data in a lawful, fair, and transparent manner. Data Subjects are informed about how and why their data is processed (transparency), the processing aligns with the explanation provided to Data Subjects (fairness), and one of the legal bases outlined in the Data Protection Law is used for processing (lawfulness).
- **Purpose Limitation:** Girişim Elektrik A.Ş. specifies the purposes for which Personal Data will be used before data collection and limits the processing of Personal Data to fulfilling these specified purposes only.
- **Data Minimization:** Personal Data is collected only to the extent necessary for the processing purposes and is limited to relevant and adequate information. The duration for which Personal Data is stored is kept to a minimum.

- **Accuracy:** Processes are in place to ensure that Personal Data is accurate and kept up to date.
- **Storage Limitation:** Personal Data is retained only for as long as necessary to identify the Data Subjects for the purposes for which the data was processed.
- **Security/Integrity and Confidentiality:** Girişim Elektrik A.Ş. uses appropriate technical and organizational measures to protect the integrity and confidentiality of Personal Data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

4.3.1. Accountability

Monitoring

Personal Data Breaches or Non-Compliance with Girişim Elektrik A.Ş.'s Legal Responsibilities under the Data Protection Law may have significant consequences. Girişim Elektrik A.Ş. processes all Personal Data in accordance with its legal obligations and Data Protection principles. Failure to meet accountability requirements by Girişim Elektrik A.Ş. may result in not only the risk of non-compliance with the Data Protection Law and other applicable laws but also significant reputational risks.

Girişim Elektrik A.Ş. evaluates compliance with this Policy from two perspectives:

1. Overall compliance with Personal Data protection
2. Effectiveness of Data Protection measures in operational practices

Girişim Elektrik A.Ş. regularly reviews these aspects and ensures that its processes are continuously improved.

Reporting Personal Data Breaches

Girişim Elektrik A.Ş. is responsible for reporting Personal Data Breaches to the relevant Supervisory Authority within 72 hours of becoming aware of the breach, unless otherwise specified by applicable laws.

In the event that a Personal Data Breach involving Personal Data for which Girişim Elektrik A.Ş. (as Data Controller) may be held responsible is suspected, the Compliance Managers must be notified immediately. The Compliance Managers will determine whether external resources are needed. If external resources are necessary, the Compliance Managers will consult with the

relevant person. If the breach poses a risk to Data Subjects, the relevant Supervisory Authority must be notified within 72 hours of learning about the breach, guided by the Compliance Managers, unless otherwise specified by applicable laws.

Training

All Employees must complete Data Protection training appropriate for their assigned position by Girişim Elektrik A.Ş. The Human Resources Department in each country should ensure that new hires receive training as part of the recruitment/onboarding process. Periodic or additional training should be provided when there are significant changes in laws, policies, or procedures.

Responsibility

Each Employee processing Personal Data is responsible for handling and processing Personal Data in accordance with this Policy and the Data Protection Law. Specific positions within Girişim Elektrik A.Ş. have designated responsibilities:

- **The Board of Directors** is ultimately responsible for ensuring that Girişim Elektrik A.Ş. meets its legal obligations.
- **Department Directors** are generally responsible for ensuring and monitoring compliance with the Data Protection Law and any international agreements in all countries where Girişim Elektrik A.Ş. operates within their respective areas. They are also responsible for ensuring that internal regulations and this Policy are applied daily and for taking internal disciplinary actions if necessary.
- The IT Director is responsible for:
 - Ensuring that all systems, services, and equipment used for data storage meet acceptable security standards.
 - Conducting regular checks and scans to ensure that security hardware and software are functioning properly.
 - Evaluating third-party services considered for use in the storage or processing of Personal Data by Girişim Elektrik A.Ş.

Customized Data Protection

Girişim Elektrik A.Ş., Veri Koruma ilkelerinin İşleme faaliyetinin her bir aşamasına dahil edilmesi için dahili süreçleri yapılandırmayı amaçlamaktadır. Özelleştirilmiş Veri Koruma, Girişim Elektrik A.Ş. aims to structure internal processes to integrate Data Protection principles

into every stage of Processing activities. Customized Data Protection means implementing appropriate technical and organizational measures to integrate protection measures into any Processing activity both before and after the Processing. Girişim Elektrik A.Ş. strives to apply suitable technical and organizational measures to ensure the principle of Data Minimization is met, both when determining Processing methods and during Processing.

When designing new systems or processes and/or reviewing or expanding existing systems or processes, a Data Protection Impact Assessment ("DPIA") must be completed before starting a project to ensure that all Data Protection requirements are identified and addressed. If necessary, a full DPIA should be conducted.

4.3.2. Processing in a Lawful, Fair, and Transparent Manner

Girişim Elektrik A.Ş. is responsible for understanding the context in which Personal Data is processed as part of its daily operations and ensuring that processing is carried out fairly and in accordance with the Data Protection Law, with clear explanations provided to Data Subjects.

Girişim Elektrik A.Ş. processes Personal Data at all times in a lawful, fair, and transparent manner, and in accordance with the rights of the Data Subjects.

Regarding third-party suppliers/contractors processing Personal Data on behalf of Girişim Elektrik A.Ş. under the Data Protection Law:

- Girişim Elektrik A.Ş. will engage third-party suppliers/contractors who can demonstrate compliance with the Data Protection Law.
- Girişim Elektrik A.Ş. will implement contractual arrangements with third-party suppliers/contractors that meet the requirements of the Data Protection Law and, if necessary, will prove to local data protection authorities that these legal obligations have been adhered to.

Collection and Notification of Personal Data

Girişim Elektrik A.Ş. will only collect Personal Data when it is necessary for lawful purposes or explicitly permitted.

Girişim Elektrik A.Ş. will collect Personal Data from Data Subjects only under the following circumstances:

- When processing is required by applicable local laws or international agreements,

- When processing is necessary for commercial purposes and for fulfilling contractual obligations with Data Subjects,
- When processing is necessary to protect the [reasonable] legitimate interests of Girişim Elektrik A.Ş. in line with its commercial objectives, provided that the processing does not undermine the rights of the Data Subjects,
- When consent has been obtained from the Data Subjects, and such consent has been given freely and in accordance with applicable local laws,
- When data collection is necessary to protect an essential interest of the Data Subject's life or to prevent serious harm or injury to other individuals in emergency situations,
- For other reasons explicitly permitted by applicable local laws.

Girişim Elektrik A.Ş. will inform Data Subjects in a clear, concise, transparent, understandable, and easily accessible manner about the processing of their Personal Data using plain language.

4.3.3. Purpose Limitation: Processing for Limited Purposes

Personal Data collected for any purpose will generally not be used for a different purpose unless otherwise specified by applicable local laws or the relationship between the parties.

Girişim Elektrik A.Ş. processes Personal Data only for purposes specifically permitted by the Data Protection Law. Data Subjects will be informed as soon as possible about these purposes at the time of collection or shortly thereafter.

4.3.4. Data Minimization: Processing Limited to Adequate, Relevant, and Necessary Data

Personal Data should only be processed in a manner that is reasonably necessary and in accordance with the Data Minimization principles (see Appendix 1 – Data Minimization). Where possible, the use of anonymized data is preferred. When processing Personal Data is necessary, it should be limited to what is adequate, relevant, and necessary for the processing purposes. Only Personal Data required for the successful fulfillment of a specific purpose should be used. Data that is not required for processing purposes should not be collected and/or processed.

4.3.5 Accuracy: Ensuring the Accuracy of Personal Data

Girişim Elektrik A.Ş. aims to have robust systems and processes in place to detect incorrect information and to ensure that inaccurate Personal Data is promptly updated or deleted. Girişim

Elektrik A.Ş. will always strive to keep Personal Data accurate and up-to-date. Data Subjects have the right to request the correction of inaccurate Personal Data about them.

4.3.6 Storage Limitation: Processing and Data Retention Limited to Necessary Period

Personal Data should not be retained for longer than necessary according to the Data Protection Law.

Additionally, Girişim Elektrik A.Ş. will make every reasonable effort to anonymize, delete, or destroy all Personal Data (electronic/paper) that is no longer needed. All Employees should be familiar with the data destruction principles.

4.3.7 Security/Integrity and Confidentiality: Data Security

Girişim Elektrik A.Ş. has implemented adequate security measures to ensure the confidentiality and security of Confidential Information belonging to Data Subjects. Personal Data is subject to an appropriate level of security against potential risks.

Girişim Elektrik A.Ş. has implemented appropriate technical and physical measures to protect Personal Data against accidental or unlawful destruction, loss, damage, unauthorized disclosure or access, and any other unlawful processing (including but not limited to, unnecessary collection) and subsequent processing.

4.4 Rights of Data Subjects

Data Subjects have the right to access general information about their Personal Data and, in some cases, to request the correction and/or deletion of Personal Data under the Data Protection Law. Additionally, where applicable under local laws, Data Subjects also have rights to restrict processing, object to processing, and data portability.

Data Subjects can exercise their rights to access, correct, and/or delete Personal Data, and where applicable, restrict processing, object to processing, and data portability, using the contact details specified in the relevant data protection notices. Additional information may be requested to verify the identity of the Data Subjects.

Data Subjects may withdraw their consent at any time, with effect for the future.

Girişim Elektrik A.Ş. will respond to requests to exercise Data Subjects' rights without undue delay and, unless otherwise required by local laws, within 30 calendar days of receipt of the request.

4.5 Data Transfers

As a global organization, Girişim Elektrik A.Ş. may transfer collected data across borders. Personal Data may be shared with other group companies and third-party companies as reasonably necessary and in accordance with local laws.

When there is a need to transfer Personal Data to other companies, Girişim Elektrik A.Ş. will ensure that such transfers are always based on a lawful purpose. These companies may be Girişim Elektrik A.Ş. group entities or third-party companies processing data on behalf of Girişim Elektrik A.Ş.

In cases where companies are engaged by Girişim Elektrik A.Ş. to process data on its behalf, Girişim Elektrik A.Ş. will collaborate only with data processors that provide appropriate technical and administrative measures meeting Girişim Elektrik A.Ş.'s standards and the requirements of the Data Protection Law. Data processing agreements will be signed to hold data processors accountable.

Additionally, Girişim Elektrik A.Ş. will comply with applicable legal restrictions and requirements for cross-border data transfers.

4.6 Implementation, Monitoring, and Enforcement

Each Girişim Elektrik A.Ş. company, through its appropriate bodies, will be responsible for adopting and implementing this Policy and ensuring that it is applied and monitored, including considering stricter or specific local legal requirements and applying local directives, guidelines, and relevant documents and processes.

All Girişim Elektrik A.Ş. employees should receive training on general data privacy principles in accordance with their responsibilities and functions related to personal data processing.

Compliance Managers will facilitate compliance with the Data Protection Law and will serve as the contact points for data protection matters and questions for both employees and third parties, including the Data Protection Officer.

Compliance Managers are generally responsible for monitoring data protection project processes and the daily implementation of this Policy.

4.7 Consequences of Policy Violations

Compliance with this Policy and obligations under the Data Protection Law is essential for Girişim Elektrik A.Ş. Violations of this Policy may result in disciplinary actions, including termination of employment.

4.8 Data Protection Officer

Girişim Elektrik A.Ş. companies that are required to appoint a Data Protection Officer under Data Protection Laws will appoint such an officer. The Data Protection Officer will be appropriately and timely involved in all matters related to the protection of Personal Data under the Data Protection Law.

4.9 Policy Changes

This Policy, which belongs to the Legal and Compliance Department, will be reviewed and amended from time to time to reflect changes in applicable laws and Girişim Elektrik A.Ş.'s business requirements.

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