

**OPLOG OPERASYONEL LOJİSTİK**  
**ANONİM ŞİRKETİ PERSONAL DATA**  
**PROTECTION AND PROCESSING**  
**POLICY**

## **OPLOG OPERASYONEL LOJİSTİK ANONİM ŞİRKETİ PERSONAL DATA PROTECTION AND PROCESSING INFORMATION FORM**

**Document Name:**

Oplog Operasyonel Lojistik A.Ş. Data Protection and Processing Policy

**Target Group:**

All real persons, except the employees of Oplog Operasyonel Lojistik A.Ş., whose personal data are processed by Oplog Operasyonel Lojistik A.Ş.

**Prepared by:**

Oplog Operasyonel Lojistik A.Ş. Personal Data Protection Board

**Approved by:**

Oplog Operasyonel Lojistik A.Ş. Personal Data Protection Supreme Board.

**Effective date:**

01.06.2020

<b>I. Contents</b>	
<b>1. SECTION 1– INTRODUCTION.....</b>	<b>3</b>
1.1 Introduction.....	3
1.2 Scope.....	3
1.3 Implementation of the Policy and Related Legislation.....	3
1.4 Enforcement of the Policy.....	3
<b>2. SECTION 2 – ISSUES RELATING TO THE PROTECTION OF PERSONAL DATA .....</b>	<b>4</b>
2.1. Ensuring the Security of Personal Data .....	4
2.2. Protection of Sensitive Personal Data .....	4
2.3. Supervision and Increasing Awareness of Business Units on the Protection and Processing of Personal Data.....	4
<b>3. SECTION 3 – ISSUES RELATING TO THE PROCESSING OF PERSONAL DATA .....</b>	<b>4</b>
3.1. Processing of Personal Data in Compliance with the Principles Established in the Legislation .....	4
3.2. Personal Data Processing Conditions.....	5
3.3. Processing of Sensitive Personal Data .....	6
3.4. Informing of Data Subjects.....	6
3.5. Transfer of Personal Data .....	7
<b>4. SECTION 4 – CATEGORIZATION OF PERSONAL DATA PROCESSED BY OUR COMPANY AND THE PURPOSE OF PROCESSING .....</b>	<b>8</b>
<b>5. SECTION 5 – STORAGE AND DISPOSAL OF PERSONAL DATA.....</b>	<b>8</b>
<b>6. SECTION 6 – RIGHTS OF DATA SUBJECTS AND THE USE OF THESE RIGHTS .....</b>	<b>9</b>
6.1. Rights of Data Subjects.....	9
6.2. Usage of Rights of Data Subjects.....	9
6.3. Our Company's Response to Applications.....	9
<b>7. SECTION 7 – SPECIAL CASES WHERE PERSONAL DATA IS PROCESSED.....</b>	<b>9</b>
7.1. Personal Data Processing inside and at Entrances to the Building / Facility and for Visitors to the Website ..	9
7.2. Camera Monitoring Activities at Entrances to the Buildings / Facilities of Oplog and Inside the Buildings .....	9
7.3. Monitoring of Visitors Entering and Leaving the Buildings/Facilities of Oplog .....	10
<b>8. SECTION 8 – RELEVANCE OF OPROG'S PERSONAL DATA PROTECTION AND PROCESSING POLICY WITH OTHER POLICIES.....</b>	<b>10</b>
<b>APPENDIX 1 – Purposes of Personal Data Processing .....</b>	<b>11</b>
<b>APPENDIX 2 – Data Subjects .....</b>	<b>13</b>
<b>APPENDIX 3 – Categories of Personal Data .....</b>	<b>14</b>

## 1. SECTION 1– INTRODUCTION

### 1.1 Introduction

The protection of personal data is one of the main priorities of Oplog Operasyonel Lojistik Anonim Şirketi ("**Oplog**" or "**Company**") and it strives to comply with all applicable laws in this regard. Under Oplog Operasyonel Lojistik Anonim Şirketi's Policy on the Protection and Processing of Personal Data ("**Policy**"), the principles applied in the execution of the processing activities of personal data carried out by our company and the compliance of the data processing activities of our company with the provisions set out in Personal Data Protection Law No. 6698 ("**Law**") are explained and our company maintains transparency by informing data subjects. Fully aware of our responsibilities in this regard, your personal data shall be processed and protected under this policy.

### 1.2 Scope

This policy applies to all personal data of persons other than employees of our company that is processed, in whole or in part, by automated or non-automated means, provided that it is part of a data recording system. Detailed information on the respective data subjects can be obtained from the ANNEX 2 ("*Annex 2 - Data Subjects*") documents attached to this Policy.

Oplog's activities related to the protection of personal data of our employees are managed in accordance with the Policy on Protection and Processing of Personal Data of Employees of Oplog Anonim Şirketi, which was drafted in parallel with the principles of this Policy.

For details on personal data processing activities conducted by our company for **Oplog** employee candidates or Oplog employees, please refer to the Personal Data Protection and Processing Policy for Employee Candidates and Oplog's Personal Data Protection and Processing Policy for its Employees.

### 1.3 Implementation of the Policy and Related Legislation

The relevant statutory regulations on the processing and protection of personal data are primarily applicable. In the event of a discrepancy between the applicable legislation and the Policy, our Company accepts that the applicable legislation shall take precedence. The Policy regulates the rules established by the relevant laws by embedding them within the scope of business practices.

### 1.4 Enforcement of the Policy

The effective date of this policy is 06/01/2020 as set by Oplog, and the version that went into effect on October 7, 2016 and was updated on December 30, 2016 was renewed as of the effective date of this policy.

This policy is posted on Oplog's website at <https://www.oplog.io/> and made available to data subjects upon request by personal data holders.

## **2. SECTION 2 – ISSUES RELATING TO THE PROTECTION OF PERSONAL DATA**

### **2.1. Ensuring the Security of Personal Data**

Pursuant to Article 12 of the Law, depending on the nature of the data to be protected, our company shall take the necessary measures to prevent unlawful disclosure, access, transfer or security breaches that may otherwise occur. In this regard, our Company takes administrative measures to ensure the required level of security in accordance with the guidelines published by the Personal Data Protection Board ("**Board**") and conducts or arranges for inspections to be conducted.

### **2.2. Protection of Sensitive Personal Data**

Certain personal data are given special importance under the law because of the risk of victimization or discrimination if processed unlawfully. This relates to data on race, ethnicity, political thought, philosophical belief, religion, sect or other persuasions, appearance, association, foundation or union memberships, health, sex life, criminal convictions and security measures, and biometric and genetic data.

Oplog acts with extra care in the protection of sensitive personal data designated by law as "exclusive" processing it in accordance with the law. In this context, Oplog's technical and administrative measures for the protection of sensitive personal data are carefully implemented with necessary audits carried out within Oplog.

For detailed information on the processing of sensitive personal data, please refer to 3.3 of this Policy ("*Processing of Sensitive Personal Data*").

### **2.3. Supervision and Increasing Awareness of Business Units on the Protection and Processing of Personal Data**

Oplog provides the necessary training for business units to prevent the illegal processing of personal data and illegal access to personal data and to raise awareness about the protection of personal data.

Oplog sets up the necessary systems to raise its employees' awareness of personal data protection and works with consultants when necessary. Accordingly, our company evaluates the participation in the relevant training, seminars, and information sessions and updates and renews its training content in keeping up with any updates to the relevant legislation.

## **3. SECTION 3 – ISSUES RELATING TO THE PROCESSING OF PERSONAL DATA**

### **3.1. Processing of Personal Data in Compliance with the Principles Established in the Legislation**

#### **3.1.1. Legally Compliant Data Processing that Upholds the Principle of Integrity**

Oplog acts in accordance with the principles of the law and the general rule of trust and integrity in the processing of personal data. In this context, personal data is processed to the extent required by and limited to the business activities of our company.

### **3.1.2. Keeping Personal Data Accurate and Up to Date as Needed**

Oplog shall take the necessary measures to ensure that Personal Data is accurate and up to date throughout their Processing and shall establish the necessary mechanisms to ensure the accuracy and timeliness of Personal Data for specific periods.

### **3.1.3. Processing for Specific, Explicit and Legitimate Purposes**

Oplog clearly sets out the purposes for which personal data are processed and processes them for these purposes within the scope of its business activities.

### **3.1.4. Limited and Controlled Processing of Data in Compliance with Data Processing Purposes**

Oplog collects personal data to the extent required by its business activities and processes them in strict compliance with the specified purposes.

**3.1.5. Retention for as long as necessary in compliance with the purpose of processing or as provided in the relevant legislation** Oplog retains personal data for lengths of time required by the purpose for which they are processed as well as for the minimum period of time specified in the legislation to which the activity in question is subject. In this regard, our company first determines whether the relevant legislation provides a time limit for the storage of personal data and if so, it acts in accordance with that time limit. If there is no legal time limit, personal data are stored for a length of time required by the purpose for which they are processed. At the end of the specified retention periods, personal data are destroyed in accordance with regular cycles of data destruction or at the request of the data subject using the specified destruction methods (erasure and/or destruction and/or anonymization).

## **3.2. Personal Data Processing Conditions**

Apart from the explicit consent of the data subject, the basis for the processing of personal data may be only one of the conditions listed below, or more than one condition may be the basis for the processing of the same personal data. If the processes data is sensitive personal data, the conditions in Section 3.3 ("*Processing of Sensitive Personal Data*") of this Policy shall apply.

### **i. Explicit Consent of the Data Subject**

One of the conditions for processing personal data is the explicit consent of the data subject. The express consent of the data subject must be disclosed on a specific subject, within the data subject's information, and with free will.

In the presence of the following conditions for the processing of personal data, personal data may be processed without the express consent of the data subject.

### **ii. Explicitly provided in law**

If the processing of the personal data of the data subject is expressly required by law, that is, if there is a clear provision in the relevant law on the processing of personal data, the existence of this data processing condition may come into question.

### **iii. Failure to Obtain the Express Consent of the Data Subject Due to Actual Impossibility**

The personal data of the data subject may be processed if doing so is necessary for the protection of the life or physical integrity of the person or someone else who cannot give his consent due to actual impossibility or whose consent cannot be granted validity.

#### **iv. Closely Related to the Establishment or Performance of the Contract**

When the processing of personal data is necessary, this condition may be considered to have been met if it is directly related to the conclusion or performance of a contract to which the data subject is a party.

#### **v. Fulfillment of the Company's Legal Obligations**

Personal data of the data subject may be processed if the processing is necessary for our company to fulfill its legal obligations.

#### **vi. Making Public of Personal Data by the Data Subject**

If the data subject has made his/her personal data public, the personal data in question may be processed strictly for the purpose of making it public.

#### **vii. Obligatory Data Processing for the Establishment or Protection of a Right**

In case data processing is necessary for the assertion, exercise, or safeguarding of a right, the personal data of the data subject may be processed.

#### **viii. Obligatory Data Processing for the Legitimate Interests of our Company**

Provided that the fundamental rights and freedoms of the data subject are not affected, the personal data of the data subject may be processed if the data processing is necessary for the legitimate interests of our company.

### **3.3. Processing of Sensitive Personal Data**

Sensitive personal data may be processed by our company in accordance with the principles established in this policy, taking all necessary administrative and technical measures, including methods to be determined by the Board, and in the presence of the following conditions:

- (i) Sensitive personal data other than that related to health and sexual life** may be processed without the express consent of the data subject if expressly provided in the laws, that is if a provision regarding the processing of personal data is provided by the law to which the relevant activity is subjected. Otherwise, the explicit consent of the data subject shall be obtained in order to process sensitive personal data.
- (ii) Sensitive personal data related to health and sexual life** may be processed for the purposes of public health protection, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, by individuals or authorized institutions and organizations under the obligation of confidentiality without requiring explicit consent. Otherwise, the explicit consent of the data subject shall be obtained in order to process sensitive personal data.

### **3.4. Informing of Data Subjects**

Oplog informs data subjects in accordance with Article 10 of the Law and other legislation pertaining thereunto. In this regard, Oplog informs the data subjects about who is the data controller and for what purposes the personal data are processed, to whom they are disclosed, the methods by which they are collected, the legal grounds for it, and the rights of the data subjects in the context of the processing of their personal data.

**3.5. Processing of Personal Data Processed by Oplog Lojistik by Relevant Departments** Personal data processed by the Human Resources, Accounting, and Purchasing Departments may also be processed by Oplog in order to make sure the data processed by Oplog Logistics are also processed by the relevant Department, to carry out its activities in accordance with the Group's policies, objectives and strategies, and to protect its rights, interests and reputation. Oplog Operasyonel Lojistik informs the data subject that personal data may be sent to the relevant department at the stage of collection of personal data when the disclosure of personal data occurs in the context of the transfer of personal data from one data controller to the other under the law.

### **3.6. Transfer of Personal Data**

Our company may transfer the personal data and sensitive personal data of the data subject to third parties (third-party companies, public and private authorities, third real persons) by taking the necessary security measures in strict compliance with the purposes for which it processes personal data, in accordance with the law. Accordingly, our company acts in accordance with the regulations set forth in Article 8 of the Law. For detailed information on this topic, please refer to document ANNEX 4 ("*ANNEX 4 - Third Parties to Which Personal Data are Transferred by Our Company and Purposes of the Transfer*") of this Policy.

#### **3.6.1 Transfer of Personal Data**

Even without the express consent of the data subject, personal data may be disclosed to third parties in the presence of one or more of the conditions listed below by our company whereby all necessary security measures are implemented, including the methods prescribed by the Board, with due diligence.

- The relevant activities regarding the transfer of personal data being clearly regulated by the laws,
- The transfer of personal data by the Company being directly related and necessary for the establishment or performance of a contract,
- The transfer of personal data being mandatory for our company to fulfill its legal obligations,
- Limited transfer of personal data by our company for the purpose of making public, provided that the personal data has already been made public by the data subject,
- The transfer of personal data by the Company being mandatory for the establishment, exercise or protection of the rights of the Company or the data subject or third parties,
- Being obliged to carry out personal data transfer activities for the legitimate interests of the company, provided that the fundamental rights and freedoms of the data subject are not affected,
- To protect the life or physical integrity of the person or another person who cannot give consent due to actual impossibility or whose consent is not legally valid.

In addition, in the event of the fulfillment of any of the above-cited conditions, personal data may be transferred to countries that have been declared by the Board to provide adequate protection ("**Foreign Countries with Adequate Protection**"). In the absence of adequate protection, they may be transferred abroad in accordance with the conditions for data transfer established by law, if the data controllers in Turkey and in the respective foreign country agree in writing on adequate protection and if the Board has given its permission ("**Foreign Country in Which the Data Controller Provides Adequate Protection**").



### 3.6.2 Transfer of Sensitive Personal Data

Sensitive personal data may be transferred by our company in accordance with the principles established in this policy, **taking all necessary administrative and technical measures, including methods to be determined by the Board, and in the presence of the following conditions:**

- (i) **Sensitive personal data other than that related to health and sexual life** may be processed without the express consent of the data subject if expressly provided in the laws, that is if a provision regarding the processing of personal data is provided by the law to which the relevant activity is subjected. Otherwise, the explicit consent of the data subject shall be obtained.
- (ii) **Sensitive personal data related to health and sexual life** may be processed for the purposes of public health protection, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, by individuals or authorized institutions and organizations under the obligation of confidentiality without requiring explicit consent. Otherwise, the explicit consent of the data subject shall be obtained.

In addition, personal data may be transferred abroad to **Countries that Provide Adequate Protection** if any of the afore-cited conditions are met. In the absence of adequate protection, they may be transferred to the **Foreign Country in which the Data Controller Provides Adequate Protection** in line with the data transfer conditions stipulated in the legislation.

## 4. SECTION 4 – CATEGORIZATION OF PERSONAL DATA PROCESSED BY OUR COMPANY AND THE PURPOSE OF PROCESSING

In accordance with the purposes of the processing of personal data by our company, based on and limited to at least one of the conditions for processing personal data set out in Articles 5 and 6 of the Law, and by notifying the data subjects in accordance with Article 10 of the Law and secondary legislation, personal data shall be processed in accordance with the general principles set out in the Law, including the principles set out in Article 4 of the Law. Within the purposes and conditions specified in this Policy, detailed information on the categories of processed personal data can be found in document ANNEX 3 ("*ANNEX 3 - Categories of Personal Data*") of the Policy.

For detailed information on the purposes of the processing of personal data, please refer to ANNEX 1 of the Policy ("*Annex 1 - Purposes of Processing of Personal Data*").

## 5. SECTION 5 – STORAGE AND DISPOSAL OF PERSONAL DATA

Our company retains personal data for lengths of time required by the purpose for which they are processed and in accordance with the minimum periods specified in the legislation to which the activity in question is subject. In this regard, our company first determines whether the relevant legislation provides a time limit for the storage of personal data and if so, it acts in accordance with that time limit. If there is no legal time limit, personal data are stored for a length of time required by the purpose for which they are processed. At the end of the specified retention periods, personal data are destroyed in accordance with regular cycles of data destruction or at the request of the data subject using the specified destruction methods (erasure and/or destruction and/or anonymization).

## **6. SECTION 6 – RIGHTS OF DATA SUBJECTS AND THE USE OF THESE RIGHTS**

### **6.1. Rights of Data Subjects**

Data subjects have the following rights:

- (1) Learning whether their personal data has been processed or not,
- (2) Requesting information if their personal data have been processed,
- (3) Learning the purposes for the processing of personal data and whether they are used in accordance with the intended purposes,
- (4) Learning about the third parties to whom personal data is transferred at home or abroad,
- (5) Requesting rectification of any incomplete or inaccurate data and notification to third parties to whom their personal data have been transferred, regarding the procedure carried out in this respect,
- (6) Requesting the erasure or destruction of personal data in the event that the reasons requiring it to be processed have disappeared despite the fact that it is processed in accordance with the provisions of the law and other relevant laws, and requesting the notification of third parties, to whom the personal data has been transferred, about the procedure,
- (7) Objecting to a negative outcome in case of the analysis of the processed data exclusively through automated systems,
- (8) Requesting compensation for damages in case of any loss due to unlawful processing of personal data.

### **6.2. Usage of Rights of Data Subjects**

Data subjects may submit their requests regarding their rights listed in section 6.1 ("*Rights of Data Subjects*") to our Company through the methods determined by the Board. Accordingly, they can use the "Oplog Data Subject Application Form", which can be accessed at <https://www.oplog.io/>

### **6.3. Our Company's Response to Applications**

Our company takes the necessary administrative and technical measures to finalize the applications made by the data subject in accordance with the Law and secondary legislation.

In case the data subject submits its request regarding its rights in section 6.1. ("*Rights of Data Subjects*") to our Company in accordance with the procedure, our Company shall process the relevant request free of charge as soon as possible and within 30 (thirty) days at the latest, depending on the nature of the request. However, if the transaction incurs any additional costs, a fee may be charged in accordance with the tariff determined by the Board.

## **7. SECTION 7 – SPECIAL CASES WHERE PERSONAL DATA IS PROCESSED**

### **7.1. Personal Data Processing inside and at Entrances to the Building / Facility and for Visitors to the Website**

To ensure security, Oplog conducts personal data processing activities to monitor its buildings and facilities with security cameras and monitor guests entering and leaving the buildings/facilities.

### **7.2. Camera Monitoring Activities at Entrances to the Buildings / Facilities of Oplog and Inside the Buildings**

To ensure security in its buildings and facilities, Oplog conducts camera surveillance in accordance with the Private Security Services Act and relevant legislation.

Oplog conducts monitoring activities with security cameras to ensure security in its buildings and facilities for the purposes specified in the relevant legislation and in accordance with the conditions for processing personal data specified in the Law.

Oplog shall inform the data subject in accordance with Article 10 of the Law about camera surveillance using several methods. In addition, Oplog processes personal data in a limited and appropriate manner in connection with the purpose for which it is processed, in accordance with Article 4 of the Law.

The purpose for Oplog's continuation of video camera surveillance activities is limited to the purposes set forth in this policy. Accordingly, the surveillance areas, the number of surveillance cameras, and the timing of their monitoring are implemented in such a way that they are sufficient to achieve the intended security purposes and limited to this extent. Areas that may cause an invasion of a person's privacy that exceeds security objectives (e.g., restrooms) are not subject to monitoring.

Only a limited number of Oplog employees have access to live recordings and digitally recorded and preserved recordings. A limited number of persons with access to the records undertake that they shall protect the confidentiality of the data they access by signing a confidentiality agreement.

### **7.3. Monitoring of Visitors Entering and Leaving the Buildings/Facilities of Oplog**

Olog conducts personal data processing activities to monitor the entry and exit of guests to/from Oplog's buildings and facilities, to ensure security, and for the purposes stated in this policy.

When receiving the names and surnames of people who come to Oplog's buildings as guests, or through the texts published in Oplog or otherwise made available to guests, data subjects are informed in this regard. The data obtained for the purpose of tracking the entry and exit of guests is processed only for this purpose and the corresponding personal data is recorded in the data collection system in a physical environment.

## **8. SECTION 8 – RELEVANCE OF OPLOG'S PERSONAL DATA PROTECTION AND PROCESSING POLICY WITH OTHER POLICIES**

Olog establishes basic policies for Oplog as well as sub-policies for internal use for the protection and processing of personal data that relate to the principles set forth in this Policy.

The aim is to reflect the principles of Oplog's internal policies in public policies to the relevant extent, to inform relevant parties in this framework, and to ensure transparency and accountability regarding the personal data processing activities carried out by Oplog.

## APPENDIX 1 – Purposes of Personal Data Processing

MAIN OBJECTIVES (PRIMARY)	SUB-OBJECTIVES (SECONDARY)
<b>Planning and Execution of the Company's Human Resources Policies and Processes</b>	Execution of Recruitment Processes
<b>Carrying out of the Necessary Work by our Responsible Business Units for the Execution of Trading Activities Carried Out by the Company and the Execution of the Related Business Processes</b>	Event Management
	Planning and Execution of Corporate Communication Activities
	Planning, Auditing and Execution of Information Security Processes
	Establishment and Management of Information Technologies Infrastructure
	Follow-up of Finance and/or Accounting Affairs
	Planning and Execution of Corporate Sustainability Activities
	Planning and/or Execution of Efficiency/Effectiveness and/or Expediency Analysis of Business Activities
Planning and Execution of Corporate Governance Activities	
<b>Planning and Execution of the Company's Commercial and/or Business Strategies</b>	Management of Relationships with Business Partners and/or Suppliers
	Execution of Strategic Planning Activities
<b>Planning and Execution of Human Resources Policies and Processes of Group Companies</b>	Employee Request and Complaint Management
	Planning of analysis and improvement activities regarding Group Companies' wage management
	Planning and supporting the processes of providing fringe benefits to Group Employees
	Supporting the wage management planning activities of Group employees
	Planning and supporting the training and career development processes of Group employees
	Planning and managing processes to increase the satisfaction and loyalty of Group employees

	Planning and/or Execution of Intern and/or Student Procurement, Placement and Operation Processes
<b>Strategic Human Resources Planning for Group Companies, Backup Processes and</b>	Managing the processes regarding the performance evaluations of Group employees

<b>Supporting Organizational Development Activities</b>	Supporting the development and backup planning activities of Group Companies
	Supporting the management of the appointment and promotion processes of personnel and managers within the Group Companies
<b>Maintaining the Confidence Oplog's Reputation Inspires in Business and Consumers</b>	Efforts around the Protection of the Reputation of Group Companies and Group Values
	Follow-up of Group Customer Requests and/or Complaints
	Planning and/or Execution of Corporate Social Responsibility and/or NGO Activities
	Planning and Execution of Processes for the Loyalty and Satisfaction of Group and Stakeholder Employees
<b>Oplog A.Ş. Planning and Execution of Audit Activities</b>	Supporting Group Companies' fraud reporting and investigation processes
	Planning and Execution of Audit Activities in Order to Ensure That Activities of the Group Companies are Carried out in Accordance with the Group Procedures and Related Legislation
<b>Ensuring the legal, technical and commercial-occupational safety of the Company and the persons who have a business relationship with the Company</b>	Follow-up of Legal Affairs
	Creating and Tracking Visitor Records
	Planning and Execution of Operational Activities Required for Ensuring that Company Activities are Carried out in Accordance with Company Procedures and/or Relevant Legislation
	Ensuring the Security of Company Fixtures and/or Resources
	Ensuring the Security of Company Operations
	Giving Information about the Legislation to Authorized Institutions
	Realization of Corporate and Partnership Law Transactions
	Supporting Group Companies in the Realization of Company and Partnership Law Transactions
Ensuring Data is Accurate	

	and Up-to-Date
	Ensuring the Security of Company Sites and/or Facilities
	Planning and Execution of Company Audit Activities

## APPENDIX 2 – Data Subjects

DATA SUBJECT CATEGORY	DESCRIPTION
<b>Group Company Customer</b>	Natural persons whose personal data are obtained through business relationships in the context of operations carried out by Oplog's business units whether or not they have a contractual relationship with Oplog
<b>Visitor</b>	Real persons who entered Oplog's physical compounds for various purposes or who visited our websites
<b>Employee Candidate</b>	Real persons who applied for employment with Oplog in any manner or made their resume and related information available to Oplog.
<b>Group Employee</b>	Employees of Oplog companies whose personal data is processed as part of activities carried out by Oplog, such as employee satisfaction, human resources, auditing, information technology security and infrastructure, regulatory compliance etc.
<b>Family Members and Relatives</b>	Spouses, children and relatives of data subjects whose personal data are processed within the scope of this Policy within the framework of the activities carried out by Oplog
<b>Third Party</b>	Other real persons not covered by this Policy and Personal Data Protection and Processing Policy for Oplog Employees (e.g. guarantor, companion, former employees)
<b>Oplog Supplier</b>	Natural persons who are agents or shareholders of Oplog's service providers in the performance of Oplog's commercial activities in accordance with Oplog's orders and instructions on a contractual basis.
<b>Company Shareholder</b>	Real persons who are shareholders of Oplog
<b>Company Representative</b>	Oplog's board members and other authorized natural persons
<b>Employees, Shareholders and Officials of the Institutions We Cooperate With</b>	Natural persons, including employees and shareholders and officials of institutions (including but not limited to business partners, suppliers, etc.) with whom Oplog has a business relationship



### APPENDIX 3 – Categories of Personal Data

PERSONAL DATA CATEGORIZATION	PERSONAL DATA CATEGORIZATION DESCRIPTION
<b>ID Information</b>	Data containing information about the identity of the person: full name, T.R. identification number, nationality, place of birth, date of birth, gender, employment information, registration number, tax number, title, resume, etc. as well as information and documents such as driver's license, professional ID card, identity card and passport
<b>Contact Details</b>	Information such as phone number, address, e-mail address, fax number
<b>Transaction Security Information</b>	Your personal data processed in order to ensure our technical, administrative, legal and commercial security during the execution of our activities (e.g., log records, IP information, identity verification information)
<b>Transaction Information</b>	Data such as survey information, statement information, purchase information, call center records, membership information, cookie records processed to protect the legal and other interests of the Company and the data subject in connection with the activities carried out by Oplog in the context of services provided
<b>Information about Family Members and Relatives</b>	Information about the family members of the data subject (e.g. spouse, mother, father, child), relatives and other persons who can be contacted in case of emergency, in connection with the services provided within the scope of activities performed by Oplog or in order to protect the legal and other interests of the Company and the data subject
<b>Information about the Security of Physical Spaces</b>	Personal data regarding the records and documents taken at the entrance to physical spaces, during the stay in the said physical space, camera records, vehicle information records and records taken at the security point etc.
<b>Financial Information</b>	Personal data processed for information, documents and records showing all types of financial results, created according to the type of legal relationship that Oplog has established with the data subject, as well as data such as bank account number, IBAN number, income information, debt/credit information

<b>Audio/Visual Information</b>	Photographs and camera recordings (excluding recordings within the scope of Physical Space Security Information) and voice recordings
<b>Corporate Memory Information</b>	Information such as memories, interviews, etc., processed as part of the activities performed by Opllog to create Opllog's corporate memory
<b>Sensitive Personal Data</b>	Data on racial or ethnic origin, political opinion, belief, religion, sect or other persuasions, appearance, membership in associations, foundations or trade unions, health, sex life, criminal convictions and security measures, as well as biometric and genetic data
<b>Legal Proceeding and Compliance Information</b>	Personal data processed in the context of the identification, follow-up and fulfillment of our legal claims and rights, as well as compliance with our legal obligations and the policies of our company
<b>Audit and Inspection Information</b>	Personal data processed regarding the execution of our company's operational, financial, fraud and compliance audit activities
<b>Request/Complaint Management Information</b>	Personal data regarding the receipt and evaluation of any request or complaint addressed to Opllog

## APPENDIX 4 – Third Parties to which Personal Data is Transferred by Our Company and Purposes of Transfer

In accordance with Articles 8 and 9 of the Personal Data Protection Law, the personal data of data subjects managed by this Policy may be transferred to the following categories of persons by Oplog:

- (i) Oplog's partners,
- (ii) Oplog's suppliers,
- (iii) Oplog companies,
- (iv) Legally Authorized public institutions and organizations
- (v) Legally authorized private legal persons

The scope of the above-mentioned persons to whom data has been transferred and the data transfer purposes are stated below.

Persons to whom Data can be Transferred	Definition	Purposes of Data Transfer
<b>Business partner</b>	Parties with which Oplog enters into business partnerships while carrying out its commercial activities to render i.e. single/joint projects, receive services from etc.	Limited to the fulfillment of the purposes for which the business partnership was established
<b>Supplier</b>	Defines the service providers of Oplog on a contractual basis in accordance with Oplog's orders and instructions while carrying out its commercial activities.	Limited to the provision of services that Oplog outsources from the supplier and that are necessary to carry out Oplog's business activities.
<b>Legally Authorized Public institutions and Organizations</b>	Public institutions and organizations entitled to receive information and documents from Oplog in accordance with the provisions of the relevant legislation	Limited to the purpose required by the relevant public institutions and organizations within the scope of their legal powers
<b>Legally Authorized Private Legal Persons</b>	Private legal persons entitled to receive information and documents from Oplog in accordance with the provisions of the relevant legislation	Limited to the purpose requested by the private legal entities concerned within the scope of their legal powers