

M.A.C. YARN FABRIC TEKS. SAN. A.Ş. A.S.
POLICY ON THE PROTECTION OF SENSITIVE PERSONAL DATA

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1. ENTRANCE

1.1. PURPOSE AND SCOPE OF THE POLICY

The Law No. 6698 on the Protection of Personal Data ("Law") entered into force on April 7, 2016; This M.A.C. İPİK FABRIC TEKS. SAN. A.Ş. A.S. ("M.A.C." or the Company") The Policy on the Protection of Sensitive Personal Data ("Policy") aims to ensure compliance and to determine the principles to be followed by the Company in fulfilling its obligations regarding the protection and processing of sensitive personal data.

The policy sets out the conditions for processing sensitive personal data and sets out the main principles adopted by the Company in the processing of personal data. In this context, the Policy covers all personal data processing activities carried out by the Company within the scope of the Law, the owners of all personal data processed by the Company and all personal data processed.

1.2. ENFORCEMENT AND AMENDMENT

The Policy has been published by the Company on its website and presented to the public. In case of conflict with the legislation in force, especially the Law, and the regulations in this Policy, the provisions of the legislation shall apply.

The Company reserves the right to make changes to the Policy in line with legal regulations. The current version of the Policy [can be accessed from the Company's website](https://mactextile.com.tr) <https://mactextile.com.tr>

2. SENSITIVE PERSONAL DATA

It refers to data on race, ethnicity, political opinions, philosophical belief, religion, sect or other beliefs, disguise and dress, membership of associations, foundations or unions, health, sexual life, criminal convictions and security measures, and biometric data.

2.1. PROCESSING OF SENSITIVE PERSONAL DATA

In the processing of personal data determined as "special quality" by the Law, our company strictly complies with the regulations stipulated in the Law. In Article 6 of the Law, a number of personal data that carries the risk of causing victimization or discrimination when processed unlawfully is determined as "special quality". These data; race, ethnicity, political opinion, philosophical belief, religion, sect or other beliefs, disguise and dress, association, foundation or union membership, health, sexual life, criminal conviction and security measures, and biometric and genetic data.

By our Company in accordance with the law; Sensitive personal data is processed in the following cases, provided that adequate measures to be determined by the KVK Board are taken:

The Company may process sensitive personal data in the following cases by ensuring that additional measures determined by the Personal Data Protection Board are taken:

The second paragraph of Article 6 of the Law on the Protection of Personal Data dated 24/3/2016 and numbered 6698 has been repealed and the third paragraph has been amended as follows. Accordingly, as of June 1, 2024, sensitive personal data;

- Having the explicit consent of the person concerned,
- It is clearly stipulated in the laws
- It is mandatory for the protection of the life or bodily integrity of the person who is unable to express his consent due to actual impossibility or whose consent is not legally valid,
- Regarding the personal data made public by the person concerned and in accordance with the will to make it public,
- It is mandatory for the establishment, exercise or protection of a right
- It is required by persons or authorized institutions and organizations under the obligation of confidentiality for the purpose of protecting public health, conducting preventive medicine, medical diagnosis, treatment and care services, and planning, management and financing of health services,
- It is mandatory for the fulfillment of legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance,
- Foundations, associations and other non-profit organizations or formations established for political, philosophical, religious or trade union purposes, provided that they comply with the legislation and purposes to which they are subject, limited to their fields of activity and not disclosed to third parties; It is aimed at current or former members and members or persons who are in regular contact with these organizations and formations

can be processed in.

Before June 1, 2024, sensitive personal data were processed and transferred under the following conditions;

- ***Processing of sensitive personal data other than health and sexual life***, if the person concerned gives explicit consent or if it is clearly stipulated in the laws
- ***Personal data related to health and sexual life, but only for*** the purpose of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, by persons or authorized institutions and organizations under the obligation of confidentiality, without seeking the explicit consent of the person concerned.

2.2. TRANSFER OF SENSITIVE PERSONAL DATA

As a rule, our company does not transfer sensitive personal data. However, our Company takes the necessary care, takes the necessary security measures and takes adequate measures stipulated by the KVK Board; In line with the legitimate and lawful personal data processing purposes, it may transfer the sensitive personal data of the person concerned to third parties in the following cases.

The second paragraph of Article 6 of the Law on the Protection of Personal Data dated 24/3/2016 and numbered 6698 has been repealed and the third paragraph has been amended as follows. Accordingly, as of June 1, 2024, sensitive personal data;

- Having the explicit consent of the person concerned,
- It is clearly stipulated in the laws

- It is mandatory for the protection of the life or bodily integrity of the person who is unable to express his consent due to actual impossibility or whose consent is not legally valid,
- Regarding the personal data made public by the person concerned and in accordance with the will to make it public,
- It is mandatory for the establishment, exercise or protection of a right
- It is required by persons or authorized institutions and organizations under the obligation of confidentiality for the purpose of protecting public health, conducting preventive medicine, medical diagnosis, treatment and care services, and planning, management and financing of health services,
- It is mandatory for the fulfillment of legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance,
- Foundations, associations and other non-profit organizations or formations established for political, philosophical, religious or trade union purposes, provided that they comply with the legislation and purposes to which they are subject, limited to their fields of activity and not disclosed to third parties; It is aimed at current or former members and members or persons who are in regular contact with these organizations and formations

can be transferred as .

Before June 1, 2024, sensitive personal data were transferred under the following conditions;

- ***Processing of sensitive personal data other than health and sexual life***, if the person concerned gives explicit consent or if it is clearly stipulated in the laws
- ***Personal data related to health and sexual life, but only for*** the purpose of protecting public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, by persons or authorized institutions and organizations under the obligation of confidentiality, without seeking the explicit consent of the person concerned.

2.3. TRANSFER OF SENSITIVE PERSONAL DATA ABROAD

As a rule, our company does not transfer sensitive personal data abroad.

- ***In case of transfer of personal data to third parties abroad, the following rules apply.***

Personal data may be transferred abroad by data controllers and data processors in the presence of one of the conditions specified in Articles 5 and 6 of the Law and if there is an adequacy decision about the country where the transfer will be made, the sectors within the country or international organizations.

Personal data may be transferred abroad by data controllers and data processors in the absence of an adequacy decision, provided that one of the conditions specified in Articles 5 and 6 exists, and the person concerned has the opportunity to exercise his rights and apply for effective legal remedies in the country where the transfer will be made, provided that one of the following appropriate safeguards is provided by the parties:

- The existence of an agreement that is not in the nature of an international contract between public institutions and organizations or international organizations abroad and public institutions and organizations in Turkey or professional organizations in the nature of public institutions, **and the transfer is allowed by the Board.**
- The existence of binding company rules approved by **the Board, which contain provisions on the protection of personal data, which are obliged to be complied with by the companies within the group of undertakings engaged in joint economic activities.**

- The existence of a standard contract **announced by the Board, which includes issues such as data categories, purposes of data transfer, recipient and recipient groups, technical and administrative measures to be taken by the data buyer, additional measures taken for sensitive personal data.**
- The existence of a written undertaking **with provisions to provide adequate protection** and authorization of the transfer by the Board.

In the absence of an adequacy decision and if any of the appropriate safeguards described above cannot be provided, **it may transfer personal data abroad only in the presence of one of the following situations, provided that it is incidental:**

- The person concerned gives explicit consent to the transfer, provided that he is informed about the possible risks.
- The transfer is mandatory for the performance of a contract between the data subject and the data controller or for the implementation of pre-contractual measures taken at the request of the data subject.
- The transfer is mandatory for the establishment or performance of a contract between the data controller and another natural or legal person for the benefit of the data subject.
- The transfer is necessary for an overriding public interest.
- The transfer of personal data is mandatory for the establishment, exercise or protection of a right.
- The transfer of personal data is mandatory for the protection of the life or bodily integrity of the person who is unable to disclose his consent due to actual impossibility or whose consent is not legally valid.
- Making a transfer from a registry that is open to the public or to persons with a legitimate interest, provided that the conditions required to access the registry in the relevant legislation are met and the person with a legitimate interest requests it.

The guarantees set forth in this Law are also provided by the data controller and data processors in terms of subsequent transfers of personal data transferred abroad and transfers to international organizations, and the provisions of this article are applied.

Without prejudice to the provisions of international conventions, personal data can only be transferred abroad with the permission of the Board by taking the opinion of the relevant public institution or organization, in cases where the interests of Turkey or the person concerned will be seriously harmed.

2.4. PROTECTION OF SENSITIVE PERSONAL DATA

Our company acts sensitively in the protection of sensitive personal data that are determined as "special quality" by the Law and processed in accordance with the law. In this context, the technical and administrative measures taken by our Company for the protection of personal data are carefully implemented in terms of sensitive personal data and necessary audits are provided within our Company.

In addition, technical and administrative measures are taken to ensure the appropriate level of security with the measures determined by the Personal Data Protection Board in terms of sensitive personal data.

The general principle of our company is that it does not process sensitive personal data unless there are reasons arising from the law.

Sensitive personal data that is not necessary is deleted or obfuscated.

Accordingly, systematic rules for the security of sensitive personal data are determined in this policy;

2.4.1. MEASURES FOR EMPLOYEES INVOLVED IN THE PROCESSING OF SENSITIVE PERSONAL DATA

- Regular trainings are provided on the law and related regulations and special quality personal data security.
- Confidentiality agreements are signed.
- The scope of authorization and authorization processes of the users who are authorized to access the data are defined with the AUTHORIZATION MATRI.
- Authorization checks are carried out periodically.
- Employees who have a change in their jobs or leave their jobs are immediately removed from their authorizations in these areas.
- If inventory has been allocated to the employee, it is immediately withdrawn.

2.4.2. FOR ELECTRONIC ENVIRONMENTS WHERE SENSITIVE PERSONAL DATA IS PROCESSED AND STORED

- Your data is stored using cryptographic methods.
- Cryptographic keys are kept securely and in different environments.
- Security updates of the environments where the data is located are constantly monitored.
- If the data is accessed through the software, the user authorization of this software is made.
- Necessary safety tests are carried out and test results are recorded.
- In case of remote access to data, a two-step authentication system is used.

2.4.3. FOR PHYSICAL ENVIRONMENTS WHERE SENSITIVE PERSONAL DATA IS PROCESSED AND STORED

- Necessary security measures are taken regarding entry and exit to physical environments containing sensitive personal data.
- The security of physical environments containing sensitive personal data against external risks (fire, flood, etc.) is ensured.

2.4.4. MEASURES REGARDING THE TRANSFER OF SENSITIVE PERSONAL DATA

- If transferred via e-mail, the corporate e-mail address or Registered Electronic Mail (KEP) account is used.
- If the portable memory is transferred via media such as CD, DVD, it is encrypted with cryptographic methods - when necessary - and the cryptographic key is kept in a different environment.
- When transferring between servers in different physical environments, transfer is made by establishing a VPN between servers or by SFTP method.

Necessary precautions are taken against risks such as theft, loss, or viewing by unauthorized persons while transferring in paper form, and documents are sent in a sealed envelope in the format of "confidential documents".