



GLOBAL PRIVACY AND DATA PROTECTION POLICY

1. PURPOSE AND SCOPE

This PENTHOL Personal Data Protection Framework Policy ("Policy"), which is a part of PENTHOL Code of Conduct, personally It aims to determine and coordinate the compliance methods being carried out in order to ensure compliance with the legislation regarding the protection and regulation of collected data. The purpose of this ability is to ensure that the PENTHOL's personal data processing methods are maintained in accordance with the principles of legality, honesty and transparency.

PENTHOL's employees and managers are obliged to act in accordance with this Policy. Our Business Partners are also expected to act in accordance with the principles and principles in this Policy to the extent applicable to the relevant transactions.

2. DEFINITIONS

"Explicit Consent" Consent regarding a specific issue, based on information and expressed with free will.

"Anonymization" Making personal data impossible to associate with an identified or identifiable natural person in any way, even by matching it with other data.

"Relevant Person" The natural person whose personal data is processed (customers, visitors, suppliers and business partners, employees and employee candidates, etc.).

"Business Partners" includes suppliers, customers, contractors, business partners and all kinds of representatives, subcontractors and consultants acting on behalf of the PENTHOL and other third parties with whom PENTHOL does business.

"Personal Data" Any information regarding an identified or identifiable natural person.

"Processing of Personal Data" Obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available personal data by fully or partially automatic or non-automatic means provided that it is part of any data recording system. Any action performed on data, such as classifying or preventing its use.

"Legislation" means all the relevant legislation in force in Turkey and relevant countries regarding the protection of personal data, especially the Personal Data Protection Law No. 6698.

"Special Category Personal Data" Data regarding race, ethnic origin, political thought, philosophical belief, religion, sect or other beliefs, appearance, association, foundation or union membership, health, sexual life, criminal conviction and security measures, as well as biometric and genetic information. The data is special quality data.

“VERBIS” Data Controllers Registry Information System.

“Data Processor” is a natural or legal person who processes personal data on behalf of the data controller, based on the authority given by the data controller.

“Data Controller” is the natural or legal person who determines the purposes and means of processing personal data and is responsible for establishing and managing the data recording system.

3. GENERAL PRINCIPLES

Violation of this Policy may have serious consequences for PENTHOL, its relevant managers and employees, including legal, administrative and criminal sanctions depending on the legislation in the region where it operates, and most importantly, it may cause serious damage to the reputation of PENTHOL Group.

One of the most important issues for PENTHOL is to comply with the Legislation and the general principles stipulated in the Legislation in the processing of personal data. In this context, PENTHOL is expected to act in accordance with the principles listed below in the processing of personal data in accordance with the legislation.

PENTHOL carries out the personal data processing processes carried out within the scope of its activities in accordance with the PENTHOL Group global Personal Data Protection and Processing Policy.

4. OUR COMMITMENTS

As PENTHOL, to achieve our goals with the Global Privacy and Data Protection we have determined;

“Processing in accordance with the Law and Good Faith”

Personal data are processed in accordance with the general rule of trust and honesty so as not to harm the fundamental rights and freedoms of individuals. Within this framework, personal data are processed to the extent and limited to the extent required by the business activities of our Company.

“Ensuring that Personal Data is Accurate and Up-to-Date When Necessary”

PENTHOL takes the necessary measures to ensure that personal data is accurate and up-to-date during the processing period and necessary to ensure the accuracy and timeliness of personal data for certain periods of time mechanisms.

“Processing for Specific, Explicit and Legitimate Purposes”

PENTHOL clearly sets out the purposes of processing personal data and processes it within the scope of purposes related to these activities in line with business activities.

“Being relevant, limited and proportionate to the purpose for which they are processed”

PENTHOL collects personal data only to the extent and quality required by its business activities and limited to the specified purposes.

“Preservation for the Period Stipulated in the Relevant Legislation or Required for the Purpose for which they are Processed”

PENTHOL retains personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the relevant legislation. In this context, our Company first determines whether a period is stipulated for the storage of personal data in the relevant Legislation, and if a period is determined, it acts in accordance with this period. If there is no legal period, personal data are stored for the period required for the purpose for which they are processed. Personal data are destroyed at the end of the specified storage periods in accordance with the periodic destruction periods or in accordance with the data owner's application and with the specified destruction methods (deletion and/or destruction and/or anonymization).

“Obligation to Keep VERBIS Up-to-Date”

PENTHOL has fulfilled its obligation to register with VERBIS and updates its information in VERBIS within seven days from the date of change in case of changes in the registered information. It is the responsibility of the Finance and Accounting Department to make updates upon the notifications of the relevant units.

“Obligation to Inform Relevant Persons”

In accordance with the Legislation, PENTHOL informs personal data subjects about who is the data controller of their personal data, for what purposes it is processed, with whom it is shared for what purposes, by which methods it is collected and its legal reason and the rights of data subjects within the scope of processing their personal data.

A list of personal data collection channels is kept up-to-date by the Chief Legal and Compliance Counsel and shared with PENTHOL Legal and Compliance Counsel every 6 months (June-December).

“Obligation to Ensure the Security of Personal Data and Audit”

In accordance with the legislation, PENTHOL takes the necessary measures, depending on the nature of the data to be protected, to prevent unlawful disclosure, access, transfer of personal data or security deficiencies that may occur in other ways. In this context, PENTHOL takes administrative measures and carries out inspections or has them carried out to ensure the necessary security level in accordance with the legislation.

5. TRAINING

Finance and Accounting Department provides trainings on legislation to employees within the scope of the measures.

6. IMPLEMENTATION, REVIEW AND ENFORCEMENT

Our Global Privacy and Data Protection (GPDP) Policy was approved by the General Manager on 30.11.2022 and entered into force.

If you become aware of any action that is thought to be contrary to this Policy, the applicable legislation, PENTHOL Code of Conduct and our other published standards and policies, our Company's Human Resources Department may be contacted.

PENTHOL Human Resources Department will examine this policy on a regular basis, taking into account the current requirements and changes to our operating conditions. After approval of our President on the basis of a recommendation by PENTHOL Human Resources Department, amendments considered to be necessary shall take effect. In order to ensure that this Policy is observed and regularly followed-up on possible violations and suspicious situations identified as part of improvements, our President shall be in charge at the highest level.

Criminal sanctions may be applied according to the provisions of regarding legislation if any violations or suspicious situation are detected that is contrary to the principles laid down in this Policy.

PENTHOL GPDP Policy shall be made available to all our stakeholders, including employees, through our company website and intranet.