

Document Information	
<u>_ Document Name</u>	Personal Data Protection Policy
<u>... Document Relevance</u>	The purpose of the Personal Data Protection Policy is BST Betonstar Yedek Parça Makine San. ve Tic. Inc. by planning the processes for the protection of personal data and determining the principles to be applied in this regard.
<u>_ Release date</u>	05.10.2020
<u>_ Version Number</u>	one
<u>_ Reference / Rationale</u>	Law No. 6698 on Protection of Personal Data and other legislation
<u>_ Approval Authority</u>	BST Betonstar Spare Parts Machinery Industry. ve Tic. Inc. Board of Directors

**BST Betonstar Spare Parts Machinery Industry. ve Tic. Inc.
CORPORATE PERSONAL DATA PROTECTION POLICY**

1. AIM

Every individual's right to demand the protection of his personal data is a sacred right arising from the Constitution. Betonstar Spare Parts Machinery Industry. ve Tic. Inc. We consider fulfilling the requirements of this right as one of our most valuable duties. For this reason, we attach importance to the legal processing and protection of your personal data.

The Corporate Personal Data Protection Policy has been prepared in order to determine the principles and procedures we apply while processing and protecting personal data as a result of the importance we attach to the protection of personal data.

2. SCOPE

Policy, BST Betonstar Spare Parts Machinery San. ve Tic. AS' Obtaining, recording, storing, preserving, changing, rearranging, disclosing, transferring, taking over, making available, of all personal data managed by us, wholly or partially, by automatic or non-automatic means provided that it is a part of any data recording system , It covers all kinds of operations performed on data such as classification or prevention of use.

Policy, BST Betonstar Spare Parts Machinery San. ve Tic. AS' It relates to all processed personal data of partners , officials, customers, employees, supplier officials and employees and third parties.

BST Betonstar Spare Parts Machinery Industry. ve Tic. Inc. It may change the Policy in order to comply with the legislation and the decisions of the Personal Data Protection Authority and to better protect personal data.

3. DEFINITIONS and ABBREVIATIONS

Abbreviation	Definitions
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Buyer Group	Natural or legal person category to whom personal data is transferred by the data controller
Open Consent	Consent on a particular subject, based on information and expressed with free will
Anonymization	Even by matching personal data with other data, it is in no way an identified or identifiable fact. making it unrelated to the person
Related person	Natural person whose personal data is processed
Related User	Except for the person or unit responsible for technical storage, protection and backup of data Persons who process personal data within the organization of the data controller or in line with the authorization and instruction received
Destruction	Deletion, destruction or anonymization of personal data www.akkasgroup.com
Law/KVKK	Law No. 6698 on the Protection of Personal Data
Recording Media	Fully or partially automated or non-automated, provided that it is part of any data recording system. Any environment where the processed personal data is located
Personal Data	Any information relating to an identified or identifiable natural person
Your Personal Data Processing	Being a part of any data recording system that is fully or partially automated or obtaining , recording, storing, preserving, changing, rearranging, disclosure , transfer, takeover, making available, classifying or preventing use. any operation performed on data
Board	Personal Data Protection Board
Organisation	Personal Data Protection Authority
Special Qualified Personal Data	Race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, dress and dress, with data on association , foundation or union membership, health, sexual life, criminal conviction and security measures. biometric and genetic data
Periodic Destruction	In the event that all the conditions for processing personal data in the Law are eliminated deletion, destruction to be carried out ex officio at repetitive intervals and specified in the personal data retention and destruction policy or anonymization
Policy	Personal Data Protection Policy Kkasgroup.com
Data Inventory	Personal data processing activities carried out by data controllers depending on their business processes; personal data processing purposes and legal reason, data category, transferred recipient group and data subject group The maximum retention period necessary for the purposes for which personal data are processed and created by associating with the data subject by explaining the personal data that is foreseen to be transferred to foreign countries and the measures taken regarding data security

	their detailed inventory
Data Processor	The 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	The natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment of the data processing system

4. GENERAL PRINCIPLES

BST Betonstar Spare Parts Machinery Industry. ve Tic. Inc. It checks the compliance of the data to be processed with the following principles during the preparation phase of the workflow that requires each new personal data processing. Workflows that are not suitable will not be implemented.

BST Betonstar Spare Parts Makine San. ve Tic. Inc. when processing personal data;

(I) Complies with the law and honesty rules.

(II) Ensures that personal data is correct and up-to-date when necessary.

(III) It takes care that the purpose of the processing is specific, clear and legitimate.

(IV) It controls that the processed data is related to the purpose of processing, that it is processed as limited as it needs to be processed and that it is measured.

(V) It preserves the data only as long as required by the relevant legislation or for the purpose of processing, and destroys it when the purpose of processing ceases.

5. Measures Taken for Data Security

BST Betonstar Spare Parts Machinery Industry. ve Tic. Inc. (i) to prevent the unlawful processing of personal data, (ii) prevent unlawful access to personal data, (iii) take all necessary technical and administrative measures to ensure the appropriate level of security in order to ensure the protection of personal data.

5.1. Technical Measures

- Network security and application security are provided.
- Security measures are taken within the scope of procurement, development and maintenance of information technology systems .
- Access logs are kept regularly.
- Current anti-virus systems are used.
- Firewalls are used.
- Necessary security measures are taken regarding entry and exit to physical environments containing personal data.
- The security of physical environments containing personal data against external risks (fire, flood, etc.) is ensured.
- The security of environments containing personal data is ensured.
- Personal data is backed up and the security of the backed up personal data is also ensured.
- User account management and authorization control system are implemented and these are also followed.
- Log records are kept without user intervention.
- Encryption is done.

5.2. Administrative Measures

- There are disciplinary regulations that include data security provisions for employees.
- Training and awareness activities are carried out periodically for employees on data security.
- Institutional policies on access, information security, use, storage and destruction have been prepared and started to be implemented.
- Data masking is applied when necessary.
- Confidentiality commitments are made.

- An authorization matrix has been created for employees.
- The authorizations of employees who have a change in duty or quit their job in this field are removed.
- The signed contracts contain data security provisions.
- Personal data security policies and procedures have been determined.
- Personal data security is monitored.
- Personal data is reduced as much as possible.
- Existing risks and threats have been identified.
- Protocols and procedures for special quality personal data security have been determined and implemented.
- If sensitive personal data is to be sent via e-mail, it must be sent in encrypted form and using KEP or corporate mail account.
- Awareness of data processing service providers on data security is provided.

6. Rights of the Data Subject Regarding Personal Data

The contact person is BST Betonstar Yedek Parça Makine San. ve Tic. A.Ş. and request the following matters:

- Learning whether personal data is processed or not,
- If personal data has been processed, requesting information about it,
- To learn the purpose of processing personal data and whether they are used in accordance with the purpose,
- Learning the third parties whose personal data are transferred in the country or abroad,
- Requesting correction of personal data in case of incomplete or incorrect processing and requesting notification of the transaction made within this scope to third parties to whom personal data has been transferred,
- Requesting the deletion, destruction or anonymization of personal data in case of disappearance of the reasons requiring processing, although it has been processed in accordance with the provisions of the KVKK and other relevant laws, and requesting the notification of the transaction made within this scope to the third parties to whom the personal data has been transferred,
- Objecting to the emergence of a negative result by analyzing the processed data exclusively through automated systems,
- To request the compensation of the damage in case of loss due to unlawful processing of personal data.

7. VIOLATION NOTICES

BST Betonstar Spare Parts Machinery Industry. ve Tic. Inc. employees report to the Board of Directors any work, action or phenomenon that they think violates the KVKK provisions and/or the Policy . After this violation notification, the Board of Directors convenes if it deems necessary and creates an action plan regarding the violation.

If the violation has occurred through the unlawful obtaining of personal data to others, the Board of Directors will resolve this situation within **72 hours within the scope of the Board's decision dated 24.01.2019 and numbered 2019/10. notifies the relevant person and the Board.**

8. CHANGES

By preparing the changes on the policy, BST Betonstar Yedek Parça Makine San. ve Tic. Inc. It is submitted to the approval of the Board of Directors. The updated Policy can be sent to employees via e-mail or posted on the website.

9. EFFECTIVE DATE

of the Policy was approved by the Board of Directors on 05.10.2020 and entered into force.