

Kale Jet Engines

PROTECTION OF PERSONAL DATA POLICY

1. Purpose

The protection of personal data and ensuring privacy have been adopted as part of the corporate culture at KALE JET MOTORLARI SANAYİ A.Ş. (here in after referred to as "Kale Jet Motorları" or "the Company"). The Company exerts maximum care and effort to process and protect personal data of individuals in accordance with the applicable legal norms and universal principles of law within the scope of its activities. The Company exerts maximum care and effort to process and protect personal data of individuals in accordance with the applicable legal norms and universal principles of law within the scope of its activities.

2. Scope

This policy pertains to the personal data of individuals other than our employees, which is processed by our Company, acting as the Data Controller, through fully or partially automated means or non-automated means, as part of a data recording system. The Personal Data Protection Policy (PDP Policy) illustrates how the principles and rules set forth by the relevant legislation are applied in the Company's processes for protecting personal data. This Policy outlines the Company's general policy and processes regarding the processing and protection of personal data. The disclosure obligation under Article 10 of the Personal Data Protection Law is fulfilled through the relevant disclosure texts that will be provided to data subjects on a case-by-case basis.

The applicable legislation, secondary regulations, and universal principles of law are primarily the framework that will govern the protection and lawful processing of personal data in this area. In the event of a conflict between our PDP Policy and the applicable regulations, the prevailing regulations shall apply.

3. Definitions and Abbreviations

3.1. Definitions

PDP Policy: The Personal Data Protection and Processing Policy adopted by the Company.

Explicit Consent: Consent that is given freely and based on information for a specific matter.

Obligation to Inform: The Company's responsibility to provide information to Data Subjects during the collection of personal data, in compliance with Article 10 of the Personal Data Protection Law (PDP Law) and the Communiqué on Procedures and Principles for Fulfilling the Obligation to Inform.

Employee(s): Workers employed under the Labor Law, and students/graduates undergoing mandatory/optional internship training with Kale Jet Motorları.

Data Subject, Data Owner: Individuals whose personal data are processed by the Company or by persons/institutions authorized on behalf of the Company.

Destruction: The irreversible deletion, destruction, or anonymization of personal data.

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Personal Data: Any data related to an identified or identifiable natural person.

Anonymization of Personal Data: The process of rendering personal data irreversibly anonymous, such that it cannot be linked to an identified or identifiable individual, even when combined with other data.

Deletion of Personal Data: The process of making personal data permanently inaccessible and unusable by authorized users.

Destruction of Personal Data: The process of making personal data permanently inaccessible, irretrievable, and unusable by anyone.

Processing of Personal Data: Any operation performed on personal data, whether fully or partially automated, or non-automated if part of a data recording system. This includes collecting, recording, storing, preserving, modifying, rearranging, disclosing, transferring, acquiring, retrieving, classifying, or preventing the use of personal data.

Special Categories of Personal Data: Data related to an individual's race, ethnicity, political opinions, philosophical beliefs, religion, sect, or other beliefs, clothing, membership in associations, foundations, or unions, health, sexual life, criminal convictions, security measures, as well as biometric and genetic data.

Data Processor: A natural or legal person who processes personal data on behalf of the data controller, based on the authority granted by the data controller.

Data Controller: A 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.

Electronic Environment: Environments where personal data can be created, read, altered, and written using electronic devices.

Non-Electronic Environment: All written, printed, visual, and other environments that are not electronic.

3.2. Abbreviations

Board: Personal Data Protection Board.

Authority: Personal Data Protection Authority

Law/PDP Law: Law No. 6698 on the Protection of Personal Data.

VERBIS/Register: The Data Controllers' Registry Information System maintained by the Personal Data Protection Authority.



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4. Related Documents

FR.215 Personal Data Breach Management Policy
FR.216 Personal Data Retention and Disposal Policy
FR.217 Policy on the Processing and Protection of Special Categories of Personal Data
FR.210 Data Subject Application Policy

5. Related Forms

FR.209 Data Subject Application Form

6. Responsibilities

All Personnel

- To act in accordance with all the rules specified in this document.

7. Policy

7.1. General Principles for the Processing of Personal Data

The Company adheres to the mandatory "General Principles" outlined in Article 4 of the PDP Law when processing personal data:

➤ **Compliance with Legal and Ethical Standards:**

The Company manages personal data processing activities in accordance with legal norms, universal legal principles, and ethical standards. It ensures transparency by providing relevant individuals with necessary information. The Company also takes into account the interests and reasonable expectations of individuals, preventing any unexpected or unnecessary outcomes in the data processing process.

➤ **Ensuring Accuracy and Currency of Personal Data:**

Personal data is processed based on the information provided by the data subject, which is assumed to be accurate as declared. The Company takes reasonable care to ensure that personal data within its organization is accurate, up-to-date, and free from errors. If any changes to the data are communicated by the data subject, the Company establishes the necessary administrative and technical mechanisms to update the data in its systems.

➤ **Processing for Specific, Legitimate, and Clear Purposes:**

The Company clearly defines the legitimate and lawful purposes for processing personal data before starting any processing activities. Personal data is processed only as necessary for the Company's products and services and in relation to those specific purposes.

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➤ Relevant, Limited, and Proportional Processing:

Personal data is processed in a manner that is relevant, limited, and proportional to the purposes for which it was collected. The Company ensures that the data processing is directly aligned with the intended purpose and that the data collected is no more than what is required to achieve that purpose.

➤ Retention for the Legally Required Period or as Necessary for the Processing Purpose:

The Company retains personal data only for the period required by relevant laws or for the duration needed to fulfill the purpose of processing. Once the retention period expires or the purpose for processing no longer applies, the Company will delete, destroy, or anonymize the data. As the Data Controller, the Company complies with the retention periods, destruction cycles, and technical and administrative measures set forth in the FR.216 Personal Data Retention and Destruction Policy to ensure the proper handling of personal data.

These principles apply regardless of whether the personal data is processed based on explicit consent or other lawful grounds. In this context, the Company ensures that personal data is processed in accordance with data processing grounds and general principles while fulfilling its obligation to inform individuals.

7.2. Information on Personal Data Processing

The Company has defined and regularly updates the categories of personal data it processes, the groups of individuals whose data is being processed, the purposes of processing personal data, the legal grounds for processing, the channels through which personal data is collected, the recipient groups to whom the data is transferred, the retention periods for personal data that has expired, and the destruction processes. In addition, the Company has taken necessary security measures to ensure the protection of personal data throughout these processes. All of this information is summarized and updated periodically and published publicly on the institution's website, within the VERBİS (verbis.kvkk.gov.tr) registry information system, and updated on the platform.

7.2.1. Categories of Personal Data

In order to comply with legal regulations and to properly manage personal data processing and protection processes, the Company has categorized the personal data it processes.

All personal data categories are generally divided into two main categories: "Personal Data" and "Special Categories of Personal Data."

The categories and definitions of all personal data processed within the Company are as follows:



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CATEGORIES OF PERSONAL DATA	DEFINITION
Identity Data	Name and surname, mother's and father's name, maiden name, date of birth, place of birth, marital status, ID card number, T.C. identity number, signature, etc.
Contact Data	Address, email address, contact address, registered email address (KEP), phone number, etc.
Legal Transaction Data	Information in correspondence with judicial authorities, data in legal case files, etc.
Customer Transaction Data	Call center records, invoices, promissory notes, checks, payment receipts, order information, request details, etc.
Transaction Security Data	IP address information, website login/logout data, passwords, etc.
Financial Data	Bank account details, IBAN, balance sheet information, financial performance data, credit and risk data, asset information, etc.
Professional Experience Data	Diploma information, attended courses, professional training data, certificates, transcript information, etc.
Visual and Auditory Records	Photos, videos, visual and auditory recordings, etc.
Other	Social media usernames, etc.

7.2.2. Groups of Individuals Whose Personal Data is Processed

The groups of individuals whose personal data is processed within our Company and their definitions are publicly disclosed and published on the institution's website at the VERBİS (verbis.kvkk.gov.tr) address.

7.2.3. Purposes of Personal Data Processing

The Company processes personal data in accordance with the "General Principles for Processing Personal Data" outlined in Article 4 of the Law, and based on at least one of the legal grounds specified in Articles 5 and 6 of the Law. Personal data is processed in a manner that is both limited and appropriate, ensuring compliance with these legal requirements. As required by Article 10 of the Law and secondary regulations, the Company provides separate information to each relevant group regarding the categories and purposes of data processing in the corresponding data protection notices. The purposes for processing personal data are declared in the Data Controllers' Registry Information System (VERBİS) and are publicly available on the system (verbis.kvkk.gov.tr).

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7.2.4. Conditions for Processing Personal Data

The Company processes personal data either with the explicit consent of the individual concerned or based on one or more of the other legal grounds for processing. If the personal data being processed is classified as special category data, the conditions outlined in the section "Processing Special Category Personal Data" of this Policy, as well as the Company's Policy on the Processing and Protection of Special Category Personal Data, apply.

✓ **Explicit Consent of the Individual**

When the data subject freely gives explicit consent for a specific purpose, this condition applies. The consent obtained from the data subject is retained by the Company in a manner that is verifiable, in accordance with the relevant data protection regulations, for the required period. If any of the following conditions for processing personal data are met, personal data may be processed without the data subject's explicit consent.

✓ **Explicit Provision in Law**

If there is an explicit legal provision allowing the processing of personal data, this condition applies. Examples include:

- Social Insurance and General Health Insurance Law (No. 5510)
- Inheritance and Transfer Tax Law (No. 7338)
- Labor Law (No. 4857)
- Occupational Health and Safety Law (No. 6331)
- Tax Procedure Law (No. 213)
- Turkish Commercial Code (No. 6102)
- Electronic Commerce Regulation Law (No. 6365)
- Law on Regulating Publications Made on the Internet and Combating Crimes Committed Through These Publications (No. 5651), and other applicable regulations.

✓ **Inability to Obtain Explicit Consent Due to Physical Impossibility**

If it is physically impossible to obtain the explicit consent of the data subject, or if the data subject's consent lacks legal validity, their personal data may be processed under this condition when it is necessary to protect the life or physical integrity of the data subject or another person.

✓ **Direct Relevance to the Establishment or Performance of a Contract**

If the processing of personal data is necessary for the establishment or performance of a contract to which the data subject is a party, such processing may be carried out under this condition.

✓ **Necessity for the Data Controller to Fulfill Legal Obligations**

If the processing of personal data is essential for the data controller to fulfill its legal obligations, such processing is carried out under this condition.



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✓ **Public Disclosure of Personal Data by the Data Subject**

Personal data that has been publicly disclosed by the data subject may only be processed for purposes consistent with the disclosure.

✓ **Necessity of Processing for the Establishment, Exercise, or Protection of a Right**

If the processing of personal data is necessary for the establishment, exercise, or protection of a legal right, the data subject’s personal data is processed under this condition.

✓ **Necessity of Processing for the Legitimate Interests of the Data Controller**

Provided that it does not infringe upon the fundamental rights and freedoms of the data subject, personal data may be processed under this condition if it is necessary for the legitimate interests of the Company.

7.2.5. Conditions for Processing Special Categories of Personal Data

The Company processes special categories of personal data in compliance with the additional measures announced by the Personal Data Protection Board, by adopting all necessary administrative and technical safeguards, and under the following conditions:

- ✓ The explicit consent of the data subject is obtained.
- ✓ The processing of special categories of personal data, excluding those related to health and sexual life, is explicitly provided for by law.
- ✓ Data related to health and sexual life is processed by individuals or organizations under an obligation of confidentiality, solely for purposes such as safeguarding public health, preventive medicine, medical diagnosis, the execution of treatment and care services, or the planning and management of healthcare services and their financing.

The Company has established and published a detailed policy titled “**FR.217 Policy on the Processing and Protection of Special Categories of Personal Data**” to govern the processing of such data.

7.2.6. Channels for Collecting Personal Data

The Company collects personal data in compliance with applicable legal regulations and the purposes outlined in this Policy, based on lawful processing conditions, through both physical and electronic means. The channels and environments used for collecting personal data are as follows:

PHYSICAL DATA COLLECTION	ELECTRONIC DATA COLLECTION
Physical Mail	E-mail
Printed Forms	Web Site
	Software and Applications Used
	IT-Related Devices

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These channels may evolve due to advancements in business processes, changes, or technological developments. In line with the principle of transparency, such changes will be reflected in updates to this Policy.

7.2.7. Transfer of Personal Data

The Company transfers personal data and special categories of personal data to third parties in accordance with Articles 8 and 9 of the Law, based on lawful purposes for processing personal data, while taking all necessary administrative and technical measures.

➤ Domestic Transfers

The Company conducts data transfer activities in compliance with legal requirements. Personal data is transferred to third parties only to the extent required by the service. The Company ensures that "Data Processors" or "Transfer Recipients" are properly instructed regarding data security through data transfer agreements.

RECIPIENT GROUPS	EXAMPLES OF TRANSFER PURPOSES
Authorized Public Institutions	Transferred to authorized public institutions to fulfill legal obligations.
Natural Persons or Private Entities	Transferred to ensure the follow-up and execution of legal proceedings and compliance with legal regulations.
Suppliers (Product/Service Providers)	Transferred for procurement of products/services, ensuring business continuity, and the establishment or performance of contracts.
Affiliates and Subsidiaries	Transferred for compliance with regulations and to maintain communication.
Banks	Transferred for the execution of financial and accounting processes.
Public Access	Shared for the execution of organizational and event management processes.

➤ International Transfer

The Company may transfer personal data abroad only in compliance with the provisions stipulated in Article 9 of the Personal Data Protection Law (PDPL) and by taking the necessary administrative and technical measures. This transfer is possible under one of the following conditions:

- To foreign countries declared by the Authority as having adequate protection, or
- In the absence of adequate protection, provided that the data controllers in Turkey and the relevant foreign country undertake adequate protection in writing and obtain the Board's approval, without requiring the explicit consent of the data subject, or

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- If neither of the two conditions above is fulfilled, personal data may only be transferred abroad with the explicit consent of the data subject.

Examples of recipient groups and purposes of sharing personal data are as follows:

RECIPIENT GROUPS	EXAMPLES OF TRANSFER PURPOSES
Suppliers Located Abroad (Product/Service Providers)	Transferred for the purpose of ensuring the provision of products/services and infrastructure usage.

The recipient groups to which personal data is transferred and the categories of personal data transferred abroad may vary. These changes and updates are publicly notified and published on the institution's website at VERBİS (verbis.kvkk.gov.tr).

7.2.8. Storage and Destruction of Personal Data

As the Data Controller, the Company has determined the storage periods, destruction periods, and the technical and administrative measures to be applied in the storage of personal data in the "FR.216 Personal Data Storage and Destruction Policy." The Company has separately disclosed these periods for each category of personal data in VERBİS. The Company is aware of its responsibility to ensure the data is stored in compliance with these principles.

In accordance with the Personal Data Protection Law, personal data is stored for the period specified in the relevant legislation or for as long as necessary for the purpose it was processed. These periods have been established, and after the expiration of this period, the personal data is deleted, destroyed, or anonymized at the end of the periodic destruction periods specified in the "Regulation on the Deletion, Destruction, or Anonymization of Personal Data" in line with the FR.216 Personal Data Storage and Destruction Policy. You can request further information through the contact details provided in this Personal Data Protection Policy.

7.3. Security Measures for Personal Data

The Company takes technical and administrative measures to ensure the lawful processing of personal data, considering technological capabilities and the cost of implementation. The technical and administrative measures taken to protect personal data are carefully applied and enhanced in compliance with the Company's "**FR.217 Policy on the Processing and Protection of Special Categories of Personal Data**" for special categories of personal data. Periodic high-level audits are conducted within the Company to ensure compliance, and the security measures are also specified in VERBİS.

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The Company takes all appropriate security measures to ensure that personal data is processed only for the specified purposes and to minimize risks such as malicious use, unauthorized access, transmission, destruction, or alteration of personal data.

The personal data processed by the Company is confidential, and the Company ensures compliance with this confidentiality. Personal data can only be accessed by persons authorized by the Company. To this end, the Company ensures that software complies with standards, third parties are carefully selected, and that the "**FR.218 Data Protection Policy**" is adhered to within the Company.

Despite taking the necessary data security measures, in the event that personal data is compromised due to attacks on the Company-operated platforms or systems, or unauthorized third parties gain access to the data, the Company will immediately take action to address the breach and minimize any damage to the individual. The Company will immediately notify the affected individuals and the relevant authorities and take necessary precautions. The rules and procedures regarding personal data breaches are outlined in the "**FR.215 Personal Data Breach Management Policy**."

7.4. Obligation of Clarification

In accordance with Article 10 of the Personal Data Protection Law (PDP Law) and the provisions of the "Regulation on Procedures and Principles for Fulfilling the Obligation to Clarify," the Company informs the Data Subjects through relevant clarification texts about the identity of the data controller and its representative (if any), the methods by which their personal data is collected, the legal basis and purposes of the processing, to whom the personal data is transferred, and the rights they have regarding the processing of their personal data.

7.5. Rights of Data Subjects

According to the Constitution of the Republic of Turkey, every individual has the right to request the protection of their personal data. In this context, the rights of the Data Subject regarding their personal data are outlined in Article 11 of the PDP Law as follows:

- Learn whether their personal data is being processed,
- Request information about their personal data if it has been processed,
- Learn the purpose of processing their personal data and whether it is used in compliance with its purpose,
- Know the third parties to whom their personal data is transferred, either within the country or abroad,
- Request correction of personal data if it is incomplete or incorrect,
- Request deletion or destruction of their personal data in accordance with the conditions set forth in Article 7 of the PDP Law,
- Request notification of the correction, deletion, or destruction of their personal data to third parties to whom it has been transferred,

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- Object to a decision made solely based on automated processing of personal data, which has an adverse effect on them,
- Request compensation for damages incurred due to unlawful processing of their personal data.

The Data Subject may submit requests regarding the above rights to the Company's registered electronic mail (KEP) address, kalearge@hs01.kep.tr, in person, via registered mail with return receipt, or through the Company's registered contact address on the system via the e-mail kvkk@kalejetengines.com The Data Subject must use the "**Data Subject (Data Owner) Application Form**" available on the Company's website for the application. The application must include: The application must include:

- Full name, and signature if the application is made in writing,
- Turkish Republic identification number for Turkish citizens, or nationality, passport number, or, if applicable, identification number for foreign nationals,
- Residential or workplace address for notification purposes,
- If available, an email address, telephone number, and fax number for notification purposes,
- The subject of the request and
- Any relevant information and documents related to the request.

Applications will only be evaluated if made in Turkish. To allow third parties to apply on behalf of the Data Subject, a special power of attorney issued by notary must be provided.

If the Data Subject submits their request in accordance with the procedures outlined in this PDP Policy and in compliance with the "Regulation on Procedures and Principles for Applying to the Data Controller," the Company will respond to the request in the shortest time possible and at the latest within 30 (thirty) days from the application date, free of charge. However, if the process requires an additional cost, the Company may charge a fee as determined by the Authority's tariff.

For written applications, the date of delivery to the data controller or its representative is considered the application date. For other methods, the date the application reaches the data controller is considered the application date.

7.6. Our Contact Information

If you have any questions regarding this PDP Policy or our approach to processing and protecting your personal data, or if you would like to exercise any of the rights mentioned in the PDP Law, you can obtain information through any of the following channels:

KALE JET MOTORLARI SANAYİ A.Ş.

Address: Sanayi Mahallesi Teknopark Bulvarı 10/C İç Kapı No: 139 Pendik / İstanbul

E-mail: kvkk@kalejetengines.com

KEP Address: kalearge@hs01.kep.tr