



**OPET PETROLCÜLÜK A.Ş.**

**FRAMEWORK POLICY ON  
CONFIDENTIALITY AND THE  
PROCESSING AND PROTECTION OF  
PERSONAL DATA**

# Table of Contents

1.	Introduction.....	3
1.1.	Introduction .....	3
1.2.	Scope .....	3
1.3.	Implementation of the Policy and the Relevant Legislation.....	3
1.4.	Execution of the Policy.....	3
2.	Definitions .....	3
3.	Matters Relating to the Processing of Personal Data.....	4
3.1.	Processing Personal Data in Accordance with the Principles Envisaged in the Legislation.....	4
3.1.1.	Processing in Accordance with Lawfulness and Fairness .....	4
3.1.2.	Ensuring Personal Data to Be Accurate and Kept Up to Date Where Necessary .....	4
3.1.3.	Processing for Specified, Explicit and Legitimate Purposes.....	4
3.1.4.	Processing to be Relevant, Limited and Proportionate to the Purposes for which They are Processed .....	5
3.1.5.	Retention for the Duration Envisaged in the Relevant Legislation or Required for the Purpose for which they are Processed.....	5
3.2.	Personal Data Processing Conditions .....	5
3.2.1.	Based on the Explicit Consent of Data Subject.....	5
3.2.2.	It is Expressly Provided for by the Laws.....	5
3.2.3.	Failure to Obtain the Explicit Consent of the Data Subject Due to Actual Impossibility.....	5
3.2.4.	It is Directly Related to The Establishment or Performance of The Contract.....	5
3.2.5.	Fulfillment of Legal Obligations of the Company .....	5
3.2.6.	Making Personal Data Public by the Data Subject.....	6
3.2.7.	Processing of Data is Necessary for Establishment or Protection of Any Right.....	6
3.2.8.	Processing Of Data is Necessary for The Legitimate Interest of Our Company.....	6
3.3.	Processing of Special Categories of Personal Data .....	6
3.4.	Informing the Data Subjects .....	6
3.5.	Transfer of Personal Data .....	6
3.5.1.	Transfer of the Personal Data to Domestic Third Parties.....	7
3.5.2.	Transfer of Personal Data Third Parties Residing Abroad.....	7
3.5.3.	Domestic transfer of the Special Categories of Personal Data.....	9
3.5.4.	Transfer of Special Categories of Personal Data to Third Parties Residing Abroad.....	10
4.	Matters Relating to the Protection of Personal Data .....	12
4.1.	Ensuring the Security of Personal Data.....	12
4.2.	Protection of Special Categories of Personal Data.....	13
4.3.	Increasing and Auditing the Awareness of Business Units Regarding the Protection and Processing of Personal Data .....	13
5.	Categorization of Personal Data Processed by Our Company and Purposes of Processing .....	13

6. Retention and Disposal of Personal Data .....	14
7. Rights of Data Subjects and Exercise of Their Rights .....	14
7.1. Rights of the Data Subject .....	14
7.2. Exercise of the Data Subjects' Rights .....	14
7.3. Our Companies' Response to the Requests .....	14
8. Confidentiality Obligation and Restriction of Access to Information.....	15
8.1. Confidentiality Obligation.....	15
8.2. Need-to-Know Principle.....	15
8.3. Access Controls .....	15
8.4. Notification of Confidentiality Breaches.....	16
9. Authorities and Responsibilities .....	16
10. Revision History .....	16

# 1. Introduction

## 1.1. Introduction

As Opet Petrolcülük A.Ş. (“**Opet**” or the “**Company**”), one of our highest priorities within the scope of our business activities is the protection of personal data. Within the framework of this Confidentiality and Personal Data Protection and Processing Policy (“**Policy**”), which forms an integral part of the Opet Code of Ethics<sup>1</sup>, the principles adopted in the conduct of personal data processing activities carried out by our Company and the fundamental principles adopted to ensure compliance of our data processing activities with the regulations set forth under the Personal Data Protection Law No. 6698 (“**Law**”) are explained. Furthermore, detailed information regarding all personal data processing activities carried out by our Company is provided, thereby informing the relevant data subjects and ensuring the necessary transparency. With full awareness of our responsibilities in this regard, your personal data is processed and protected within the scope of this Policy.

The activities carried out by our Company regarding the protection of our employees’ personal data are governed under the Opet Petrolcülük A.Ş. Employees Personal Data Protection and Processing Policy, which has been drafted in parallel with the principles set forth in this Policy.

## 1.2. Scope

This Policy applies to all personal data of individuals other than our Company’s employees that are processed by the Company through automated means or, provided that they form part of any data recording system, through non-automated means.

## 1.3. Implementation of the Policy and the Relevant Legislation

With regard to the processing and protection of personal data, the relevant applicable legal regulations in force shall primarily apply. In the event of any inconsistency between the applicable legislation and this Policy, our Company acknowledges that the applicable legislation shall prevail. The Policy regulates and concretizes the rules set forth by the relevant legislation within the scope of the Company’s practices.

## 1.4. Execution of the Policy

In the event that the Policy in its entirety or specific provisions thereof are revised, the effective date of the Policy shall be updated accordingly. The Policy is published on our Company’s website and is made available to the relevant data subjects upon their request.

# 2. Definitions

“**Explicit Consent**” Consent given freely, based on information, and relating to a specific subject matter.

“**Anonymization**” The process of rendering personal data impossible to associate with an identified or identifiable natural person under any circumstances, even when matched with other data.

“**Data Subject**” The natural person whose personal data are processed (e.g. customers, visitors, employees, employee candidates, etc.).

“**Business Partners**” Suppliers, retailers, authorized service providers, and all kinds of representatives, subcontractors and consultants acting in the name and on behalf of the Company.

“**Law**” The Personal Data Protection Law No. 6698.

“**Personal Data**” Any information relating to an identified or identifiable natural person.

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<sup>1</sup> Please refer to Opet Code of Ethics for further details.

**“Processing of Personal Data”** Any operation performed upon personal data, whether wholly or partly by automatic means or, provided that they form part of any data recording system, by non-automatic means, such as collection, recording, storage, preservation, alteration, reorganization, disclosure, transfer, acquisition, making available, classification, or prevention of use.

**“Confidential Information”** means any non-public information relating to Opet’s business activities, organization, business processes, information systems, security practices, commercial strategies, contracts, financial and corporate information, as well as customer/supplier relationships, including Opet’s and/or the data subjects’ personal data.

**“Confidentiality”** means the entirety of obligations concerning the access to, use, disclosure, and protection of Confidential Information and personal data by authorized persons, strictly limited to the purpose of processing and in accordance with the “need-to-know” principle, within the framework of the applicable legislation and the principles and rules set forth in this Policy.

**“Legislation”** All legislation in force in Türkiye and in relevant countries concerning the protection of personal data, primarily including the Personal Data Protection Law No. 6698.

**“Special Categories of Personal Data”** Data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data, constitute special categories of personal data.

**“VERBIS”** The Data Controllers’ Registry Information System.

**“Data Processor”** The 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”** The natural or legal person who determines the purposes and means of the processing of personal data and is responsible for the establishment and management of the data recording system.

### **3. Matters Relating to the Processing of Personal Data**

#### **3.1. Processing Personal Data in Accordance with the Principles Envisaged in the Legislation**

Opet conducts all personal data processing activities in accordance with the general principles detailed below.

##### **3.1.1. Processing in Accordance with Lawfulness and Fairness**

Personal data is 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.

##### **3.1.2. Ensuring Personal Data to Be Accurate and Kept Up to Date Where Necessary**

Our Company takes the necessary measures to ensure that personal data is accurate and up-to-date throughout the period of processing and establishes the necessary mechanisms to ensure the accuracy and up-to-dateness of personal data for certain periods.

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

Our Company expressly sets forth the purposes of processing personal data and processes them within the scope of purposes related to these activities in line with its business activities.

### **3.1.4. Processing to be Relevant, Limited and Proportionate to the Purposes for which They are Processed**

Our Company collects personal data only in the quality and to the extent required by its business activities and they are processed limited to the specified purposes.

### **3.1.5. Retention for the Duration Envisaged in the Relevant Legislation or Required for the Purpose for which they are Processed**

Our Company retains personal data for the period required for the purpose for which they are processed and for the minimum period envisaged in the relevant legislation. In this context, our Company first determines whether a period of time is envisaged for the retention of personal data in the relevant legislation, and if a duration is determined, it acts in accordance with this duration. If there is no legal period, personal data is retained for the duration required for the purpose for which they are processed. Personal data are disposed of at the end of the specified retention periods in accordance with the periodic disposal periods or in accordance with the application of the data subject and with the specified disposal methods (deletion and/or destruction and/or anonymization).

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

Except for the explicit consent of the data subject, the basis of the personal data processing activity may be one of the conditions stated below and more than one condition may be the basis of the same personal data processing activity. In case the processed data is one of the special categories of personal data, the conditions in the part 3.3 (“Processing of Special Categories of Personal Data”) of this Policy shall be applied.

### **3.2.1. Based on the Explicit Consent of Data Subject**

One of the conditions for the processing of personal data is the explicit consent of the data subject. The explicit consent of the data subject should be disclosed on a specific subject, based on information and free will.

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

### **3.2.2. It is Expressly Provided for by the Laws**

If the personal data of the data subject is expressly stipulated in the law, in other words, if there is a clear provision in the relevant law regarding the processing of personal data, it may be subject to this data processing condition.

### **3.2.3. Failure to Obtain the Explicit Consent of the Data Subject Due to Actual Impossibility**

Personal data of data subject may be processed in case it is necessary for the protection of life or physical integrity of the person itself or of any other person, who is unable to explain its consent due to the physical disability or whose consent is not deemed legally valid.

### **3.2.4. It is Directly Related to The Establishment or Performance of The Contract**

This condition may be deemed to be fulfilled if the processing of personal data is necessary provided that it is directly related to the establishment or performance of a contract to which the data subject is a party.

### **3.2.5. Fulfillment of Legal Obligations of the Company**

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

### **3.2.6. Making Personal Data Public by the Data Subject**

If the data subject has made its personal data public, the relevant personal data may be processed limitedly for the purpose of making it public.

### **3.2.7. Processing of Data is Necessary for Establishment or Protection of Any Right**

Personal data of data subject may be processed in case processing of data is necessary for establishment or protection of any right.

### **3.2.8. Processing Of Data is Necessary for The Legitimate Interest of Our Company**

Personal data of data subject may be processed in case processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.

### **3.3. Processing of Special Categories of Personal Data**

In the processing of personal data classified as “special categories” under the Law, the Company acts in strict compliance with the regulations set forth in the Law.

Pursuant to Article 6 of the Law, certain categories of personal data which may lead to victimization or discrimination if processed unlawfully are defined as “special categories.” Such data includes data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data.

In accordance with the Law, special categories of personal data are processed by the Company provided that adequate measures determined by the Personal Data Protection Board (“**Board**”) are taken, and where one of the following legal grounds exists: the explicit consent of the data subject; explicit provision by laws; the inability to obtain the data subject’s explicit consent due to factual impossibility; the data subject having made their special categories of personal data public; the necessity of data processing for the establishment, exercise or protection of a right; the necessity of processing by persons or authorized institutions and organizations under an obligation of confidentiality within the scope of their duties; the necessity of processing for the fulfillment of legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance; or processing by foundations, associations and other non-profit organizations or entities established for political, philosophical, religious or trade union purposes, provided that such processing relates to their members or individuals in regular contact with them.

### **3.4. Informing the Data Subjects**

In accordance with Article 10 of the Law and the secondary legislation, our Company informs data subjects about by whom, for which purposes and as the data controller their personal data are processed; to whom and for which purposes such data are transferred; the methods and legal grounds for the collection of personal data; and the rights of the data subjects within the scope of the processing of their personal data.

### **3.5. Transfer of Personal Data**

In line with lawful personal data processing purposes, our Company may transfer the personal data and special categories of personal data of the data subject to third parties (including third-party companies,

group companies and third-party natural persons) by taking the necessary security measures. In this respect, our Company acts in compliance with the provisions set forth under Articles 8 and 9 of the Law.

In cases where the transfer of personal data to third parties is required, our Company limits such transfer to what is relevant and necessary for the purpose; contractually secures the obligations relating to confidentiality and information security with the receiving parties; and observes the confidentiality and access principles set forth in Section 8 of this Policy in transfer processes.

### **3.5.1. Transfer of the Personal Data to Domestic Third Parties**

Even in the absence of the data subject's consent, personal data may be transferred to third parties by our Company, provided that one or more of the data processing conditions ("**Data Processing Conditions**") set forth below are met, and that due care is exercised and all necessary security measures, including the methods prescribed by the Board, are taken.

- The relevant activities relating to the transfer of personal data are explicitly stipulated by law;
- The transfer of personal data by the Company is directly related to and necessary for the establishment or performance of a contract;
- The transfer of personal data by the Company is mandatory for the fulfillment of its legal obligations;
- Provided that the personal data have been made public by the data subject, the transfer by our Company is limited to the purpose of such disclosure;
- The transfer of personal data by the Company is mandatory for the establishment, exercise or protection of the rights of the Company, the data subject or third parties;
- Provided that it does not harm the fundamental rights and freedoms of the data subject, the transfer of personal data is mandatory for the legitimate interests of the Company;
- The transfer of personal data is mandatory for the protection of the life or physical integrity of the data subject or another person where the data subject is unable to express consent due to factual impossibility or where the consent is not legally valid.

### **3.5.2. Transfer of Personal Data Third Parties Residing Abroad**

The Company may transfer the personal data and special categories of personal data of the data subject to third parties by taking the necessary security measures in line with lawful personal data processing purposes.

Personal data may be transferred by the Company to foreign countries that are declared by the Board to provide an adequate level of protection, or, in the absence of adequate protection, to foreign countries where one of the following exists and the transfer is permitted by the Board: the existence of a non-international agreement between public institutions and organizations or international organizations abroad and public institutions and organizations or professional organizations having the status of public institutions in Türkiye; the existence of binding corporate rules containing provisions on the protection of personal data, which are required to be complied with by companies within a group of undertakings engaged in joint economic activity and approved by the Board; the existence of a standard contract announced by the Board, which includes matters such as data categories, purposes of data transfer, recipients and recipient groups, technical and administrative measures to be taken by the data recipient, and additional measures taken for special categories of personal data; or the existence of a written undertaking containing provisions ensuring an adequate level of protection and the permission of the Board for the transfer. In this respect, the Company acts in compliance with the provisions set forth under Article 9 of the Law.

The transfer of personal data abroad by our Company shall be carried out in accordance with Article 9 of the Law and the principles set forth in this Policy, by taking technical and administrative measures, and in line with the framework explained below.

**(i) Based on the Adequacy Decision Made About the Relevant Country, International Organization or Sectors within the Country**

Personal data may be transferred abroad by the Company if one of the conditions specified in Articles 5 and 6 of the Law exists and there is an adequacy decision issued by the Board regarding the country, international organization or sectors within the country to which the transfer will be made.

The adequacy decision is issued by the Board and published in the Official Gazette. The Board may also seek the opinion of relevant institutions and organizations if necessary. The adequacy decision is evaluated every four years at the latest. The Board may modify, suspend or revoke the adequacy decision with prospective effect as a result of the assessment or as otherwise deemed necessary.

**(ii) Transfer Based on Appropriate Safeguards**

In the absence of an adequacy decision, personal data may be transferred abroad by the Company if one of the following appropriate safeguards is provided by the parties, provided that one of the personal data processing conditions specified in Articles 5 and 6 of the Law exists and the data subject has the opportunity to exercise his/her rights and apply for effective legal remedies in the country where the transfer will be made:

- **Special Transfer Reason for Public Institutions and Organizations or Professional Organizations of Public Nature:** Existence of an agreement that is not in the nature of an international agreement between public institutions and organizations or international organizations abroad and public institutions and organizations or professional organizations in the nature of a public institution in Türkiye and the Board's authorization of the transfer.
- **Binding Corporate Rules:** Existence of binding corporate rules approved by the Board and containing provisions on the protection of personal data, which companies within the group of undertakings engaged in joint economic activities are obliged to comply with.
- **Standard Contracts:** Existence of a standard contract announced by the Board, including data categories, purposes of data transfer, recipients and recipient groups, technical and administrative measures to be taken by the data importer, additional measures taken for special categories of personal data, and notifying the Board about this standard contract within the legal periods.
- **Undertaking:** Existence of a written undertaking containing provisions to ensure adequate protection and authorization of the transfer by the Board.

**(iii) Transfer Based on Derogations**

Personal data may be transferred abroad by the Company in the absence of an adequacy decision and if one of the appropriate safeguards cannot be provided, provided that it is incidental, in the presence of one of the following situations:

- **Informed Special Explicit Consent for Possible Risks:** The explicit consent of the data subject to the transfer, provided that the data subject is informed about the possible risks.
- **Execution of the Contract and Implementation of Pre-Contractual Measures:** The transfer is necessary for the performance of a contract between the data subject and the controller or for the implementation of pre-contractual measures taken upon the request of the data subject.

- **Third Party Contracts for the Benefit of the Data Subject:** The transfer is necessary for the conclusion or performance of a contract between the controller and another natural or legal person for the benefit of the data subject.
- **Necessity for Important Reasons of Public Interest:** The transfer is necessary for an important reason of public interest.
- **Establishment, Exercise or Protection of a Right:** The transfer of personal data is mandatory for the establishment, exercise or protection of a right.
- **Vital Interest:** The transfer of personal data is mandatory for the protection of the life or physical integrity of the person or another person who is unable to disclose his consent due to actual impossibility or whose consent is not legally valid.
- **Transfer from Public Registers:** Transfer from a registry open to the public or persons with legitimate interests, provided that the conditions required to access the registry in the relevant legislation are met and the person with a legitimate interest requests it.

### **3.5.3. Domestic transfer of the Special Categories of Personal Data**

By exercising due care, taking the necessary security measures and implementing the adequate measures prescribed by the Board, the Company may transfer personal data in line with legitimate and lawful personal data processing purposes, provided that one or more of the data processing conditions set forth under Article 6 of the Law exist.

#### **(i) Explicit Consent of the Data Subject**

One of the conditions for processing special categories of personal data is the explicit consent of the data subject. The explicit consent of the data subject must be related to a specific subject, based on information and freely given.

In the presence of the following special categories of personal data processing conditions, personal data may be processed without the explicit consent of the data subject:

#### **(ii) Explicitly Stipulated by Laws**

If the special categories of personal data of the data subject are explicitly stipulated in the law, in other words, if there is a clear provision in the relevant law regarding the processing of special categories of personal data, this data processing condition may be mentioned.

#### **(iii) Failure to Obtain Explicit Consent of the Data Subject Due to Physical Disability**

The personal data of the data subject may be processed if it is mandatory to process the personal data of the data subject in order to protect the life or physical integrity of the data subject or another person who is unable to disclose his/her consent due to actual impossibility or whose consent cannot be recognized as valid.

#### **(iv) Publicization of Special Categories of Personal Data of the Data Subject**

In the event that the data subject has made his/her special categories of personal data public in accordance with his/her own will to make it public, the relevant special categories of personal data may be processed limited to the purpose of making it public.

#### **(v) Data Processing is Mandatory for the Establishment or Protection of a Right**

If data processing is mandatory for the establishment, exercise or protection of a right, the special categories of personal data of the data subject may be processed.

**(vi) Processing is Necessary within the Scope of Relevant Purposes by Persons Under Secrecy Obligation or Authorized Institutions and Organizations**

Special categories of personal data of the data subject may be processed by persons under the obligation of confidentiality or authorized institutions and organizations, if necessary for the protection of public health, preventive medicine, medical diagnosis, treatment and care services, and the planning, management and financing of health services.

**(vii) Processing for the Fulfillment of Legal Obligations Regarding Employment, Occupational Health and Safety, Social Security, Social Services and Social Assistance**

In the event that it is mandatory to fulfill legal obligations in the fields of employment, occupational health and safety, social security, social services and social assistance, the special categories of personal data of the data subject may be processed.

**(viii) Processing Regarding Foundations, Associations and Other Non-Profit Organizations or Entities Established for Political, Philosophical, Religious or Trade Union Purposes**

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 to which they are subject and their purposes, are limited to their fields of activity and are not disclosed to third parties; may process special categories of personal data of the data subject for their current or former members and members or persons who are in regular contact with these organizations and formations.

**3.5.4. Transfer of Special Categories of Personal Data to Third Parties Residing Abroad**

The Company may transfer the personal data and special categories of personal data of the data subject to third parties by taking the necessary security measures in line with lawful personal data processing purposes.

Personal data may be transferred by the Company to foreign countries that are declared by the Board to provide an adequate level of protection, or, in the absence of adequate protection, to relevant foreign countries provided that one of the following exists and the transfer is permitted by the Board: the existence of a non-international agreement concluded between public institutions and organizations or international organizations abroad and public institutions and organizations or professional organizations having the status of public institutions in Türkiye; the existence of binding corporate rules containing provisions on the protection of personal data, which are required to be complied with by companies within a group of undertakings engaged in joint economic activity and approved by the Board; the existence of a standard contract announced by the Board, which includes matters such as data categories, purposes of data transfer, recipients and recipient groups, technical and administrative measures to be taken by the data recipient, and additional measures taken for special categories of personal data; or the existence of a written undertaking containing provisions ensuring an adequate level of protection and the permission of the Board for the transfer. In this respect, the Company acts in compliance with the provisions set forth under Article 9 of the Law.

The transfer of personal data abroad by our Company shall be carried out in accordance with Article 9 of the Law and the principles set forth in this Policy, by taking technical and administrative measures, and in line with the framework explained below.

**(i) Based on the Adequacy Decision Made About the Relevant Country, International Organization or Sectors within the Country**

Personal data may be transferred abroad by the Company if one of the conditions specified in Articles 5 and 6 of the Law exists and there is an adequacy decision issued by the Board regarding the country, international organization or sectors within the country to which the transfer will be made.

The adequacy decision is issued by the Board and published in the Official Gazette. The Board may also seek the opinion of relevant institutions and organizations if necessary. The adequacy decision is evaluated every four years at the latest. The Board may modify, suspend or revoke the adequacy decision with prospective effect as a result of the assessment or as otherwise deemed necessary.

**(ii) Transfer Based on Appropriate Safeguards**

In the absence of an adequacy decision, personal data may be transferred abroad by the Company if one of the following appropriate safeguards is provided by the parties, provided that one of the personal data processing conditions specified in Articles 5 and 6 of the Law exists and the data subject has the opportunity to exercise his/her rights and apply for effective legal remedies in the country where the transfer will be made:

- **Special Transfer Reason for Public Institutions and Organizations or Professional Organizations of Public Nature:** Existence of an agreement that is not in the nature of an international agreement between public institutions and organizations or international organizations abroad and public institutions and organizations or professional organizations in the nature of a public institution in Türkiye and the Board's authorization of the transfer.
- **Binding Corporate Rules:** Existence of binding corporate rules approved by the Board and containing provisions on the protection of personal data, which companies within the group of undertakings engaged in joint economic activities are obliged to comply with.
- **Standard Contracts:** Existence of a standard contract announced by the Board, including data categories, purposes of data transfer, recipients and recipient groups, technical and administrative measures to be taken by the data importer, additional measures taken for special categories of personal data, and notifying the Board about this standard contract within the legal periods.
- **Undertaking:** Existence of a written undertaking containing provisions to ensure adequate protection and authorization of the transfer by the Board.

**(iii) Transfer Based on Derogations**

Personal data may be transferred abroad by the Company in the absence of an adequacy decision and if one of the appropriate safeguards cannot be provided, provided that it is incidental, in the presence of one of the following situations:

- **Informed Special Explicit Consent for Possible Risks:** The explicit consent of the data subject to the transfer, provided that the data subject is informed about the possible risks.
- **Execution of the Contract and Implementation of Pre-Contractual Measures:** The transfer is necessary for the performance of a contract between the data subject and the controller or for the implementation of pre-contractual measures taken upon the request of the data subject.
- **Third Party Contracts for the Benefit of the Data Subject:** The transfer is necessary for the conclusion or performance of a contract between the controller and another natural or legal person for the benefit of the data subject.
- **Necessity for Important Reasons of Public Interest:** The transfer is necessary for an important reason of public interest.

- **Establishment, Exercise or Protection of a Right:** The transfer of personal data is mandatory for the establishment, exercise or protection of a right.
- **Vital Interest:** The transfer of personal data is mandatory for the protection of the life or physical integrity of the person or another person who is unable to disclose his consent due to actual impossibility or whose consent is not legally valid.
- **Transfer from Public Registers:** Transfer from a registry open to the public or persons with legitimate interests, provided that the conditions required to access the registry in the relevant legislation are met and the person with a legitimate interest requests it.

## 4. Matters Relating to the Protection of Personal Data

### 4.1. Ensuring the Security of Personal Data

In accordance with Article 12 of the Law, our Company takes the necessary measures, in line with the nature of the personal data, to prevent unlawful processing, access, transfer or other potential security breaches relating to personal data and to ensure their protection. In this context, Opet takes administrative and technical measures aimed at ensuring an adequate level of security, in particular the measures listed below, in compliance with the guidelines published by the Personal Data Protection Board (“**Board**”) and carries out or commissions audits accordingly.

The most up-to-date list of the technical and administrative measures adopted by our Company can be accessed through the Data Controllers’ Registry Information System (VERBIS).

- **Administrative Measures Taken by OPET to Ensure the Lawful Processing of Personal Data and to Prevent Unlawful Access to Personal Data**

- Opet provides training to its employees and raises awareness with regard to the processing and protection of personal data.
- In cases where personal data is subject to be transferred, Opet ensures that provisions are included in the contracts executed with the parties to whom personal data are transferred, stipulating that such parties shall fulfill their obligations to ensure data security.
- Personal data processing activities carried out by Opet are examined in detail, and within this scope, the steps required to ensure compliance with the personal data processing conditions stipulated under the Law are identified.
- Opet identifies the practices required to ensure compliance with the Law and regulates such practices through internal policies.

- **Technical Measures Taken by Our Company to Ensure the Lawful Processing of Personal Data and to Prevent Unlawful Access to Personal Data**

- With regard to the processing and protection of personal data, Opet takes technical measures to the extent permitted by technological capabilities, and such measures are updated and improved in line with developments.
- Specialized personnel are employed for technical matters.
- Regular audits are conducted at periodic intervals to monitor the implementation of the measures taken.
- Software and systems necessary to ensure security are established and utilized.
- Access to personal data processed within our Company is restricted to relevant employees in line with the determined processing purposes.

- In the protection of special categories of personal data, all necessary technical measures are taken, in particular the adequate measures prescribed under the Decision of the Board dated 31/01/2018 and numbered 2018/10.

#### **4.2. Protection of Special Categories of Personal Data**

Sensitive personal data are accorded special importance under the Law due to the risk of causing victimization or discrimination if processed unlawfully. Pursuant to Article 6 of the Law, “special categories of personal data” are defined as data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance and dress, membership of associations, foundations or trade unions, criminal convictions and security measures, as well as biometric and genetic data and data relating to health and sexual life.

The technical and administrative measures taken by our Company for the protection of personal data are implemented, with respect to special categories of personal data, within the scope explained under the Special Categories of Personal Data Management Policy, in line with the adequate measures prescribed under the Decision of the Board dated 31/01/2018 and numbered 2018/10. The activities carried out in this regard are monitored and audited within the framework of audits conducted within our Company. Detailed information regarding the processing of special categories of personal data is provided in Section 3.3 of this Policy.

#### **4.3. Increasing and Auditing the Awareness of Business Units Regarding the Protection and Processing of Personal Data**

In order to increase awareness aimed at preventing the unlawful processing of personal data, preventing unlawful access to such data, and ensuring the protection of personal data, our Company ensures that the necessary trainings are organized for its business units. The trainings and awareness activities organized by the Company are prepared based on the “Personal Data Security Guide” published on the official website of the Board.

Through the trainings and awareness activities conducted, our Company aims to ensure that the personal data processing activities carried out by employees during the performance of their job duties are conducted in compliance with the Law and the secondary legislation.

Our Company establishes the necessary systems to ensure that both its existing employees and newly recruited employees develop awareness regarding the protection of personal data and cooperates with consultants where deemed necessary. In this context, participation in relevant trainings, seminars and information sessions is evaluated by our Company, and new trainings are organized in parallel with updates to the relevant legislation.

### **5. Categorization of Personal Data Processed by Our Company and Purposes of Processing**

Within our Company, personal data are processed in accordance with the general principles set forth under the Law, in particular the principles specified in Article 4 of the Law regarding the processing of personal data, based on and limited to at least one of the Data Processing Conditions, and in line with the purposes of personal data processing arising within the scope of the conduct of our Company’s business activities.

## **6. Retention and Disposal of Personal Data**

Our Company retains personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the legal legislation. Our Company first determines whether a period of time is stipulated for the retention 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 retained for the period required for the purpose for which they are processed.

The personal data processed by our Company are handled on a categorical basis and maximum data retention periods have been determined for each category of personal data. These periods are set out in the table in our Company's Personal Data Retention and Disposal Policy. Personal data are disposed of at the end of the specified maximum retention periods in accordance with the periodic disposal periods or in accordance with the application of the data subject and with the specified disposal methods (deletion and/or destruction and/or anonymization).

## **7. Rights of Data Subjects and Exercise of Their Rights**

### **7.1. Rights of the Data Subject**

The data subjects have the following rights:

- (1) Learn whether personal data is being processed,
- (2) Request information if their personal data has been processed,
- (3) To learn the purpose of processing personal data and whether they are used for their intended purpose,
- (4) To know the third parties to whom personal data are transferred domestically or abroad,
- (5) To request correction of personal data in case of incomplete or incorrect processing and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- (6) Although it has been processed in accordance with the provisions of the Law and other relevant laws, to request the deletion or destruction of personal data in the event that the reasons requiring its processing disappear and to request notification of the transaction made within this scope to third parties to whom personal data is transferred,
- (7) To object to the emergence of a result to the detriment of the person himself/herself by analyzing the processed data exclusively through automated systems,
- (8) In case of damage due to unlawful processing of personal data, to demand compensation for the damage.

### **7.2. Exercise of the Data Subjects' Rights**

Data subjects may submit their requests regarding the rights listed under Section 7.1 ("*Rights of the Data Subject*") to our Company by using the methods determined by the Board. In this respect, they may make use of the "Data Subject Application Form" available at <https://www.opet.com.tr/kisisel-verilerin-korunmasi>.

### **7.3. Our Companies' Response to the Requests**

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

In case the data subject submits its request regarding the rights in part 7.1. (“*Rights of the Data Subject*”) to our Company in accordance with the procedure, our Company will conclude the relevant request free of charge and as soon as possible and within 30 (thirty) days at the latest, depending on the nature of the request. However, if the process requires an additional cost, a fee may be charged in accordance with the tariff determined by the Board.

## **8. Confidentiality Obligation and Restriction of Access to Information**

### **8.1. Confidentiality Obligation**

Our Company considers the protection of all non-public information obtained in the course of its activities as an integral part of its corporate responsibility. In this context, Opet employees, as well as business partners, suppliers, and service providers acting in the name and on behalf of the Company, use the Confidential Information they become aware of during the performance of their duties solely to the extent required by the work and exercise due care to prevent such information from being disclosed to or accessed by unauthorized persons or authorities.

Confidential Information may not be disclosed, reproduced, removed from the Company, or made available to third parties for any purpose other than the designated purpose of use. This obligation is not limited to the period of active engagement and shall continue even after the termination of the relevant person’s relationship with the Company. Our Company implements its practices concerning the protection of Confidential Information in conjunction with the Opet Code of Ethics and the relevant contractual obligations and expects its employees and business partners to act in compliance with these principles.

With respect to personal data that may fall within the scope of Confidential Information, the provisions set forth in this Policy regarding the processing and protection of personal data shall additionally apply, and this Section shall be deemed complementary to such provisions.

### **8.2. Need-to-Know Principle**

Our Company considers the restriction of access as a fundamental control mechanism in the protection of Confidential Information and manages access in line with the “need-to-know” principle. In this context, access authorizations are determined on the basis of job descriptions and areas of responsibility, limited to cases where access is mandatory for the execution of the relevant business process.

The processes regarding the establishment, modification, and revocation of access authorizations are defined; access requests are assessed through appropriate approval mechanisms by linking them to a business justification, and authorizations are duly recorded. Access rights are reviewed periodically and are updated or revoked without delay in the event of organizational changes, changes in duties/roles, or the termination of the relationship with the Company. Accordingly, a controlled access structure is ensured to enable the use of Confidential Information solely by authorized persons and limited to the designated purpose.

### **8.3. Access Controls**

Our Company takes the necessary technical and administrative measures to protect Confidential Information against the risks of unauthorized access, disclosure, alteration, loss, or use for purposes other than the intended purpose; and regularly reviews and improves such measures in line with current

developments and needs. In this context, access to Confidential Information is restricted through authorization mechanisms, access activities are monitored, and the necessary controls are ensured.

Confidential Information is subject to different levels of security based on its nature and degree of sensitivity; stricter access conditions and additional protection measures are applied with respect to information of a higher level of sensitivity. Access to information by third parties providing services on behalf of the Company is limited solely to the scope required by the service, and the access conditions as well as confidentiality and information security obligations are secured through contractual arrangements. Where deemed necessary, our Company may monitor and audit third-party access.

#### **8.4. Notification of Confidentiality Breaches**

In the event that unauthorized access to, disclosure of, loss of, or a similar incident concerning Confidential Information becomes known, the relevant matter shall be reported without delay to the Opet Legal and Compliance Leadership. Our Company evaluates such incidents within the scope of its relevant internal processes, conducts the necessary investigations, and takes appropriate actions. Where the incident qualifies as a personal data breach, the processes relating to data breach management set forth in this Policy shall additionally be implemented.

### **9. Authorities and Responsibilities**

The Opet Legal and Compliance Leadership is the unit responsible for the implementation of this Policy. In the event that any action is identified or suspected to be contrary to this Policy, the applicable Legislation, or the Opet Code of Ethics<sup>2</sup>, the Opet Legal and Compliance Leadership may be contacted.

### **10. Revision History**

This Policy entered into force by the Board of Directors' Resolution dated 15.04.2022 and was updated by the Board of Directors' Resolution dated 06.02.2026. Opet Legal and Compliance Leadership is responsible for updating the Policy.

<b>Revision</b>	<b>Date</b>	<b>Comment</b>
No:1	08.07.2024	The Policy has been updated following the amendments made to the Personal Data Protection Law No. 6698.
No:2	12.05.2026	The Policy has been updated to include confidentiality provisions and in line with the amendments made to the Personal Data Protection Law No. 6698. Unit names have also been updated.

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<sup>2</sup> Please refer to Opet Code of Ethics for further details.