

INTERNAL DIRECTION OF THE PERSONAL DATA PROTECTION COMMITTEE

Vibroser Seramik İnş. San. ve Tic. Ltd. Şti. ("**Vibroser**") Personal Data Protection Committee ("**Committee**") Internal Directive ("**Internal Directive**"), is prepared according to the Personal Data Protection Law No.6698 ("**Law**") published in the Official Gazette dated 07/04/2016 and numbered 29677. To the regulation ("**Regulation**"), on the Deletion, Elimination or Anonymization of Personal Data issued by the Personal Data Protection Authority and published in the Official Gazette dated 28/10/2017 and numbered 30224, and to the Vibroser Personal Data Protection Policy ("**Policy**") and Vibroser Personal Data Retention and Destruction Policy ("**Personal Data Retention and Destruction Policy Policy**").

A Personal Data Protection Committee has been established under the supervision of the data controller Vibroser to carry out the personal data storage and destruction processes and to carry out the necessary work and transactions in accordance with the Law and Regulation. In this context, the necessary internal arrangements are made by Vibroser for the storage and destruction of personal data in accordance with the regulations and policies on the protection of personal data, and the necessary system is established for awareness.

Goal:

Article 1- This Internal Directive has been prepared to determine the issues regarding the Committee's fulfillment of its duties, the principles that it must comply with within the framework of the personal data protection regulations and the Policies and the procedures to be implemented depending on the Policies.

Scope:

Article 2- This Internal Directive covers the relevant responsibilities, works and activities of the Committee and its members.

Basis:

Article 3- This Internal Directive has been prepared based on the above-mentioned regulations on the Protection of Personal Data Law No. 6698.

Vibroser Personal Data Protection Committee:

Article 4- The Committee is appointed by the Board of Directors of Vibroser to fulfill its obligations under the law, to ensure and supervise the implementation of the Policies, and to make suggestions for their functioning. The Board is responsible for ensuring compliance and sustainable efficiency. Within the scope of Vibroser Seramik İnş. San. ve Tic. Ltd. Şti.'s KVK regulations.

The distribution of duties of the committee members, the removal or addition of members from the Committee are carried out by the head of the committee with the authority given by the data controller.

Data Controller Representative:

Article 5 - The Data Controller Representative is elected from the Committee and carries out the relations of Vibroser with the Institution.

Members:

Article 6- Formation of the Committee and the duties of the persons are stated below.

Status	Mission
President	President of the Committee - responsible for governance and communication
Member	Responsible for law compliance and audit and planning-reporting of business processes
Member	Information Technologies - responsible for data security, risk management, policies, and procedures

Article 7- The Committee is responsible for the protection, storage, processing and deletion, destruction, and anonymization of personal data.

In this context, the Committee:

- i. Creates the necessary procedures and ensures that the aforementioned procedure is implemented.
- ii. If there is a change in the legislation regarding personal data, it ensures that intraco work and transactions are carried out in order to comply with the new regulations.
- iii. It prepares an inventory of personal data.
- iv. It periodically updates the inventory of personal data.
- v. It notifies the inventory of personal data to the registry and ensures that it is kept up to date.
- vi. Exchanges correspondence with the registry and keeps the correspondence.

Third parties that process personal data check the agreements to be made with these parties and confirm their compliance within the scope of the regulations. And have third parties inspected.

It determines and authorizes natural and legal persons who process personal data.

Article 8- The Board is obliged to take technical and administrative measures for the protection of all personal data contained in Vibroser, to continuously monitor the developments and administrative activities, to prepare the necessary procedures to announce them within Vibroser, and to ensure compliance with these procedures and to supervise them. Within the scope of the protection of personal data, the Board ensures that audits are carried out by the Board or by someone from outside at certain periods. Regarding the protection of personal data, senior management periodically collects and ensures that both the current situation and risks are discussed. It ensures meeting decisions are signed with wet ink signature and are filed. It informs the units related to the protection of personal data periodically from the portal / by e-mail / with an announcement.

Article 9- The Committee is obliged to fulfill the disclosure requirements in terms of all personal data processing processes and to ensure that explicit consent is obtained and maintained when necessary.

Committee regarding personal data:

- i. It ensures that the identity of the data controller is announced.
- ii. It ensures that the purposes of processing personal data are for specific, legitimate and explicit purposes, and are controlled and is announced to both employees and customers.
- iii. It explains to whom and for what purpose the processed data will be transferred.
- iv. Explains the data collection method and its legal reason.
- v. The Committee determines, enforces, and inspects the ways of obtaining the explicit consent of the person for the processing of personal data.
- vi. In case of recording sensitive personal data, it guarantees obtaining explicit consent.
- vii. If personal data is to be kept in cloud systems or to be stored abroad, it ensures that the explicit consent of the personal data owner is obtained. It makes sure that the foreign country to which personal data will be transferred is announced by the board.

Article 10- In case of transfer of personal data to third parties, it determines whether explicit consent will be obtained from the data owner according to the location / authority status to be shared.

The situations in which explicit consent cannot be obtained are determined below. In any case, it records what data is shared with the following institutions and that third parties that comply with the following status comply with the valid basis:

- i. In case of failure to obtain explicit consent due to actual impossibilities
- ii. When it is about their or someone else's life or bodily integrity
- iii. If it is directly related to the establishment or execution of a contract
- iv. In case it is necessary to process personal data of contract parties
- v. In case data processing is mandatory for the establishment, use or protection of a right
- vi. In case it is mandatory for the data controller to fulfill their legal obligation
- vii. If the person has made their data public
- viii. In case data processing is mandatory for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the person concerned are not violated,
- ix. In case of processing data of the members of non-profit organizations or entities such as political parties, foundations, associations, or unions provided that they are in compliance with the legislation and their purposes, limited to their fields of activity and not disclosed to third parties
- x. In case of processing by persons or authorized institutions and organizations under the obligation of secrecy in order to protect public health, preventive medicine, medical diagnosis, treatment and care services and planning, management and financing of health services.

If personal data will be transferred abroad, if explicit consent is not obtained; In case there is sufficient or insufficient protection where the data will be transferred responsible for adequate protection of data

in the relevant foreign country and Turkey would coordinate the share of case and the board's permission to commit themselves in writing.

The person who shares the data ensures that the place and purpose of sharing this data is made in writing and approved. Whether the consent of the recommendation data is obtained is checked and documented. It also ensures that it is shared after the approval of the law and the data controller.

Article 11- The Committee evaluates the applications of personal data owners and provides coordination within Vibroser to respond to the applications. It ensures the necessary coordination and communication with the Board when necessary.

In case the personal data owner applies, he ensures that the following person's rights are fulfilled within 30 calendar days at the latest:

- i. Knowing whether the person's own personal data is being processed or not
- ii. Requesting information about personal data
- iii. Explaining the purpose of processing
- iv. Disclosure of third parties to whom personal data is transferred domestically or abroad
- v. Receiving requests for correction of personal data in case of incomplete or incorrect processing and returning when the transaction is completed
- vi. Receiving requests to delete or destroy personal information of the person and return when the transaction is completed
- vii. Receiving requests of the data owner to object in the event of a result against him / her because of the analysis of the processed data exclusively through automated systems and returning when the transaction is completed
- viii. Checking whether personal data is being processed illegally and following up and finalizing requests from the person

Article 12- The Committee takes the necessary measures to eliminate any deficiency or risk in compliance with the Law and Policies of the processes of protection, storage, processing, and destruction of personal data. In this context, the Board audits each new process time reported to it.

Article 13- The Committee, regarding the storage and destruction of personal data:

- i. It determines the storage and destruction period stipulated in the relevant legislation or required for the purpose for which they are processed.
- ii. Pursuant to Article 11/2 of the Regulation on the Deletion, Destruction or Anonymization of Personal Data, it ensures that the personal data that needs to be deleted, destroyed, or anonymized by controlling the personal data processed in periods not exceeding six months, ensures that they are deleted, destroyed, or anonymized.
- iii. It ensures that all transactions regarding the deletion, destruction and anonymization of personal data are recorded and ensures that said records are kept for at least three years, excluding other legal obligations.
- iv. In case of any of the following reasons: it ensures the deletion, destruction, or anonymization of personal data within the framework of the procedures and principles determined in the regulations:

- ✓ If the reasons for processing disappears
- ✓ If it expires
- ✓ At the request of the data owner

Article 14- The Committee creates an action plan in accordance with the violation regulations regarding the work, transaction or actions that it considers to be contrary to the situations reported to it by Vibroser's employees and the procedures and principles specified in the Policies. The Committee prepares the notification to be made to the Personal Data Owner or the Authority regarding the violation, taking into account the provisions of the current legislation regarding the subject, and conducts the correspondence and communication with the Authority.

In applications related to personal data, in cases of improper procedures, the audit is acted and concluded in accordance with the Annex-1 Incident Management scheme. Other departments show the necessary assistance in related matters.

Article 15 - It sends the documents and information requested by the Board within 15 calendar days and enables on-site inspection when necessary.

In case of complaint or for any reason, it follows the Board's notifications and ensures that it is fulfilled within 30 calendar days.

Article 16- The Committee ensures that Vibroser employees are informed in order to prevent unlawful access by processing and destroying personal data in accordance with the law. The necessary procedures are established to ensure that employees who need access to Vibroser personal data, and The Data Controller Representative and the Committee are jointly responsible for the establishment and implementation of this. The list of limited employees who are authorized to access sensitive personal data, and the list is follow-up of this list is provided by the Committee.

The Entry into Force of the Internal Directive and Amendments

Article 17- Internal Directive is put into effect by Vibroser management. The amendments to be made in the Internal Directive and the regulation of the Directive are also subject to the same procedure.

ANNEX-1 EVENT MANAGEMENT PROCESSES (DOCUMENT NUMBER 10.3)