

1.0 PURPOSE

The purpose of this Privacy Notice is to inform data subjects about the conditions for the processing of personal data prescribed under the Law on the Protection of Personal Data No. 6698 ("LPPD"), the retention and security of such data, the transfer of personal data, the conditions for processing, the destruction of personal data, the rights of the data subject with respect to their personal data, and the exercise of such rights, in relation to Naturel Holding and its subsidiaries (the "Holding"), acting as the data controller.

2.0 SCOPE

This Privacy Notice covers:

- The identity of the data controller
- The methods by which personal data are collected and the legal grounds for such collection
- The categories of individuals whose personal data are processed (Data Subject Categorization)
- The categories of personal data processed in relation to data subjects (Data Categories) and examples of data types
- The purposes for which the relevant personal data will be processed
- The parties to whom personal data may be transferred and the purposes of such transfers
- The sharing of personal data with public institutions and organizations and official authorities
- The rights of data subjects regarding their personal data and how they may exercise these rights

3.0 DEFINITIONS

Personal Data: Any information relating to an identified or identifiable natural person.

Data Controller: The natural or legal person who determines the purposes and means of processing personal data and is responsible for the establishment and management of the data recording system. Pursuant to the Law on the Protection of Personal Data No. 6698 (the "Law"), your personal data may be processed by Naturel Holding and its subsidiaries, acting as data controllers, within the scope described below.

Special Categories of Personal Data: Data relating to individuals' race, ethnic origin, political opinions, philosophical beliefs, religion, religious sect or other beliefs, appearance and clothing, membership in associations, foundations or trade unions, health, sexual life, criminal convictions and security measures, as well as biometric and genetic data.

Anonymization: Rendering personal data incapable of being associated, by any means whatsoever, with an identified or identifiable natural person, even when matched with other data.

Processing of Personal Data: Any operation performed on personal data, including the collection, recording, storage, retention, alteration, reorganization, disclosure, transfer, acquisition, making available, classification, or prevention of use of personal data, whether carried out wholly or partially by automated means or by non-

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automated means provided that the data form part of a data recording system. This includes all types of operations performed on personal data from the initial collection of the data onwards.

Data Subject (Relevant Person): The natural person whose personal data are processed.

Deletion of Personal Data: The process of rendering personal data inaccessible and unusable in any way by the relevant users.

Destruction of Personal Data: The process of rendering personal data inaccessible, irretrievable and unusable in any way by anyone.

Periodic Destruction: The process of deleting, destroying or anonymizing personal data, carried out ex officio at recurring intervals specified in the personal data retention and destruction policy, when all conditions for the processing of personal data set forth in the Law have ceased to exist.

4.0 GENERAL PRINCIPLES REGARDING THE PROCESSING OF PERSONAL DATA

Personal Data shall be processed in accordance with the following principles:

- Being processed lawfully and fairly
- Being accurate and, where necessary, kept up to date
- Being processed for specified, explicit and legitimate purposes
- Being relevant, limited and proportionate to the purposes for which they are processed
- Being retained for the period stipulated in the applicable legislation or for as long as necessary for the purposes for which they are processed.

5.0 METHODS AND LEGAL GROUNDS FOR COLLECTING PERSONAL DATA

The Holding collects personal data through its website, e-mail, post, cameras, cookies, notifications served by administrative and judicial authorities, and other communication channels, in audio, electronic or written form, by automated or non-automated means, in accordance with the personal data processing conditions set forth under the Law on the Protection of Personal Data ("LPPD") and on the basis of the applicable legal grounds.

These legal grounds include, in relation to contracts concluded with customers, subcontractors and suppliers: the establishment and performance of a contract; the processing of relevant personal data being required by law; the fulfillment of the Holding's legal obligations; the establishment, exercise or protection of a right; and, in exceptional cases, the legitimate interests of the Holding.

Purpose of Processing	Legal Ground	
Establishment and performance of a contract	Article 5/2(c) of the LPPD	
Fulfillment of legal obligations	Article 5/2(ç) of the LPPD	
Establishment, exercise or protection of a right	Article 5/2(e) of the LPPD	
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Legitimate interest	Article 5/2(f) of the LPPD
Activities requiring explicit consent	Article 5/1 of the LPPD
Special categories of personal data	The relevant processing condition under Article 6 of the LPPD

6.0 DATA CATEGORIES AND EXAMPLES OF DATA TYPES

No	Data Subject	Data Category	Data Types
1	Customer / Prospective Customer / Customer Employee / Customer Representative	Identity Information	Name, Surname, Turkish ID Number
		Contact Information	Address, E-mail, Telephone / Mobile Phone Number
		Financial Information	Bank Account Details, IBAN Number, Payment Information
		Customer Information	Customer Number
		Corporate Identity Information	Title, Company Name
		Legal Transaction and Compliance Information	Signature Circular, Signature
		Physical Location Information	Camera Footage

No	Data Subject	Data Category	Data Types
2	Visitor	Identity Information	Name, Surname, Turkish ID Number
		Corporate Identity Information	Company Name
		Contact Information	Telephone / Mobile Phone Number
		Legal Transaction and Compliance Information	Signature Circular, Signature
		Physical Location Information	Camera Footage, Vehicle License Plate Number

No	Data Subject	Data Category	Data Types
3	Online Visitor	Transaction Security Information, Forms	Name, Surname
		Contact Information	Telephone / Mobile Phone Number
		Website and Cookie Users	IP Address, Device Information, Browser Information, Date and Time of Access, Transaction Security Records, Logs

No	Data Subject	Data Category	Data Types
		Identity Information	Name, Surname, Turkish ID Number

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4	Business Partner / Supplier Employee / Supplier Representative	Contact Information	Address, E-mail, Telephone / Mobile Phone Number
		Financial Information	Bank Account Details, IBAN Number, Payment Information
		Employment/Personnel Information	Resume / CV Information
		Corporate Identity Information	Title, Company Name
		Legal Transaction and Compliance Information	Signature Circular, Signature
		Physical Location Information	Camera Footage

No	Data Subject	Data Category	Data Types
5	Employee / Subcontractor / Subcontractor Employee / Subcontractor Representative / Job Applicant	Identity Information	Name, Surname, Turkish ID Number, Date and Place of Birth
		Contact Information	Address, E-mail, Telephone / Mobile Phone Number
		Financial Information	Bank Account Details, IBAN Number, Payment Information
		Employment/Personnel Information	Resume / CV Information, Training Received, Emergency Contact Person
		Corporate Identity Information	Title, Company Name
		Legal Transaction and Compliance Information	Signature Circular
		Physical Location Information	Camera Footage, Vehicle License Plate Number
		Special Categories of Personal Data	Health Information, Criminal Record

7.0 PURPOSES OF PROCESSING PERSONAL DATA

The Holding transfers personal data, solely for the purposes specified in this Privacy Notice and in accordance with Articles 8 and 9 of the LPPD, to the relevant departments, operating headquarters and branches, business and solution partners, members, affiliates, service providers and consultants, legally authorized public institutions and organizations, and third-party natural or legal persons where necessary for the purpose of the services provided, limited to the personal data processing conditions set forth under Articles 8 and 9 of the Law No. 6698 and the purposes specified above. Personal data may be processed both domestically and abroad.

Personal data subject to the aforementioned domestic and international transfers are protected not only through technical measures designed to ensure their security, but also through legally compliant provisions

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included in our contracts, taking into consideration whether the counterparty to the legal relationship acts as a data controller or data processor.

Where personal data are transferred abroad, the conditions and appropriate safeguards stipulated under Article 9 of the LPPD shall be applied.

Personal data are processed by the Holding for the following purposes:

- Conducting the commercial activities carried out by the Holding
- Carrying out the necessary activities by the Holding's business units and the related business processes
- Planning and/or execution of business activities
- Planning and/or execution of business continuity activities
- Planning and execution of logistics activities
- Planning and execution of corporate communication activities
- Planning and execution of supply chain management processes
- Planning, auditing and execution of information security processes
- Establishment and management of information technology infrastructure
- Monitoring the Holding's finance and accounting activities
- Planning and execution of the Holding's operational processes
- Planning and execution of internal and external training activities of the Holding
- Execution of strategic planning activities
- Management of relationships with business partners and/or suppliers
- Monitoring contract processes and/or legal claims
- Planning and execution of sales processes for products and/or services
- Planning and/or execution of post-sales support services
- Planning and execution of customer relationship management processes
- Monitoring customer requests and/or complaints
- Planning and/or execution of customer satisfaction activities
- Planning and execution of market research activities for the sale and marketing of products and services
- Planning and execution of marketing processes for products and/or services
- Monitoring legal affairs and fulfilling legal obligations
- Fulfillment of obligations arising from applicable legislation
- Providing information to authorized institutions and organizations as required by applicable legislation
- Planning and execution of the operational activities necessary to ensure that the Holding's activities are carried out in compliance with the Holding's procedures and/or applicable legislation
- Planning and execution of the Holding's audit activities
- Planning and execution of relevant processes to maximize the benefits derived from the products or services offered by the Holding
- Ensuring the security of the Holding's premises and/or facilities
- Ensuring the security of the Holding's operations
- Ensuring the security of the Holding's premises and movable assets

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- Ensuring the security of the Holding's fixed assets and/or resources
- Creating and maintaining visitor records

8.0 TRANSFER OF PERSONAL DATA AND PURPOSE OF TRANSFER

The Holding transfers personal data to third parties solely for the purposes specified in this Privacy Notice and in accordance with Article 8 of the Law;

Customer / Customer Representative / Customer Employee / Prospective Customer	Personal data may be shared with lawyers for the review of contracts and the follow-up of legal proceedings; with audit firms during Holding audits within the scope of the audit; and with suppliers as part of hosting services.
Business Partner / Supplier Employee / Supplier Representative	Personal data may be shared with lawyers for the review of contracts and the follow-up of legal proceedings; with relevant parties for the fulfillment of obligations stipulated by legislation and contracts concluded with suppliers; and with audit firms during Holding audits within the scope of the audit.
Visitor / Online Visitor	Log records may be shared with the internet service provider providing the infrastructure, as well as with audit firms during Holding audits within the scope of the audit.
Employee / Subcontractor / Subcontractor Employee / Subcontractor Representative / Job Applicant	Personal data may be shared with healthcare institutions for the purpose of providing necessary treatment in the event of a workplace accident; with customers within the scope of occupational health and safety legislation; with lawyers for the follow-up of legal proceedings; and with suppliers for the provision of transportation services.

9.0 SHARING OF PERSONAL DATA WITH PUBLIC INSTITUTIONS AND ORGANIZATIONS AND OFFICIAL AUTHORITIES

Customer / Customer Employee / Customer Representative / Prospective Customer	Personal data may be shared with the relevant public institutions and organizations for the purpose of making legally required notifications by the Accounting Department; with official persons, institutions and organizations as required by applicable legislation for the fulfillment of obligations stipulated by legislation and contracts concluded with customers; and with official persons,
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	institutions and organizations for the purpose of following up legal proceedings.
Business Partner / Supplier Employee / Supplier Representative	Personal data may be shared with the relevant public institutions and organizations for the purpose of making legally required notifications by the Accounting Department; with representatives of the Ministry of Finance during tax audits, including the sharing of invoices and collection receipts; with banks for the purpose of sharing financial information necessary to fulfill payment obligations arising from existing commercial relationships; and with official persons, institutions and organizations for the fulfillment of obligations stipulated by applicable legislation and contracts concluded with suppliers.
Visitor / Online Visitor	Log records may be shared with official institutions and authorities; camera footage may be shared with official authorities such as the Public Prosecutor's Office and courts upon request.
Employee / Subcontractor / Subcontractor Employee / Subcontractor Representative / Job Applicant	Camera footage may be shared with official authorities such as the Public Prosecutor's Office and courts upon request.

10.0 RIGHTS OF DATA SUBJECTS REGARDING THEIR PERSONAL DATA

The rights of data subjects under Article 11 of the Law are set out below:

- To learn whether their personal data are being processed
- To request information if their personal data have been processed
- To learn the purpose of processing their personal data and whether such data are used in accordance with that purpose
- To know the third parties to whom their personal data are transferred, whether domestically or abroad
- To request the correction of personal data if they have been processed incompletely or inaccurately
- To request the deletion or destruction of personal data within the conditions stipulated under Article 7 of the LPPD
- To request that the operations carried out pursuant to subparagraphs (d) and (e) be notified to third parties to whom the personal data have been transferred
- To object to the occurrence of a result against the individual arising from the analysis of processed data exclusively through automated systems
- To demand compensation for damages in the event that they suffer damage due to the unlawful processing of their personal data

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To exercise your rights regarding your personal data, you may use the “Personal Data Application Form” available on the Holding’s websites or, through the e-mail address registered in our systems, the Holding’s official e-mail address (info@naturelenerji.com.tr) for requests concerning necessary changes, updates and/or deletion, as well as other related requests.

11.0 PROCEDURE FOR THE HOLDING’S RESPONSE TO APPLICATIONS

The requests contained in an application submitted by a data subject shall be concluded by the Holding as soon as possible, depending on the nature of the request, and in any event within thirty days at the latest. However, where the processing of a request requires an additional cost, the fee specified in the tariff determined by the Personal Data Protection Board may be charged by the Holding.

Following the necessary assessment, the application may be accepted by the Holding or rejected with the reasons for rejection clearly stated. The outcome of the application shall be communicated to the relevant data subject in writing or electronically.

If the request contained in the application is accepted, the Holding shall take the necessary action to fulfill the request.

In the event that the data subject’s application is rejected, the response provided by the Holding is deemed inadequate, or the statutory response period is exceeded, the data subject has the right to lodge a complaint with the Personal Data Protection Board within thirty days from the date on which they become aware of the response and, in any event, within sixty days from the date of application.

12.0 CIRCUMSTANCES IN WHICH DATA SUBJECTS MAY NOT EXERCISE THEIR RIGHTS REGARDING THEIR PERSONAL DATA

Data subjects may not exercise their rights in the following circumstances pursuant to Article 28 of the Law:

1. Where personal data are processed by natural persons solely in connection with activities relating to themselves or their family members living in the same household, provided that such data are not disclosed to third parties and the obligations relating to data security are complied with;
2. Where personal data are processed for purposes such as research, planning and statistics by making them anonymous for official statistical purposes;
3. Where personal data are processed for artistic, historical, literary or scientific purposes, or within the scope of freedom of expression, provided that such processing does not violate national defense, national security, public security, public order, economic security, privacy or personal rights, or constitute a crime;
4. Where personal data are processed as part of preventive, protective or intelligence activities carried out by public institutions and organizations authorized by law for the purposes of ensuring national defense, national security, public security, public order or economic security;
5. Where personal data are processed by judicial authorities or execution authorities as part of investigation, prosecution, trial or execution proceedings.

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Pursuant to Article 28(2) of the Law, data subjects may not exercise the rights set forth under Section 5 of this Privacy and Personal Data Protection Policy in the following circumstances, except for the right to demand compensation for damages:

1. Where the processing of personal data is necessary for the prevention of crime or for criminal investigation;
2. Where personal data made public by the data subject are processed;
3. Where the processing of personal data is necessary for the performance of inspection or regulatory duties, or for disciplinary investigation or prosecution, by public institutions and organizations authorized by law and professional organizations having the status of public institutions;
4. Where the processing of personal data is necessary for the protection of the State's economic and financial interests in relation to budgetary, tax and financial matters.

13.0 CONDITIONS FOR THE DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

The Holding retains the personal data it collects and processes through physical and electronic channels, including its website and e-mail, within the scope of its business processes, for the periods prescribed by the applicable laws and/or for as long as required by the purposes of processing, in accordance with Articles 7 and 17 of the Law and Article 138 of the Turkish Penal Code.

Upon expiry of these retention periods, the Holding shall delete, destroy or anonymize the relevant personal data in accordance with the provisions of the Regulation on the Deletion, Destruction or Anonymization of Personal Data and the Guideline on the Deletion, Destruction or Anonymization of Personal Data.

14.0 AMENDMENTS TO THE PRIVACY AND PERSONAL DATA PROTECTION POLICY

The Privacy Notice may be updated in accordance with changes in applicable legislation, the Holding's activities, or its personal data processing processes. In the event of a change in the purpose of processing personal data, the relevant data subjects shall be duly informed before the new processing activity commences.

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