## A. DATA CONTROLLER'S IDENTITY

On April 7, 2016, the "Law on the Protection of Personal Data" numbered 6698 (hereinafter referred to as the "Law") was published and came into effect. Within the scope of this law, our company Alfer Mühendislik Taah. Tic. Ve San. A.Ş., (hereinafter referred to as "ALFER") is the "Data Controller" and performs the necessary compliance efforts to fulfill the obligations required by this status. This information is provided to fulfill the notification obligation of ALFER to its Employees/Prospective Employees and Interns within the scope of the Law. This Information Notice will be updated by ALFER when necessary, and the updated version will be published. Additionally, this document has been prepared as an annex to the existing employment contracts for ALFER employees.

Under the Law, personal data covers any kind of data related to an identified or identifiable real person. Special Categories of Personal Data, a specific type of personal data, refer to data such as race, ethnic origin, political opinions, philosophical beliefs, religion, sect, other beliefs, appearance, clothing, membership in associations, foundations, or unions, health, sexual life, criminal convictions, and security measures, biometric and genetic data.

Processing of personal data includes any operation performed on data such as obtaining, recording, storing, retaining, modifying, reorganizing, disclosing, transferring, taking over, making data accessible, classifying, or preventing its use, either completely or partially, by automated or non-automated means as part of any data recording system.

#### B. METHOD OF DATA COLLECTION AND LEGAL BASIS

ALFER collects and processes the data of its Employees/Prospective Employees and interns in accordance with the Personal Data Protection Law (KVKK) through the following channels, either automated or non-automated, and in compliance with the personal data processing conditions and purposes specified in Articles 5 and 6 of the KVKK. Your personal data is obtained through fully or partially automated methods or non-automated methods as part of a data recording system. The personal data is collected through the following means:

- Application forms published in written or electronic format,
- Resumes sent by candidates to ALFER via electronic mail, mail, references, and similar methods,
- Accounts operated on various social media channels on behalf of ALFER,
- Correspondence conducted via electronic mail addresses, short messages, multimedia messages, and other communication methods, including information forms,
- Through reference individuals,
- Through employment or consulting firms working with ALFER,
- Through research and checks conducted by ALFER to verify the accuracy of the information provided by the candidate.

These data will be processed within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the KVKK, such as providing better and quality services, making decisions about whether the relevant individual is suitable for the desired position, carrying out the processes of employee candidates/interns, employee satisfaction and loyalty processes, fulfillment of contractual and legal obligations for employees, processes related to additional rights

and benefits for employees, conducting audits/ethical activities, ensuring compliance with regulations, performing financial and accounting tasks, planning human resources processes, conducting performance evaluation processes, conducting storage and archive activities, conducting contract processes, implementing the salary policy, conducting talent/career development activities, providing information to authorized persons, institutions, and organizations, foreign personnel work and residence permit procedures, and providing corporate and administrative management. The personal data processing conditions specified in Article 5 of the KVKK are as follows:

- 1. Personal data cannot be processed without the explicit consent of the related person.
- 2. In case of the existence of one of the following conditions, personal data may be processed without the explicit consent of the related person:
- Explicitly prescribed in the laws,
- Mandatory for the protection of life or physical integrity of the person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid,
- Processing of personal data belonging to the parties of a contract, provided that it is directly related to the conclusion or performance of the contract,
- Mandatory for the data controller to fulfill its legal obligations,
- Made public by the related person,
- Mandatory for the establishment, use, or protection of a right,
- Mandatory for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the related person are not harmed.

The processing of Special Categories of Personal Data specified in Article 6 of the KVKK is subject to the following conditions:

- 1. The processing of Special Categories of Personal Data, except for health and sexual life, is strictly prohibited without the explicit consent of the related person.
- 2. Personal data concerning health and sexual life may only be processed without explicit consent in the cases explicitly stipulated by the laws. Personal data regarding health and sexual life can only be processed without explicit consent by persons or institutions subject to confidentiality obligation or by authorized institutions and organizations for the purposes of protecting public health, conducting preventive medicine, medical diagnosis, treatment, and care services, planning and managing health services and their financing.
- 3. In the processing of Special Categories of Personal Data, it is required to take additional measures determined by the Personal Data Protection Board.

In cases where explicit consent is required according to the relevant articles, your explicit consent will be obtained. However, in accordance with the conditions stated in the second paragraph of Article 5, personal data may be processed without the explicit consent of the related person.

The personal data collected for these purposes include "identity information, passport information, contact information, personnel information, health information to the extent necessary, information about family members and close relatives, employment information, educational information, vocational training information, financial information such as bank account numbers, technical and

visual information, information related to salary garnishment due to execution proceedings, information regarding legal disputes between you and the company, vehicle tracking and location data, entry and exit information to the workplace, military service information, physical space security information, and reference information."

In accordance with the mandatory provisions of the laws, it is essential to keep the personal information of individuals accurate and up-to-date. Therefore, employees may be requested to update their personal information at certain intervals. If there is any change in their information, employees are expected to inform the Human Resources Department accordingly.

ALFER cannot be held responsible for any incorrect information provided by the employee under any circumstances.

### C. PURPOSES OF PROCESSING PERSONAL DATA

Your personal data may be processed by the data controller, ALFER, or legal/natural persons appointed by ALFER in accordance with the Personal Data Protection Law (KVKK) for the following purposes

- Identity verification and registration creation.
- Evaluation of suitability for the desired position, and if found unsuitable, consideration for similar positions.
- Fulfillment of legal obligations related to personnel employment (e.g., contract signing, social security registration, reporting to relevant authorities, and other legal processes).
- Opening salary accounts for personnel, providing company resources such as rental cars, phones, phone lines, meal cards, and facilitating automatic individual retirement processes.
- Various human resources applications (e.g., Job Analyses, Job Descriptions, Organizational Charts, Employee Satisfaction Surveys, Recruitment Processes, Training, Promotions, Performance Management, Orientation, Compensation and Benefit Studies, Succession Planning, Career Planning, Talent Pool Creation, Reward and Recognition Systems, HR Regulations, Organizational Culture Studies, and other HR-related processes).
- Emergency medical interventions.
- Execution of contractual processes.
- Monitoring and managing health conditions for sickness leave or to enable personnel to perform their duties.
- Tracking salary deductions due to garnishment or for the purpose of following up on legal disputes with the company, and monitoring case files.
- Ensuring compliance with ALFER's quality, information security, and privacy policies and standards.
- Organizing internal and external training programs for company personnel.
- Organizing external assignments and domestic/international travels.
- Organization and implementation of Occupational Health and Safety processes.
- Contacting individuals provided by the employee in case of emergencies with their consent.
- Archiving and record-keeping activities (as required by legal retention periods).
- Calculation of personnel expenses.
- Identification and control of personnel entry and exit from the company.
- Preparation of reports and analyses for upper management.
- Execution of functions such as software, enterprise resource planning, reporting, marketing, etc.
- Processing of work and residence permits for foreign personnel.

- Conducting Employee Satisfaction and Loyalty Processes (e.g., promotions, providing food assistance, and participation in campaigns).
- Recording camera footage for workplace confidentiality and security practices.
- Fulfillment of all requirements specified by laws and regulations (tax legislation, social security legislation, debt law, commercial law, occupational health and safety law, electronic communication legislation, identity reporting law, etc.).
- Compliance with e-invoice, e-archive, and e-delivery obligations.
- Fulfilling requests from public institutions and organizations as required by legal regulations.
- Fulfilling legal obligations specified in KVKK.

#### E. RETENTION PERIOD OF PERSONAL DATA

Your personal data will be retained for the purposes mentioned above as long as your employment contract is in effect. Personal data that must be retained according to legal obligations, such as social security and tax regulations, will be stored for 10 (ten) years after the termination of your employment. Your health reports will be kept for 15 (fifteen) years following your departure from the company, as required by Law No. 6331. The retention period for daily camera recordings is 15 (fifteen) days, after which they are automatically deleted. Only records related to work accidents and legal incidents are retained and preserved for the required legal periods. In the event that the employment contract with a candidate employee does not begin, their personal data will be kept for 1 (one) year for evaluation in similar positions. After this period, your personal data will be deleted, destroyed, or anonymized by ALFER or upon your request, in accordance with the methods defined under the Personal Data Protection Law and related regulations. You have the right to withdraw your consent for the processing of personal data, except for data that must be processed by law.

# F. PRINCIPLES OBSERVED BY THE COMPANY IN THE PROCESSING OF PERSONAL DATA

- Acting in accordance with the law and principles of honesty,
- Keeping accurate and necessary up-to-date data,
- Retaining data for specific, clear, and legitimate purposes,
- Adhering to the principles of relevance, limitation, and proportionality in data processing activities,
- Preserving personal data for the periods specified in the legislation and as long as required for the purposes they are processed.

### G. RIGHTS OF THE DATA SUBJECT

Under the scope of KVKK, you have the following rights regarding your personal data:

- To learn whether your personal data is being processed or not,
- To request information about the processing of your personal data if it has been processed,
- To learn the purpose of the processing of personal data and whether they are used in line with that purpose,
- To be informed of the third parties to whom your personal data is transferred within the country or abroad,
- To request the correction of your incomplete or inaccurate personal data,

- To request the deletion or destruction of your personal data when the reasons requiring its processing cease to exist,
- To request the notification of the correction or deletion of your personal data to third parties to whom it has been transferred, if applicable,
- To object to the occurrence of a result against you based solely on the analysis of processed data through automatic systems,
- To demand compensation for damages in case you incur damages due to the unlawful processing of your personal data.

To exercise the above-mentioned rights, you can submit your written request to the address "Ahi Evran Osb Mah. 1. OSB Oğuz Cad. No: 15 Sincan ANKARA", clearly stating that the request is related to KVKK, and sign it with your wet signature or send it to our registered email address alfer@hs03.kep.tr with a secure electronic signature, mobile signature, or using the email address previously notified by you and registered in the data controller's system (insankaynaklari@alfer.com.tr). The applications must be made in Turkish.

In your application, you are required to provide your full name, signature if the application is in writing, Republic of Turkey identification number for Turkish citizens, nationality and passport number/ID number for foreigners, address for notification, if any, email address, telephone or fax number, and the subject of your request.

For your application to be considered, it must be clear and understandable, related to your person, or if you are acting on behalf of someone else, you must provide specific authorization and document your authority. The application should include your identity and address information, and the necessary documents to verify your identity should be attached.

Your applications will be concluded as soon as possible, and at the latest within 30 days. If the response to the relevant person's application is to be given in writing, no fee will be charged for up to ten pages. A processing fee of 1 TL per page may be charged for each page exceeding ten pages. If the response is given on a record medium such as a CD or flash drive, the fee requested by ALFER cannot exceed the cost of the record medium.