

**TAV MILAS BODRUM TERMINAL  
ISLETMECILIGI ANONIM SIRKETI  
POLICY ON THE PROTECTION OF  
PERSONAL DATA**

## 1. CHAPTER

### PURPOSE, SCOPE, DEFINITIONS & BASE DOCUMENTS

#### 1.1. Purpose

Protection of personal data is one of the top priorities of TAV Milas Bodrum Terminal Isletmeciligi Anonim Sirketi (the “**Company**” or “**TAV MİLAS BODRUM**”) as defined below, make every effort to comply with all applicable legislation in this regard. The most important pillar of this issue is the Policy on Protection and Processing of Personal Data, of TAV Milas Bodrum Terminal Isletmeciligi Anonim Sirketi (“**Policy**”).

Within the framework of this Policy, the principles adopted in the performance of personal data processing activities carried out by our Company and the basic principles adopted in terms of compliance of our Company's data processing activities with the regulations contained in the Personal Data Protection Law No. 6698 (the “**Law**”) are explained, and thus our Company ensures necessary transparency by informing the data subjects. With full awareness of our responsibility in this regard, your personal data shall be processed and protected within the scope of this Policy.

#### 1.2. Scope

This Policy applies to all personal data of the persons other than employees of our Company, that are processed by automated means or - provided that they are part of any data filing system - non-automated means.

Detailed information about such data subjects can be accessed via the ANNEX-1 document (“**ANNEX 1 - Data Subjects**”) of this Policy.

The activities carried out by our Company related to the protection of the personal data of our employees, are managed under of TAV Milas Bodrum Terminal Isletmeciligi Anonim Sirketi Policy on Protection and Processing of Employees' Personal Data, which is written in parallel with the principles of this Policy.

#### 1.3. Definitions & Abbreviations

**Explicit Consent:** The consent given with limited scope, being informed and freely on a specific subject, for the purpose of data processing.

**Anonymization:** Rendering personal data impossible to link with an identified or identifiable natural person, even through matching them with other data.

**Employee(s):** Employees of the Company

**Confidential Information:** refers to information of critical importance at such a degree that, if it is disclosed, may cause financial damage to TAV Milas Bodrum or the Group Companies, disrupt their services, affect their relations with customers and/or suppliers, reduce the motivation and productivity of the employees, undermine their reputation/brand value, and cause the imposition of sanctions pursuant to laws/regulations.

Confidential Information may be contained on a paper document or in electronic media (Company server, Computer, USB Memory Stick, Portable External Disk, Tablet Computer, Smartphone, CD, DVD, etc.).

**Human Resources Departments:** Human Resources Departments of the of TAV Milas Bodrum Terminal Isletmeciligi Anonim Sirketi

**Personal Data:** All kinds of information relating to an identified or identifiable natural person.

**Data Subject:** The natural person, whose Personal Data are processed. For example; customers, suppliers, employees, etc.

**Processing of Personal Data:** All kinds of transactions performed on the data, such as obtaining, recording, storing, keeping, amending, rearranging, disclosing, transferring, taking over, rendering obtainable, classifying, or preventing the use of personal data by fully or partially automatic means or by non-automatic means as part of any data recording system.

**PDP Law:** The Personal Data Protection Law No. 6698, dated 24 March 2016, published in the Official Gazette, numbered 29677 and dated April 7, 2016.

**PDP Committee:** The Personal Data Protection Committee, composed of the Data Protection Officer, Senior Legal Counsel, Human Resources Coordinator, and Information Technology Governance and Information Security Manager, which is vested with decision-making authority and the power to submit matters to senior management, and to which the Data Protection Supervisors report, for the purpose of ensuring the continuous management and improvement of the Data Protection Compliance Program.

**PDP Supervisors:** The supervisors who shall ensure necessary coordination in the Company within the scope of ensuring, protecting, and maintaining the compliance by the Company, with the legislation on protection of Personal Data, and who shall work affiliated to the PDP Committee.

**Special Category of Special Category of Personal Data:** The data relating to the race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, membership to associations, foundations or trade-unions, health, sexual life, criminal convictions of, and security measures imposed on, Persons and their biometric and genetic data.

**Policy:** of TAV Milas Bodrum Terminal Isletmeciligi Anonim Sirketi Policy on Protection and Processing of Personal Data.

**Company:** of TAV Milas Bodrum Terminal Isletmeciligi Anonim Sirketi

**Data breaches:** The incidents where reasonable doubts arise regarding any unlawful seizure, collection, modification, copying, distribution, or use of personal data.

**Data Protection Officer:** The person who works under the Compliance Department of TAV Milas Bodrum, and is responsible for the continuous management and development of the PDP Compliance Program at of TAV Milas Bodrum Terminal Isletmeciligi Anonim Sirketi according to the PDP Law and related legislation.

**Data Controller:** The person who determines the purposes and means of processing Personal Data and manages the place where the data are kept systematically.

**Senior Management:** Members of the Executive Committee at of TAV Milas Bodrum Terminal Isletmeciligi Anonim Sirketi

#### **Base Documents**

This Policy has been prepared for compliance of the activities carried out by of TAV Milas Bodrum Terminal Isletmeciligi Anonim Sirketi, with the PDP Law, relevant secondary legislation, and the decisions of the PDP Board, by taking into account all relevant local laws and regulations, internal and general policies and procedures in force for the purpose of protecting and processing of personal data.

## **2. CHAPTER**

### **GENERAL PRINCIPLES**

#### **PROVISIONS RELATED TO THE PROCESSING OF PERSONAL DATA**

##### **2.1 Processing of Personal Data in Accordance with the Principles Set Forth in the Legislation**

###### **2.1.1. Processing Lawfully and In Compliance with Honesty Principle**

Personal data shall be processed in accordance with the general principle of trust and honesty, in such a way that it shall not harm the fundamental rights and freedoms of persons. In this context, personal data shall be processed to the extent, and limited to, as required by the business activities of our Company.

###### **2.1.2. Ensuring that Personal Data is Accurate and Kept Up-to-date when Necessary**

Our Company shall take necessary measures to ensure that personal data is accurate and up-to-date during the period of processing, and shall establish necessary mechanisms to ensure the accuracy and up-to-dateness of personal data, in certain intervals.

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

Our Company shall clearly set out the purposes for processing personal data, and also shall process them in line with their business activities within the scope of the purposes related to these activities.

###### **2.1.4. Being Relevant, Limited, and Proportionate to the Purposes for Which they are Processed**

Our Company shall collect only personal data having the nature, and to the extent, as required by business activities and process them limited to the specified purposes.

###### **2.1.5. Keeping Them the Period Laid Down by Relevant Legislation or Required for the Purpose for Which the They are Processed**

Our Company shall store personal data for the period required for the purpose for which they are processed and for the minimum period stipulated in the relevant legislation. In this context, our Company shall first determine whether a period is stipulated for the storage of personal data in the relevant legislation and, if a period is determined, shall act in accordance with this period. If there is no legal period, personal data shall be stored for the period required for the purpose for which they are processed. Personal data shall be destroyed at the end of the specified storage periods in accordance with the periodic destruction periods or the data owner's request and by the determined destruction methods (deletion and/or destruction and/or anonymization).

##### **2.2 LEGAL BASES FOR PROCESSING OF PERSONAL DATA**

The explicit consent of the personal data owner is only one of the legal grounds that makes the lawful processing of personal data possible, and in the existence of one of the following conditions, personal data shall be processed by our Company without the explicit consent of the data subject.

Except for express consent, the basis of personal data processing may be only one of the following conditions as well as more than one condition may be the basis of the same personal data processing activity. If the processed data is the Special Category of Personal Data, the terms contained in title 2.3 of this Policy ("**Processing of Special Category of Special Category Personal Data**") and the provisions of the Policy on Protection and Processing of Special Category of Special Category Personal Data shall apply.

#### **2.2.1 Expressly Provided for by the Laws.**

If it is expressly provided for in the law, in other words, if there is a clear provision in relevant law regarding processing of personal data, personal data of the data subject may be processed by our Company within the framework stipulated in the legislation.

#### **2.2.2 Inability to Obtain Explicit Consent of the Person Concerned due to Practical Impossibility**

If the processing of personal data is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to any practical impossibility or whose consent is not deemed legally valid, the personal data of the data subject may be processed.

#### **2.2.3 Being Directly Related to the Entering Into or Performing a Contract**

If processing of personal data of the parties of a contract is necessary, this condition may be deemed to have been met provided that it is directly related to the establishment or performance of the contract.

#### **2.2.4 Fulfillment of the Legal Obligations by the Company**

If data processing is mandatory for our Company to meet their legal obligations, the personal data of the data subject may be processed.

#### **2.2.5 Making Personal Data Public by the Data Subject**

If the personal data have been made public by the data subject himself/herself, the personal data may be processed limited to the purpose of making them public.

#### **2.2.6 Data Processing is Necessary for the Establishment or Protection of any Right**

If the processing of data is necessary for the establishment, exercise or protection of any right, personal data of the data subject may be processed.

#### **2.2.7 Processing is Necessary for the Legitimate Interest of our Company**

If the processing of data is mandatory for the legitimate interests of our Company and TAV Group Companies, personal data of the data subject may be processed, provided that this should not impair fundamental rights and freedoms of the data subject.

### **2.3 Processing of Special Category of Personal Data**

Special attention is attached to the personal data deemed sensitive, due to the risk of victimization or discrimination of persons when such data are processed unlawfully. These "Special Category of " personal data are the data relating to the race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, membership to associations, foundations or trade-

unions, health, sexual life, criminal convictions of, and security measures imposed on, Persons and their biometric and genetic data.

Special Categories of Personal Data are processed by the Company in accordance with the principles set out in this Policy, pursuant to Article 6 of the Law, and provided that all necessary administrative and technical measures, including the adequate safeguards determined by the Personal Data Protection Board, are duly implemented, where one of the following conditions is met:

- (i) Where the explicit consent of the data subject has been obtained;
- (ii) Where processing is expressly stipulated by law;
- (iii) Where processing is mandatory for the protection of the life or physical integrity of the data subject or of another person who is unable to express consent due to actual impossibility or whose consent is not legally valid;
- (iv) Where the personal data has been made public by the data subject, provided that such processing is in line with the data subject's intention to make the data public;
- (v) Where processing is mandatory for the establishment, exercise, or protection of a legal right;
- (vi) Where processing is carried out by persons subject to a confidentiality obligation or by authorized institutions and organizations for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning, management, and financing of health services;
- (vii) Where processing is mandatory for the fulfillment of legal obligations in the fields of employment, occupational health and safety, social security, social services, and social assistance;
- (viii) Where processing is carried out by foundations, associations, or other non-profit organizations or formations established for political, philosophical, religious, or trade union purposes, provided that such processing is in accordance with the relevant legislation and purposes of such organizations, limited to their fields of activity, not disclosed to third parties, and relates solely to their current or former members, affiliates, or persons who are in regular contact with such organizations or formations.

## 2.4 Categories of Personal Data Processed and Purposes of Processing

The categories of personal data processed by our Company in accordance with the Law and other relevant provisions of the legislation within the framework of the purposes and conditions set out in this Policy and detailed information about these categories can be accessed via ANNEX-2 ("**Categories of Personal Data**") of this Policy.

In accordance with the Law and other relevant legislation, within the scope of the conditions for the processing of personal data and Special Category of Personal Data detailed in this Policy, the purposes of personal data processing of our Company are as follows:

1. Planning and/or executing human resources policies and processes of our Company,
2. Planning and/or execution of the activities to ensure the legal and technical security of our Company and related persons in business relations with our Company,
3. Planning and/or performing the activities required for recommending and promoting the products and services offered by our Company and/or for and on behalf of our Company, by customizing them according to taste, usage habits and needs of related persons,
4. Making necessary studies/works and conducting related business processes in order to provide related persons with the opportunity to benefit from the products and/or services offered by our Company and/or for and on behalf of our Company,

5. Making necessary studies/works, by our related business units, for the performance of commercial and/or operational activities carried out by our Company, and conducting the business processes in relation thereto,
6. Planning and/or implementing commercial and/or business strategies of our Company
- 7.

Detailed information about such processing purposes can be accessed via the ANNEX-3 document ("**ANNEX 3 - Processing Purposes of Personal Data**") of this Policy.

### **3. CHAPTER PROVISIONS RELATING TO TRANSFERRING PERSONAL DATA**

Our company can transfer the personal data and Special Category of personal data of the data subject, to third parties by taking necessary security measures in line with the lawful purposes of personal data processing. Our Company shall comply with the provisions set forth in articles 8 and 9 of the Law, in this respect. Detailed information on this issue can be accessed via ANNEX ("**ANNEX 4 - Third Parties to Which Personal Data is Transferred by our Company and the Purposes of Transfer**") of this Policy.

#### **3.1 Transfer of Personal Data:**

If one or more of the following conditions are met, even without the express consent of the data subject, personal data may be transferred to third parties by taking due care and taking all necessary security measures, including the methods prescribed by the Board, by our Company.

- In case the activities relating to processing of personal data, are expressly provided for in the laws,
- Transfer of personal data by the Company is directly related to and necessary for the establishment or execution of a contract,
- Transfer of personal data is mandatory for our Company to fulfill their legal obligations or for the execution of business processes,
- Transfer of personal data by our Company in a limited manner for making them public, provided that the data subject has already made them public,
- If the transfer of personal data by the Company is mandatory for the establishment, use or protection of the rights of the Company, or the data subject, or third parties.
- If it is mandatory to engage in personal data transfer activities for the legitimate interests of the Company, provided that it does not damage the fundamental rights and freedoms of the data subject.
- If the processing of personal data is necessary for the protection of life or physical integrity of the person himself/herself or of any other person, who is unable to explain his/her consent due to the practical impossibility, or whose consent is not deemed legally valid.

Where Personal Data are to be transferred abroad, in addition to the conditions set out above, Personal Data shall be transferred by the Company (i) to foreign countries for which an adequacy decision has been announced by the Board ("Foreign Countries with an Adequacy Decision"), or (ii) in the absence of an adequacy decision ("Foreign Countries without an Adequacy Decision"), provided that one of the Appropriate Safeguards specified under Article 9/4 of the Law is ensured ("Appropriate Safeguards").

#### **3.2 Transferring Special Category of Personal Data:**

Special Categories of Personal Data may be transferred by the Company in accordance with the principles set out in this Policy, pursuant to Article 6 of the Law, provided that all necessary

administrative and technical measures, including the adequate safeguards determined by the Personal Data Protection Board, are duly implemented, and where one of the following conditions is met:

- (i) Where the explicit consent of the data subject has been obtained;
- (ii) Where the transfer is expressly stipulated by law;
- (iii) Where the transfer is mandatory for the protection of the life or physical integrity of the data subject or of another person who is unable to express consent due to actual impossibility or whose consent is not legally valid;
- (iv) Where the personal data has been made public by the data subject, provided that such transfer is in line with the data subject's intention to make the data public;
- (v) Where the transfer is mandatory for the establishment, exercise, or protection of a legal right;
- (vi) Where the transfer is carried out by persons subject to a confidentiality obligation or by authorized institutions and organizations for the purposes of protecting public health, preventive medicine, medical diagnosis, treatment and care services, and the planning, management, and financing of health services;
- (vii) Where the transfer is mandatory for the fulfillment of legal obligations in the fields of employment, occupational health and safety, social security, social services, and social assistance;
- (viii) Where the transfer is carried out by foundations, associations, or other non-profit organizations or formations established for political, philosophical, religious, or trade union purposes, provided that such transfer is in accordance with the relevant legislation and purposes of such organizations, limited to their fields of activity, not disclosed to third parties, and relates solely to their current or former members, affiliates, or persons who are in regular contact with such organizations or formations.

Where Special Categories of Personal Data are to be transferred abroad, in addition to the conditions set out above, such transfer shall be carried out only to Foreign Countries with an Adequacy Decision or, in the absence of an adequacy decision, to Foreign Countries without an Adequacy Decision, provided that one of the Appropriate Safeguards is ensured.

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#### **4. CHAPTER INFORMING DATA SUBJECT**

Our Company shall inform the data subjects in accordance with Article 10 of the Law and secondary legislation, about who processes their personal data as a data controller, the purposes for which they process, the purposes for which they share with whom, the methods they use to collect and its legal grounds, and the rights that data subjects have within the scope of the processing of their personal data.



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## **5. CHAPTER STORAGE AND DESTRUCTION OF PERSONAL DATA**

Our Company shall store personal data for the period required for the purpose for which they are processed and for the period set forth in the relevant legislation. In this context, our Company shall first determine whether a period is set forth for the storage of personal data in the relevant legislation and, if a period is set forth, shall act in accordance with that period. If there is no legal period, personal data shall be stored for the period required for the purpose for which they are processed. Personal data shall be destroyed at the end of the specified storage periods in accordance with the periodic destruction periods or the data owner's request and by the determined destruction methods (deletion

and/or destruction and/or anonymization). The provisions of the Company's Policy on Storage and Destruction on Personal Data, shall apply to this in relation to the process.



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## 6. CHAPTER PROVISIONS IN RELATION TO PROTECTION OF PERSONAL DATA

Our Company take necessary measures pursuant to Article 12 of the Law based on the nature of the data to be protected to prevent unlawful disclosure, access, transfer, or other security deficiencies that may occur in other forms of personal data. In this context, our Company take administrative measures, carry out audits, or have them carried out, to ensure the necessary level of security in accordance with the guidelines published by the Personal Data Protection Board (“**Board**”).

In this context, the technical and administrative measures taken by our Company for the protection of personal data, are applied carefully in terms of Special Category of Personal Data and the necessary audits are provided within our Company.

## **6.1 Raising Awareness of the Business Units on the Protection and Processing of Personal Data and Supervision Thereof**

Our Company provide the business units with the necessary training in order to raise awareness about the unlawful processing of personal data, preventing unlawful access to data, and ensuring the preservation of data.

Our Company shall establish the necessary systems to raise awareness of the existing employees and newly recruited employees about the protection of personal data and, if necessary, shall work with consultants on this issue. Accordingly, our Company shall evaluate participation in related trainings, seminars and information sessions and shall organize new trainings in parallel with updating the relevant legislation.

Our Company shall also conduct audits at regular intervals and shall take actions to improve processes.



## **7. CHAPTER RIGHTS OF DATA SUBJECTS AND EXERCISING THESE RIGHTS**

### **7.1 RIGHTS OF DATA SUBJECT**

The data subjects have the following rights:

- 1) To learn whether personal data are processed or not,
- 2) If personal data are processed, to request information in relation thereto,
- 3) To learn the purpose of processing personal data and whether they are used in compliance with intended purpose,
- 4) To know the third persons, to whom personal data are transferred in Turkey and abroad,
- 5) In case personal data are processed incompletely or incorrectly, to request the correction thereof and to request that any operation carried out in this context is reported to the third persons, to whom personal data are transferred,
- 6) Despite being processed in compliance with the provisions of this Law and other relevant laws, to request that personal data shall be erased or destructed in the event that the reasons for

the processing no longer exist and any operation carried out in this context is reported to the third persons, to whom the personal data are transferred,

- 7) To object to the occurrence of a result against the person himself/herself by analyzing, solely through automated systems, the data processed,
- 8) To claim indemnification of any damage arising from unlawful processing of personal data.

## 7.2 EXERCISING BY THE DATA SUBJECT, OF HIS/HER RIGHTS

Data subjects can submit their requests for the rights listed in Section 7.1 ("**Rights of the Data Subject**") to our Company by the means determined by the Board. Accordingly, they shall be able to use the "Data Subject Request Form", which can be accessed via (<https://izmirairport.com>) or the respective web address of the relevant TAV Group Company.

## 7.3 RESPONDING TO THE APPLICATIONS BY OUR COMPANY

Our Company take the necessary administrative and technical measures to finalize requests to be made by the data subject in accordance with the law and secondary legislation.

If data subject sends his/her request in respect of the rights contained in Section 7.1 ("**Rights of Data Subject**") to our Company in accordance with the due process, our Company shall finalize the request free of charge as soon as possible and within 30 (thirty) days at the latest depending on the nature of the request. However, if the action requires any extra cost, a fee may be charged in accordance with the tariff set by the Board.



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## 8. CHAPTER

### ROLES & RESPONSIBILITIES

Within the scope of the protection and processing of personal data, different departments and individuals within the Company have various roles and responsibilities. In this context, all relevant parties and their respective duties and responsibilities are specified in this section.

#### A. Senior Management

Senior Management ensures that the necessary administrative and technical measures are taken and supervised in order to ensure the protection, processing, and security of personal data. In this context, Senior Management:

- Ensures that a strategic approach to personal data protection is established across the Company,
- Ensures the establishment of the necessary organizational structure and allocation of resources for the implementation of policies and procedures related to personal data protection,
- Oversees the effective implementation of compliance activities related to personal data protection.

#### B. Data Protection Officer

The Data Protection Officer:

- Submits the Personal Data Protection and Processing Policy to the PDPC Committee for periodic review and coordinates the update of the Policy when deemed necessary,
- Provides guidance and support to employees regarding whether the processing of personal data complies with applicable legislation and internal company policies and procedures,
- Organizes the necessary training activities for employees in order to increase awareness regarding the protection of personal data,
- Coordinates the evaluation and management of processes in case of suspected or actual personal data breaches,
- Provides guidance to relevant departments during the evaluation of requests submitted by data subjects.

#### C. PDPC Committee

The PDPC Committee is responsible for:

- Reviewing and evaluating the opinions submitted by PDPC Responsible Persons regarding the updating or improvement of information systems within the scope of technical requirements related to personal data processing or data security, and submitting such matters to Senior Management for approval where necessary,
- Reviewing notifications related to personal data security breaches and identified risks, determining the necessary actions to eliminate such breaches, and establishing strategies to ensure that risks are maintained at a manageable level,

- Monitoring the processes related to the evaluation of requests submitted by data subjects and making decisions where necessary,
- Supervising the establishment and implementation of appropriate administrative and technical security controls within the scope of information technologies in order to protect the confidentiality, security, and integrity of systems where personal data are processed and managed, and to ensure their availability.

#### **D. Internal Audit Responsible**

Internal audits are conducted within the Company in order to identify legal and technical risks related to personal data protection and processing processes and to ensure the implementation of controls for managing such risks.

The Internal Audit Responsible is responsible for:

- Auditing whether the processes involving the processing of personal data are organized in accordance with this Policy and implemented by the relevant business units through internal audits,
- Ensuring that confidentiality and security controls related to personal data are periodically audited, evaluated, and reviewed on a risk-based approach in accordance with applicable legislation.

#### **E. Employees**

Employees are responsible for:

- Acting in compliance with this Policy and relevant company procedures,
- Performing their duties and responsibilities in accordance with the principles related to the protection of personal data,
- Protecting the confidentiality of personal data accessed within the scope of their duties and using such data only within the limits of their authorization,
- Immediately reporting any risk, breach, or suspected non-compliance related to personal data protection to the Data Protection Officer or the PDPC Committee,
- Consulting the Data Protection Officer or the PDPC Committee in case of any questions regarding the processing and protection of personal data.

## **9. CHAPTER**

### **ANNEXES & REFERENCES**

## ANNEX-1 PERSONAL DATA SUBJECTS

| CATEGORY OF PERSONAL DATA SUBJECT                            | EXPLANATION  |
|--|--|
| <b>Employee / Candidate Apprentice</b>                       | : Refers to natural persons who have applied for a job via any means to our Company or who have opened their resume and related information to our Company's review.   |
| <b>Other 3rd Persons</b>                                     | : Refers to the natural persons and other 3rd persons included in this Policy but not covered by the of TAV Milas Bodrum Terminal Isletmeciligi Anonim Sirketi Policy on Protection and Processing of Employees' Personal Data,  |
| <b>Former Employee</b>                                       | : Refers to natural persons whose employment contract with our Company has been ended for any reason (leaving job, termination of contract, retirement, etc.).   |
| <b>Employee / Official / Shareholder of Business Partner</b> | : Refers to natural persons who are shareholders, officials, or employees of the companies with which our Company has established a business partnership for purposes such as sales, promotion, and marketing of our Company's Products and Services, conducting after-sales support, joint customer loyalty programs, while carrying out our Company's commercial activities. |
| <b>Customer</b>  | : Refers to natural persons who use, have already used, or apply for the purpose of using the products and services offered by our Company, or whose request is under evaluation, or who are employees, officials, or shareholders of natural persons or legal entities.   |
| <b>Potential Customer</b>                                    | : Refers to natural persons who are employees, officials, or shareholders of the natural or legal persons who have no request or interest in using our products and services but who have been assessed in accordance with the rules of commercial practice and honesty as having this interest.   |
| <b>Employee / Official / Shareholder of Supplier</b>         | : Refers to natural persons who are shareholders, officials or employees of the companies that provide goods and/or services to our Company in accordance with the contract, exists and/or is likely to be established, between our Company and it.  |
| <b>Visitor</b>   | : Refers to natural persons who have visited our Company's premises, websites or joined our Company's guest internet network.  |

## ANNEX-2 PERSONAL DATA CATEGORIES

| PERSONAL DATA CATEGORIES | EXPLANATION |
|--------------------------|-------------|
|--------------------------|-------------|

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|--|---|
| <b>Information on Family Members and Relatives</b> | : Refers to the information about the family members and relatives of our customers, guarantors, employees, employee candidates and/or employees of our suppliers.  |
| <b>Information on Vehicles</b>                     | : Refers to the information on the vehicles affiliated with the data subject (e.g. plate number).   |
| <b>Information on Employee Candidates</b>          | : Refers to the resume information of our employees and/or candidate apprentices who have applied for a job via any means to our Company.   |
| <b>Information on Audit and Inspection</b>         | : Refers to personal data processed during internal or external audit activities within the scope of our Company's legal obligations and compliance with the company's policies.  |
| <b>Financial Information</b>                       | : Refers to personal data processed in relation to information, documents, and records showing all kinds of financial results created according to the type of legal relationship established with the data subject by our Company, as well as data such as bank account number, IBAN number, credit card information, financial profile, asset data, and income information. |
| <b>Physical Space Security Information</b>         | : Refers to the data such as personal data, camera records, and visitor records related to the records and documents obtained at the entrance to the physical space and during the stay within the physical space.  |
| <b>Audiovisual Data</b>                            | : Refers to the data that has a visual or auditory nature, such as photos, videos, etc.   |
| <b>Information on Legal Action and Compliance</b>  | : Refers to personal data processed within the scope of determination, enforcement, and performance of our legal receivables and claims, as well as compliance with our legal obligations and our Company's policies.   |
| <b>Contact Information</b>                         | : Refers to phone number, address, e-mail, and similar contact information  |
| <b>Process Security Information</b>                | : Refers to personal data (e.g. log records) that are processed to ensure our technical, administrative, legal, and commercial security while performing our business activities.   |
| <b>Identity Information</b>                        | : Refers to data that contains information about the person's identity. (The documents such as driver's license, ID card, and passport containing information such as Name-Surname, T.R. identification number, nationality information, mother's name-father's name, place of birth, date of birth, gender, as well as tax number, etc.)                                     |
| <b>Customer Transaction Number</b>                 | : Refers to information such as records of the use of our products and services and instructions and requests of our customers for the use of our products and services.  |
| <b>Request/Complaint Information</b>               | : Refers to personal data relating to the receipt and evaluation of any requests and/or complaints submitted to our Company.  |
| <b>Special Category of Personal Data</b>           | : Refers to the data relating to the race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, membership to associations, foundations or trade-unions, health, sexual life, criminal convictions of, and security measures imposed on, Persons and their biometric and genetic data.                               |

### ANNEX-3 PROCESSING PURPOSES OF PERSONAL DATA

| PRIMARY PURPOSES   | SECONDARY PURPOSES  |
|--|---|
| <b>For the purposes of planning and/or performing our Company's human resources policies and processes</b> | Planning and/or conducting the application, selection and evaluation processes of employee candidates |
|  | Planning and/or performing internal/external communication activities necessary for the               |

|   |   |
|---|---|
|   | placement of employee candidates and/or students and/or apprentices   |
|   | Planning and/or performing activities that should be carried out within the framework of occupational health and/or safety and/or educational activities  |
|   | Planning and/or performing reference and/or intelligence activities for personnel recruitment and/or Company security processes   |
|   | Planning and/or performing the recruitment, placement, and operation processes of apprentices and/or students   |
| <p><b>Planning and/or performing the activities for ensuring the legal and technical security of our Company and of related persons who have business relations with our Company</b></p>  | Planning and/or performing the relations with the main shareholders   |
|   | Following legal processes   |
|   | Planning and/or performing activities to provide and record information or documents and requests demanded by official institutions and/or organizations  |
|   | Follow-up of contract processes and/or legal claims   |
|   | Ensuring security of the Company's fixtures and/or resources  |
|   | Planning and/or performing the operational activities necessary to ensure that the Company's activities are carried out in accordance with the Company's procedures and/or relevant legislation |
|   | Ensuring the security of the Company's operations   |
|   | Ensuring the security of the Company's compounds and/or facilities  |
|   | Planning and/or performing internal/external audit, inspection, investigation and/or control activities of our Company  |
|   | Planning and/or performing the activities of carrying out the transactions of companies and partnership laws  |
|   | Creating and/or monitoring visitor records  |
| <p><b>Planning and/or performing the activities required for recommending and promoting the products and services offered by our Company and/or for and on behalf of our Company, by customizing them according to taste, usage habits and needs of related persons</b></p> | Designing and/or performing the activities to be developed on customer acquisition and/or value creation in existing customers in digital and/or other media                                    |
|   | Designing and/or performing individual marketing and/or promotional activities (data enrichment, profiling, segmentation, etc.)   |
|   | Planning and/or performing data analytics studies for marketing purposes  |
|   | Identifying and/or evaluating people who will be the subject in marketing activities in accordance with consumer behavior criteria  |
|   | Planning and/or performing marketing processes of products and/or services  |

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| <p><b>Making necessary studies/works and conducting related business processes in order to provide related persons with the opportunity to benefit from the products and/or services offered by our Company and/or for and on behalf of our Company</b></p> | Evaluating customer requests and/or complaints collected in digital and/or other media   |
|   | Creating and/or monitoring the processes of application for and/or sales of products and/or services   |
|   | Payment processing and/or its tracking of products/services  |
|   | Planning and/or performing customer relationship management processes  |
| <p><b>Making necessary studies/works, by our related business units, for the performance of commercial and/or operational activities carried out by our Company, and conducting the business processes in relation thereto</b></p>                          | Planning and/or performing the activities related to event and organization management   |
|   | Follow-up of finance and/or accounting works   |
|   | Performing and/or planning of printed and/or visual or auditory communication activities to be shared with internal and/or external stakeholders |
|   | Planning and/or performing business activities   |
|   | Carrying out the necessary activities for planning and/or performing the accommodation and meeting organizations                                 |
|   | Planning and/or performing corporate communication activities  |
|   | Planning and/or performing logistics/transportation activities   |
|   | Planning and/or performing social responsibility and/or civil society activities   |
|   | Planning and/or performing procurement processes   |
|   | Planning and/or performing internal/ external corporate reporting activities   |
| Planning and/or performing supply chain management processes  |  |
| <p><b>Planning and/or implementing commercial and/or business strategies of our Company</b></p>   | Planning and/or performing the Company's financial risk processes  |

**ANNEX- 4 THIRD PARTIES TO WHICH PERSONAL DATA IS TRANSFERRED AND PURPOSES OF TRANSFER**

| Persons to which Data Transfer can be Made | Definition  | Purpose of Data Transfer   |
|--|---|--|
| <b>Supplier</b>                            | <p>Refers to the parties that provide services to our Company in accordance with the purposes and instructions of our Company for data processing within the scope of the conduct of our Company's commercial activities.</p> <ul style="list-style-type: none"> <li>As part of the realization of payments, personal data shall be shared with banks which are members of the Banks</li> </ul> | <p>Refers to the parties with whom our Company cooperates for the purposes such as conducting joint programs in events, organizations, or similar activities while carrying out its commercial activities.</p> |

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|   | Association of Turkey, or with other financial institutions.   |  |
| <b>Business Partner</b>   | Refers to the parties with whom our Company cooperates for purposes such as conducting joint programs in events, organizations or similar activities while carrying out its commercial activities. <ul style="list-style-type: none"> <li>•</li> </ul>   | Personal data shall be transferred on a limited basis in order to ensure that the objectives of the establishment of a business partnership are met.   |
| <b>Group Companies</b>  | Refers to group companies affiliated with of TAV Milas Bodrum Terminal Isletmeciligi Anonim Sirketi The group companies affiliated with TAV Holding Anonim Şirketi can be found in the list available at the <a href="http://www.tavhavalimanlari.com.tr">[www.tavhavalimanlari.com.tr]</a> web address.   | As part of the assessment of employee candidates, personal data is transferred to group companies that are, directly or indirectly, affiliated with TAV Holding Anonim Şirketi upon the consent of the employee candidate.   |
| <b>Shareholders</b>   | Refers to the shareholders, especially Aéroports de Paris Groupe, that are authorized to carry out the processes related to the operational and commercial activities of our Company, design its strategies and audit activities in accordance with the provisions of the relevant legislation.  | Personal data shall be transferred in accordance with the provisions of the relevant legislation, limited to the performance of the processes related to the operational and commercial activities of our Company, the design of strategies, and audit purposes.                 |
| <b>Legally Authorized Public Institutions and Organizations</b> | Refers to public institutions and organizations authorized to receive information and documents from our Company in accordance with the provisions of the relevant legislation. <ul style="list-style-type: none"> <li>• Courts, tax offices, etc.</li> </ul>  | Personal data shall be transferred being limited to the purpose requested by relevant public institutions and organizations, within their legal authority.   |
| <b>Legally Authorized Special Category of Institutions</b>      | Refers to institutions or organizations that are established in accordance with certain conditions legally set forth under the provisions of relevant legislation and continue their activities within the framework set out by the law. <ul style="list-style-type: none"> <li>• Personal data shall be shared with the companies providing services as independent auditors, within the scope of carrying out independent audit activities.</li> </ul> | Personal data shall be shared on a limited basis concerning the issues involved in the activities carried out by relevant Special Category of institutions and organizations and for the purpose of ensuring that the fringe rights and interests are provided to our employees. |