

ECZACIBAŞI HOLDİNG ANONİM ŞİRKETİ
POLICY ON THE PROTECTION AND PROCESSING OF PERSONAL DATA

December 2023

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1. INTRODUCTION

1.1. Purpose and Scope

Law No. 6698 on Protection of Personal Data (the "**Law**") has been enacted as of 7 April 2016, and this Policy on the Processing and Protection of Personal Data of Eczacıbaşı Holding Anonim Şirketi ("**Policy**") has been drawn up and implemented in order to ensure compliance of Eczacıbaşı Holding Anonim Şirketi (the "**Company**" or "**Eczacıbaşı Holding**") with the Law and to determine the principles to be followed by Eczacıbaşı Holding in fulfilling its obligations regarding the protection and processing of personal data.

This Policy determines the conditions for processing personal data and sets out the main principles adopted by Eczacıbaşı Holding in the processing of personal data. Accordingly, the Policy includes general explanations covering all personal data processing activities carried out by Eczacıbaşı Holding for persons other than Eczacıbaşı Holding's employees within the scope of the Law and all personal data subjects whose personal data are processed by Eczacıbaşı Holding. Disclosure texts prepared separately for the processes in which the personal data and sensitive personal data of the data subjects are processed are provided.

Issues regarding the processing of personal data of Eczacıbaşı Holding employees are regulated separately in the Policy on the Processing and Protection of Personal Data of Eczacıbaşı Holding Anonim Şirketi Employees.

1.2. Effective Date and Amendment

This Policy has entered into force upon approval by Eczacıbaşı Holding.

The Company reserves the right to make amendments to the Policy in parallel with legal regulations. The up-to-date version of the Policy is available on the website of Eczacıbaşı Holding at <https://www.eczacibasi.com.tr/en/protection-of-personal-data>.

In case of any conflict between the legislation in force, particularly the Law, and the regulations in this Policy, the provisions of the legislation in force shall apply.

2. PRINCIPLES AND CONDITIONS REGARDING PERSONAL DATA PROCESSION

2.1. Principles regarding Personal Data Procession

Eczacıbaşı Holding processes personal data in accordance with the personal data procession principles stipulated under article 4 of the Law. These principles should be complied with in terms of each and every personal data procession activity:

- **Processing personal data in compliance with the law and rules of good faith;** Eczacıbaşı Holding acts in accordance with the relevant laws, secondary regulations and general principles of law in the processing of personal data; prioritizes processing personal data limited to the purpose of processing and takes the reasonable expectations of data subjects into account.
- **Keeping personal data accurate and up-to-date;** Eczacıbaşı Holding pays attention to whether the personal data processed by it is up-to-date and conducts controls in this regard. Data

subjects are allowed to demand correction or deletion of inaccurate and outdated data of theirs in this respect.

- **Processing personal data for definite, clear and legitimate purposes;** Eczacıbaşı Holding determines the purposes of processing data in accordance with the law before each personal data processing activity.
- **Ensuring that personal data is relevant, limited and proportionate to the purpose for which it is processed;** Eczacıbaşı Holding limits the data processing activity to the personal data required to fulfill the purpose of collection and takes necessary steps to ensure that personal data not related to this purpose are not processed.
- **Retaining personal data for the period that is either stipulated in the legislation or required by the processing purpose;** Where a longer retention period is not determined by Eczacıbaşı Holding in accordance with the law, taking into account the sector practices regarding the retention of personal data, the personal data processed by the Company is deleted, destroyed or anonymized after the purpose of personal data processing is eliminated or upon the expiration of the period stipulated in the legislation.

2.2. Conditions regarding Personal Data Procession

The Company processes your personal data in the existence of at least one of the personal data processing conditions stipulated under article 5 of the Law. The conditions in question are described as follows:

- **Explicit consent of the personal data subject;** in the absence of other data processing conditions, the personal data of the data subject may be processed by Eczacıbaşı Holding in accordance with the general principles set out under the heading 3.1. in the event that the data subject gives consent with his/her free will, with sufficient information regarding the personal data processing activity, in a manner that leaves no room for hesitation and limited to that transaction only.
- If **personal data processing activity is clearly stipulated in the laws**, personal data may be processed by Eczacıbaşı Holding without the explicit consent of the data subject. In such case, the Company is to process personal data within the framework of the relevant legal regulation.
- If **the explicit consent of the data subject cannot be obtained due to actual impossibility and personal data processing is necessary**, personal data of the data subject who is unable to disclose his/her consent or whose consent cannot be validated by the Company will be processed in the event that personal data processing is mandatory to protect the life or physical integrity of the data subject or a third person.
- If **the personal data processing activity is directly related to the constitution or execution of a contract**, personal data processing activity will be carried out if it is necessary to process personal data of the parties to a written or verbal contract established between the data subject and Eczacıbaşı Holding.
- If **it is mandatory for the data controller to carry out personal data processing activities in order to fulfill its legal obligations**, Eczacıbaşı Holding will process personal data in order to fulfill its legal obligations stipulated under the applicable legislation.
- If **the data subject has publicized their personal data**, the personal data that has been disclosed to the public in any way by the data subject and made available to everyone as a result of the publication may be processed by Eczacıbaşı Holding without the explicit consent of the data subjects, limited to the purpose of publication.

- If **personal data processing is mandatory for the establishment, exercise or protection of a right**, Eczacıbaşı Holding may process the personal data of the data subject without the explicit consent of the data subjects within the scope of the obligation.
- If **data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject**, personal data may be processed by Eczacıbaşı Holding, provided that the balance of interests of Eczacıbaşı Holding and the data subject is looked after. Accordingly, the Company first determines the legitimate interest to be achieved as a consequence of the processing activity in the processing of data based on legitimate interest. It evaluates the possible impact of the processing of personal data on the rights and freedoms of the data subject and performs the processing activity if it is of the opinion that the balance is not disturbed.

2.3. Conditions regarding Sensitive Personal Data Procession

Sensitive personal data are stipulated as being in limited number under article 6 of the Law. These are namely the data related to race, ethnic origin, political opinion, philosophical belief, religion, sect, or any other faith, dress, association, foundation or trade union membership, health, sexual life, penal conviction, and security measures, as well as the biometric and genetic data.

Eczacıbaşı Holding processes sensitive personal data in accordance with the relevant legal regulations and by ensuring that additional measures determined by the Personal Data Protection Board ("Board") are implemented the following cases:

- **Processing of sensitive personal data other than health and sexual life**; if it is explicitly stipulated in the laws, in other words, if there is a clear provision in the relevant law regarding the processing of personal data, it can be processed without seeking the explicit consent of the data subject. Otherwise, the explicit consent of the data subject shall be obtained for the processing of such sensitive personal data.
- **Personal data relating to health and sexual life** may be processed without seeking explicit consent by persons or authorized institutions and organizations under the obligation of confidentiality for the purposes of protecting public health, executing preventive medicine, medical diagnosis, treatment and care services, planning and management of healthcare services and financing. Otherwise, the explicit consent of the data subject shall be obtained for the processing of such sensitive personal data.

3. TRANSFER OF PERSONAL DATA

Eczacıbaşı Holding may transfer personal data to third parties at home or abroad if necessary in the data processing process in accordance with the additional regulations listed in articles 8 and 9 of the Law and determined by the Board; in case the conditions for the transfer of personal data exist.

- **Transfer of personal data to third parties at home**; Eczacıbaşı Holding may transfer personal data to third parties at home in the presence of at least one of the data processing conditions specified in articles 5 and 6 of the Law and explained under this Policy and provided that the basic principles regarding the data processing conditions are complied with.
- **Transfer of personal data to third parties abroad**;
If the country to which the transfer will be made is among the safe countries with adequate protection declared by the Board; Eczacıbaşı Holding may transfer personal data to third parties abroad in the presence of at least one of the data processing conditions specified in articles 5

and 6 of the Law and explained under this Policy and provided that the basic principles regarding the data processing conditions are complied with.

If the country to which the transfer will be made is not among the safe countries with adequate protection declared by the Board; personal data may be transferred to third parties abroad in the presence of at least one of the data processing conditions explained under this Policy and provided that the basic principles set forth in article 4 of the Law are complied with:

- There is explicit consent by the data subject
- There is written undertaking of adequate protection by the Company and the data recipient in the relevant country and permission of the Board for the relevant transfer

Eczacıbaşı Holding can transfer data to the relevant parties when necessary in the data processing process within the scope of the general principles of the Law and the data processing conditions specified in articles 8 and 9. The parties to whom personal data are transferred and the purpose of transfer are explained in the disclosure texts provided specific to the process.

4. DISCLOSURE TO DATA SUBJECTS AND RIGHTS OF DATA SUBJECTS

Data subjects are required to be elucidated about the processing of their personal data before, or at the latest at the time of, the processing of personal data pursuant to article 10 of the Law. The necessary internal structure has been established pursuant to the relevant article to ensure that data subjects are elucidated in all cases where personal data processing activities are carried out by Eczacıbaşı Holding in its capacity as the data controller. Accordingly;

- The rights of data subjects pursuant to article 11 of the Law are listed below:
 - To find out whether their personal data has been processed,
 - To request information if their personal data has been processed,
 - To find out the purpose for processing of their personal data and whether they have been used in accordance with this purpose,
 - To know the third parties to whom their personal data have been transferred at home or abroad,
 - To request for the correction of personal data if they are processed incompletely or incorrectly and ask that the process carried out in this context be notified to the third parties to whom personal data have been transferred,
 - To request for the deletion or destruction of personal data if the reasons for processing the same have ceased to exist although they have been processed in accordance with the Law and other relevant laws, and ask that the process carried out in this context be notified to the third parties to whom personal data have been transferred,
 - To object to occurrence of any result that is to their detriment by means of analysis of personal data exclusively through automated systems,
 - To request compensation in case they incur damages due to processing of personal data in violation of the Law.

Your requests regarding your personal data within the scope of Article 11 of the Law can be submitted in accordance with the [Communiqué on the Procedures and Principles Regarding Application to the Data Controller](#) in writing or in accordance with the registered electronic mail (KEP) address, secure electronic signature, mobile signature or you can always send it to the addresses below using your e-mail address that you have previously provided to Eczacıbaşı and is registered in our system.

Data Controller: Eczacıbaşı Holding A.Ş.

E-mail: eczacibasi-kvkk@eczacibasi.com.tr

Kep Address: eczacibasiholding@eczacibasiholding.hs02.kep.tr

Address: Eczacıbaşı Holding A.Ş., Kanyon Ofis, Büyükdere Caddesi 185 Levent 34394 – İstanbul.

When submitting your application to us regarding your rights in accordance with the law, you can use the Data Subject Application Form at <https://www.eczacibasi.com.tr/en/protection-of-personal-data>. Depending on the nature of your request, your applications will be concluded free of charge as soon as possible and within thirty days at the latest; however, if the transaction requires an additional cost, you may be charged a fee according to the tariff to be determined by the Personal Data Protection Board.

Eczacıbaşı Holding primarily ascertains whether the claimant is the real beneficiary while assessing the applications. On the other hand, the Company may ask for detailed and additional information in cases of necessity to reach a better understanding of the claim in question.

The Company responds to the applications of data subjects either in writing or electronically. In case an application is to be rejected, cause of such rejection shall be declared with its rationale to the relevant data subject.

If personal data are not obtained directly from the data subject, the Company carries out activities to elucidate the data subjects (1) within a reasonable period of time from the acquisition of personal data, (2) if personal data will be used for communication with the data subject, during the first communication, (3) if personal data will be transferred, at the latest during the first transfer of personal data.

5. DELETION, DESTRUCTION AND ANONYMIZATION OF PERSONAL DATA

In cases where a longer retention period is not determined by Eczacıbaşı Holding in accordance with the law, taking into account the sectoral practices regarding the retention of personal data, in the event that the reasons requiring its processing disappear, although it has been processed in accordance with article 7 of the Law, personal data shall be deleted, destroyed or anonymized by Eczacıbaşı Holding *ex officio* or upon the request of the data subject, in accordance with the guidelines published by the Personal Data Protection Authority, periodic destruction periods and application of the data subject.

The personal data processed by the Company is handled based on categories, and maximum data retention periods have been determined for each category of personal data in line with the data

processing process to which it relates. Detailed information on how the retention and destruction process will be carried out, including the maximum periods mentioned, is set out in the Personal Data Retention and Destruction Policy drawn up by the Company.